Contents

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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Please find our response to the Guildford Proposed Submission Local Plan consultation below. This response has been agreed by Councillor Martin Tennant, the Portfolio Holder for Environment and Service Delivery.

Rushmoor Borough Council provided a detailed response to the Guildford Borough Proposed Submission Local Plan: strategy and sites document of 2016. The Council recognises that this current stage is a focussed consultation on the changes being proposed to the Plan prior to submission, and Rushmoor Borough Council has not identified any proposed changes that would require further detailed comments.

However, the Council is mindful of the discussions which took place at the recent Waverley Local Plan Examination Hearings relating to unmet need in the West Surrey Housing Market Area (HMA). Therefore, the Council would like to take the opportunity to clarify our position.

The Hart, Rushmoor and Surrey Heath (HRSH) SHMA (2016) identifies a housing need of 1,200 homes per annum across the HMA between 2014 and 2032. Of these, 436 homes per annum are identified as being required within Rushmoor, which equates to a total need of 7,850 dwellings to be provided in the Borough over the Plan period (2014 to 2032).

In assessing whether this need can be met, given the tightly constrained urban nature of the Borough, the Council has sought to maximise the use of town centre sites, both to enable housing delivery and to support town centre regeneration objectives. This included developing a more challenging understanding of site capacities. The Council has also explored opportunities for the further release of employment sites, having regard to the need to provide a reasonable balance between employment and housing, and ensure that there is sufficient supply of employment sites to meet the economic needs of the Functional Economic Area and of the Enterprise M3 LEP area. This further work was undertaken through the preparation of the SHELAA (2017), which identified that the Council is in a position to meet the OAHN for Rushmoor set out in the latest version of SHMA (2016).

In terms of meeting wider housing needs, the Council has continued to cooperate with authorities outside the Hart, Rushmoor and Surrey Heath HMA to raise awareness about the constrained nature of the Borough. Whilst we have been responsive to discussions on the issue, the evidence in the SHELAA confirms that the Council is not in a position to assist other authorities or HMAs in meeting any shortfall they may be expecting or have in meeting their identified OAHN.

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

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

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

The Green Belt and Countryside Study

We note that the site promoted by Linden lies within Parcel H15 of the Green Belt and Countryside Study produced by Pegasus on behalf of the Council in support of the emerging Local Plan.

Parcel H15 is broadly rectangular in shape and extends approximately 0.85 miles westwards from the defined settlement of Flexford. The parcel extends approximately 0.6 miles from the edge of the site promoted by Linden.

Appendix 2 of Volume 1 of the Study dated February 2013 identifies a series of potential development areas surrounding urban areas and villages. Four such areas are identified at Flexford as identified in Figure 1 below. Of these four areas, one potential development area was identified to the west of Flexford, occupying approximately half of the land now promoted by Linden.

[Figure 1: Extract from Appendix 2 of the Green Belt and Countryside Study Volume 1 (February 2013)]

Volume 1 of the Study sets out that:

“Land parcels H10, H11, H12, and H15 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north of the railway line, between Westwood Lane, Pussey’s Copse and Glazier’s Lane (H12-C); and between residential properties on Glazier’s Lane and Strawberry Farm (H10-B). PDAs have also been identified to the south of the railway line, continuous with residential properties on Beech Lane, Westwood Lane and Green Lane East (H15-A); and between The Paddocks and West Flexford Lane (H11-D). The PDAs are generally enclosed by undulating topography, mature woodland and hedgerow treecover. H15-A is located to the north of Ancient Woodland and the SNCI at Wanborough Wood and at Highfield Copse to the west of Flexford. H10-B is located to the north of H11-D, located within an SNCI to the east of The Paddocks residential area. Ecology is therefore a significant constraint that would need to be addressed with respect to any proposed development within H11-D.”

Table 2 of Volume 1 set out the sustainability credentials and estimated residential development capacities of potential development areas surrounding villages across the Borough. In relation to development within Parcel 15, table 2 identified that it had an estimated capacity of 114 dwellings SUSTAINABILITY CREDENTIALS.

Volume 2 of the Study includes a table which sets out how each parcel relates to four Green Belt purposes. The table below sets out the summary contained in the Study in relation to Parcel H15 alongside a comment on behalf of Linden. Volume 2 of the Study indicates that Parcel H15 scores ‘3’ indicating that it contributes to three of the four Green Belt purposes.

<table>
<thead>
<tr>
<th>Green Belt Purpose</th>
<th>Comment in Volume 2 of the Green Belt and Countryside Study</th>
<th>Turley Comment</th>
</tr>
</thead>
</table>

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To check the unrestricted sprawl of large built-up areas

| To prevent neighbouring towns from merging into one another |
| Checks southward sprawl of Flexford |
| Parcel H15 is located to the west of Flexford and plays no role in checking the southward sprawl of the settlement. In relation to the westward growth of Flexford we note that Parcel H15 extends approximately 0.85 miles from the edge of the settlement and 0.6 miles from the edge of the site promoted by Linden. Furthermore, to the west and south of the site promoted by Linden there are a number of areas of woodland which would serve to limit the onward expansion of Flexford.

We therefore consider that the site promoted by Linden can be developed without leading to the unrestricted sprawl of large built-up areas.

| To prevent neighbouring towns from merging into one another |
| Prevents Flexford and Ash Green from merging |
| We understand that there is approximately 1.23 miles between the western edge of Flexford and Ash Green. If the site promoted by Linden were developed then there would be a remaining and significant distance between the settlements of approximately 0.96 miles. Furthermore, the presence of the woodlands to the west of the site promoted by Linden would serve to limit the further westwards expansion of the settlement.

We therefore consider that the site promoted by Linden can be developed without leading neighbouring towns (or villages) merging into one another.

| To assist in safeguarding the countryside from encroachment |
| Assists in safeguarding the countryside from encroachment |
| As with other parcels identified in the Study which adjoin a settlement, development to the west of Flexford in Parcel H15 would result in development in the countryside. However the site promoted by Linden can be accommodated without leading to the unrestricted sprawl or large built-up areas and without leading to neighbouring towns (or villages) merging into one another.

| To preserve the setting and special character of historic towns |
| Does not preserve the setting and special character of an historic town |
| We agree with the conclusions in this regard

As the table above demonstrates, an assessment of the site promoted by Linden indicates that it makes a reduced contribution to the purposes of the Green Belt than the large Parcel H15.

Volume 2 of the Study highlights flaws in the assessment of the Green Belt parcels. For example a parcel which adjoins a settlement such as Parcel H15 is assessed as checking the sprawl of a built-up area and as safeguarding the countryside from encroachment. In contrast, Parcel H4 which does not adjoin a settlement is not said to check the built-up area of a settlement or to safeguard the countryside from encroachment. It cannot be a sound approach that areas physically separated from sustainable settlements are assessed as playing a lesser role against the purposes of the Green Belt and such an approach runs the risk of failing to support the delivery of sustainable patterns of development.

Volume 3 of the Study relates to ‘Land surrounding the Villages across the Borough’. Part of the site promoted by Linden is identified in Volume 3 of the Study as H15-A and in assessing potential development areas around Flexford the Study states that:
“H15-A is surrounded by defensible boundaries including treecover and residential garden boundaries on Beech Lane to the north, residential gardens on Westwood Lane to the east, hedgerows near residential properties on Green Lane East to the south, and hedgerows within open farmland to the west of the PDA.”

Although the site promoted by Linden is larger than the potential development area (H15-A) identified in the Study, it is considered that the conclusions apply to each area given the nature of the land and its surroundings to the west of Flexford.

Volume 4 of the Study considers insetting villages from the Green Belt and the definition of new Green Belt boundaries in the Borough. Volume 4 concluded that Flexford to the south of the railway should be inset from the Green Belt due to:

- The difference in open character to the north and south of the railway line, with high density development and enclosure more evident to south of the railway line in comparison to the north;
- The high density residential development located on Christmas Pie Avenue, Orchard Way, Cull’s Road, Flexford Road and Westwood Lane to the south of the railway line; and
- The presence of recognisable and defensible boundaries to the south of the railway line including treebelts to the east of The Paddocks, Crossways and Flexford Road, the hedgerows and newly planted woodland to the south of Flexford Road, and fencelines, hedgerows and treebelts to the west of Westwood Lane.

Volume 5 of the Study sets out a list of 10 settlements (or combinations of settlements) at paragraph 21.1 which have been assessed for potential major expansion. The list includes “Normandy and Flexford”. Paragraph 21.47 of Volume 5 identifies that Normandy and Flexford had a population of 1,784 and was 10th in the sustainability ranking.

Volume 5 of the Study appears to indicate that a Potential Major Development Area between Normandy and Flexford may be appropriate (site H12-A). However, Volume 5 does not appear to consider the alternatives to the large scale Potential Major Development Area between Normandy and Flexford, for example the opportunities presented by sites such as H15-A which forms part of the site now promoted by Linden. This is particularly concerning as Volume 5 identifies concerns about the Potential Major Development Area between Normandy and Flexford for Green Belt reasons (such as detracting from the openness of the surroundings and greater settlement coalescence).

There does not appear to be any assessment, undertaken between Volumes 3 and 5 of the Study to identify why site H15-A (or any other sites at Flexford other than H12-A) was not assessed further. This is of particular concern given that the Study identifies the settlement as a sustainable location Linden reserves the opportunity to comment on such evidence should this be made available. As far as we can establish, the Study presents a series of potential areas at Flexford for development in Volume 3, then in Volume 4 concludes that the settlement should be inset from the Green Belt and in Volume 5 considers the opportunities for a Potential Major Development Area between Normandy and Flexford, but without explaining why the other opportunities had not been pursued.

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

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp171/2430</th>
<th>Respondent:</th>
<th>17461921 / Linden Homes South</th>
<th>Agent:</th>
<th>Turley (David Murray Cox)</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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These representations raise the following concerns with regards to Policy S2:

- The identified housing needs of Guildford Borough;
- The provision of housing for the unmet needs of neighbouring authorities;
- The phasing of development as set out in the Annual Housing Target table;

The identified housing needs of Guildford Borough

The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.

The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.

The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.

As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

Paragraph 2.4 of the SHMA addendum notes that there are significant affordability issues in the HMA. In this regard we note that the evidence indicates that these affordability issues are worsening (the 2017 addendum indicates that the affordable housing need has risen from 517 dpa to 552 dpa). We understand that the Council has retained the approach to applying an affordability uplift in the 2017 addendum that was used in the 2015 SHMA. Furthermore, we understand that this limits the uplift to one related to an adjustment to the household formation rates of younger households. We understand that this results in a 9% upward adjustment to the ‘starting point’ household projection. Given the existing and worsening affordability issues in the Borough, we consider that it is unreasonable to limit this uplift to 9%. In fact, we note that in the adjoining borough of Waverley, the Local Plan Part 1 Inspector has applied an uplift of 25%

The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to Plan.

The provision of housing for the unmet needs of neighbouring authorities

At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities within the same Housing Market Area (for example Waverley and Woking Boroughs).

We understand that Woking Borough is continuing to plan on the basis of its Core Strategy requirement (292 dwellings per annum to 2027, in comparison to the OAN identified in the West Surrey SHMA 2015 of 517 dwellings per annum between
2013 - 2033) (therefore 225 dwellings fewer). The Waverley Local Plan Part 1 was originally prepared on the basis of meeting an OAN of 519 dwellings per annum; the Inspector’s consideration during the Examination has revealed that provision should be made for an OAN of at least 590 dwellings per annum. Furthermore, we understand the Waverley Local Plan Part 1 Inspector has concluded that provision should be made for a proportion of Woking’s unmet need within Waverley and Guildford Boroughs and that the Inspector settled on a figure of 83 dwellings per annum as being equivalent to half of Woking’s unmet need.

It is essential that consideration is given to how the unmet needs of Woking are to be provided for. A failure to make provision for this level of housing development would result in a shortfall of 225 dwellings per annum.

In addition, we consider that the Guildford Borough Local Plan should be prepared on the basis helping to provide for other authorities should the need arise.

The Council’s proposal to designate a large part of the Borough as Green Belt further restricts the ability to cater for unmet housing needs arising from within the HMA.

**The phasing of development as set out in the Annual Housing Target table**

We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. In such circumstance a proportion of the population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2026/2027). Far from dealing with an undersupply in the first five years of the Plan period, the Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequentially this raises concerns over whether any accrued shortfalls can be resolved.

If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates.

Furthermore the paper identifies housing delivery within the first five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit
accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

We do not consider that paragraphs 4.1.9a and 4.1.9b or the Housing Topic Paper justifies the Council’s phased approach to the delivery of housing during the Plan period. The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in housing supply. We consider that this position demonstrates the clear need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider Housing Market Area if necessary) are considered.

Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810 dwellings. It appears as though the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

We note that paragraph 4.1.9a of the Proposed Submission Local Plan states:

“This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a.

There are various considerations that need to be addressed in regards to the Proposed Submission Local Plan and the level of unmet housing need, in particular the Council’s inability to demonstrate a five year housing supply and the strategy for delivering housing within the Proposed Submission Local Plan. In particular, with the five year supply shortage and an expected shortfall of sites within the early years of the Local Plan, the Council’s housing supply position can only be expected to worsen. Furthermore the Council’s reliance on strategic sites, in the latter half of the plan period could lead to longer term shortfalls or delays in housing supply if those sites fail to deliver at the rate expected.

The housing supply shortfall and the Council’s reliance on large sites (delivering at the end of the Plan period) reinforces our view that the Council should seek to utilise a greater range of sites.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp173/625</th>
<th>Respondent: 17462113 / Ian Whitby</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash Green</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4.3.29 Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area is allocated as a strategic location for development.

I object to several implications of this statement:

- The Local Plan lists Ash, Ash Vale and Tongham separately but then proceeds to speak of the “Ash and Tongham urban area” as if Ash Green were part of this. Ash Green is distinctly separate and has an entirely different, rural character from the “Ash and Tongham urban area”.

- The boundary of Ash Green has been redrawn by the local Plan to suit the planners ambitions. Ash Green includes Ash Grange, Drovers Way and Ash Green Road. Although it may be convenient for an ambitious planner to suggest that these areas are within the “Ash and Tongham urban area” they are not and never have been. The Deeds of my house very clearly state that it lies within Ash Green. There is a clear separation of these 2 areas and the buffer zone between them should be maintained to retain the rural character of Ash Green, Ash Manor, Ash Green Road and Drovers Way. It is not acceptable to join these areas and lose the area’s rural character.

- There are very few amenities or services in the “Ash and Tongham urban area”. Ash has one secondary school and a number of heavily subscribed primary schools. There are 3 shops in Ash, a petrol station and 1 pub. Tongham has a similar number. To suggest that “Given its relative sustainability…” is fanciful. The “Ash and Tongham urban area” is not well served with services and amenities and adding additional houses before first providing such services would create a sprawling urban area with no community heart or social centre.

- “4.3.30 We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash and Tongham.”

Ash Green is not mentioned in this statement. Ash Green already has a separate identity very different from Ash or Tongham. Ash is characterised by its housing estates (either council or private) and its acres of identical houses. Ash Green is characterised by Ash Grange, Ash Manor and individual houses dating from the 1900s with unique Edwardian or Victorian features.

The Borough’s responsibility is to maintain the uniqueness that already exists. A green buffer zone maintained between Ash and Ash Green is essential to ensure this.

- “4.3.30 We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash and Tongham.”

See point above - namely, that the Borough’s responsibility is to maintain the uniqueness that already exists. A green buffer zone maintained between Ash and Ash Green is essential to ensure this.

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

**Attached documents:**

**Comment ID:** pslp172/4186  **Respondent:** 17462113 / Ian Whitby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to the proposed increase in homes (1200 -> 1750) which would result in the development of a single urban dormitory town with few facilities and the complete erosion of the unique characteristics of Ash Green.

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

Attached documents:

- Traffic congestion on the major roads west of Guildford is already at levels which significantly impact the lives of people living in the Ash Green area. A high volume of traffic passes through Ash Green each day to get onto the Hogs Back and as your Local Plan points out:

  “2.14a Significant, recurrent traffic congestion is experienced during peak hours on the A3 trunk road, both as it runs through the urban area of Guildford, with queuing extending back onto the dual carriageway section of the eastbound A31,”

The additional housing proposed in the Local Plan will significantly add to traffic levels. Delays of 30 minutes are already common at the A31 / A3 junction. How can it be acceptable that the borough’s roads are already recognised as an impediment to business traffic to London and the M25 and yet it more houses are being proposed?

- The minor roads in Ash Green are already overcrowded with traffic volumes they were not designed to accommodate. I live on Ash Green Road, which acts as a “rat run” for commuters seeking to miss out the railway crossing at Ash station. The level crossing at Ash is closed for 35 minutes in each hour at peak times. The consequence is that roads such as Ash Green Road see excessive volumes of traffic during the morning and evening periods. Typical traffic rates are a car every 5 seconds for 2 days at each end of the day- on a road with no pavement, cars parked outside homes, a poorly maintained road surface and a humpback bridge and dangerous T-junction.

Adding more houses in this area will flood roads such as this with more traffic than they can possible handle and ruin the lives of those who live in the area.

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

Attached documents:
Sustainability

I see nothing being put forward following last year's Consultation to improve the sustainability of the proposed West Horsley development sites and it is questionable whether it meets National policy requirements. I understand from the West Horsley Parish Council response to the consultation that neither they nor any other parish council were invited to "engage in early essential collaboration" as advised in the NPPF Plan Making - Local Plans. As we all know, every home on the West Horsley sites will need a minimum of one car (and maybe even two) to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel. I am in complete agreement with my Parish Council in rejecting the proposed grossly disproportionate 35% growth in our village housing stock on unsustainable sites over the first 5 years of the plan.

The housing numbers proposed in the draft Local Plan remain unsound in that they continue to be derived from a flawed Strategic Housing Market Assessment. The independent review of these assessed housing needs to be found in Appendix 1 to the West Horsley Parish Council response of 18 July 2017 to the present consultation suggests that there are significant errors in the OAN West Surrey SHMA, which, if accepted, would significantly lower the numbers of houses required. As before, there is nothing in the Local Plan which indicates that, if any housing is built in either of the Horsleys in accordance with its proposals, it will be of the kind actually required by the villages.

The recent successful appeal for the creation of a SANG in Long Reach in West Horsley (not in the Local Plan as such) was said to be justified by the needs of Guildford and surrounding area. This is laughable for managed space in the form of what amounts to an urban park does not replace actual countryside that has been built over.

I continue to object to the lack of provision for sustainability, be it in housing, transport or in other aspects of the current draft of the Local Plan.

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

Attached documents:

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I continue to object to the inclusion of policy A35, Three Farms Meadows, in the draft Local Plan. Much of the above general comment in relation to the Horsleys is also applicable to this site. Primarily, the proposal removes 3.1 h of land from the Green Belt without any justification. There are no special reasons for this as such for it is effectively unsustainable because of its location and the constraints of the site. Junction 10 of the M25 is unworkable at times and even the proposed improvement of the junction will not alter the totally restricted access to this site from the A3/M25. In this respect, it is will rely at that end on the same junction on the A3 as RHS Wisley, a major visitor attraction with its own plans for expansion. The access at the other end of the A35 site is from narrow country lanes and any substantial increase in traffic including bus services there will make them even more dangerous than they are now and increase the deterrent effect
on walking/cycling to the various railway stations. I could also mention problems with drainage, flooding, insufficient sewerage, lack of medical services, schools, transport connections in the surrounding areas as well.

Quite apart from the wholly unsustainable nature of the site on all levels, any substantial development of it, such as that presently proposed and under appeal, will have an overwhelming effect on the Horsleys and other nearby villages, already faced with proposals for their own expansion in the draft Local Plan.

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

Attached documents:

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**Comment ID:** pslp171/2446  **Respondent:** 17462145 / John Maycock  **Agent:**

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

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

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

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The Green Belt and Insetting of Village Boundaries

Despite the volume of comments received, I object to the fact that no change has been made to the proposal that the Horsleys are both removed from the Green Belt and that the settlement boundaries be extended at the same time. I can welcome the reduction by 90 in the number of new homes projected for West Horsley but the draft Plan still proposes far too many new homes on Green Belt Land and, additionally, the east side of the Borough is now to take an even greater proportion of these. Why is Guildford not following the choice of many other Councils to constrain its overall housing growth to protect Green Belt? Even the new reduced objectively assessed housing target will by 2034 (the end of the Plan Period) mean that Guildford will have grown by nearly 25%, which is nearly double the prediction for the growth of Guildford made by the Office for National Statistics.

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

Attached documents:

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**Comment ID:** pslp173/631  **Respondent:** 17462657 / Malcom Scott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I have made representations to you on previous drafts of the plan which have been ignored, however I ask you to take into account my objections to Guildford Borough Local Plan June 2017 for the following reasons:

1. the unfair imbalance of the plan across the borough as regards housing, becoming even more biased against the north east of the borough. Guildford Borough is over 100 square miles. Of the 11,350 homes proposed in the plan, 40.6% (4,613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

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

Attached documents:

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Comment ID: pslp172/4222  Respondent: 17462657 / Malcom Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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

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

I object to removal of brownfield site (A34) from the plan: Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. GBC claims to "have adopted a 'brownfield first' approach" (page 5) but this is clearly not the case, and is contrary to national guidelines.

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

Attached documents:

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Comment ID: pslp172/4226  Respondent: 17462657 / Malcom Scott  Agent:

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

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

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

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

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

2. it is further from railway stations than any other identified strategic site.

3. local roads are at capacity particularly when the SRN is subject to accidents, diversions, roadworks etc
4. it is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

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

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

7. it is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account, including regular events at the RHS which attract 1000s more visitors

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

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

10. it is uncertain when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

14. the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

16. I object to the removal of additional 3.1 ha from the green belt without any justification

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

18. I object to para 21 which "limits" development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

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

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000s of objection from statutory consultees and local residents

For the reasons listed above and numerous other reasons cited by Ripley Action Group, Wisley Action Group, Horsley Countryside Preservation Society all of whom I fully support, this plan is unsound and not fit for purpose.

I urge you to amend the draft plan taking the above concerns fully into consideration, including removal of the former Wisley Airfield from the Plan.

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

Attached documents:
I object to the increase in housing proposed in Tannery Lane (site A42) This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

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

Attached documents:
I object to the proposal for a Waste Management Facility in Green Belt (A58). The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

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

Attached documents:

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Comment ID: pslp171/2551  Respondent: 17463137 / Brad Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

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

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

The policy relating to Surrey Hills AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable.

This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

I OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated.

Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

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

Attached documents:

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Comment ID: pslp172/4261  Respondent: 17463617 / Steffan Stringer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Policy A29: Land to the south and east of Ash and Tongham

• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore, solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham  
b) A331/A323 intersection  
c) A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

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“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp171/2574  Respondent: 17463617 / Steffan Stringer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

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

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

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

• 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However, to make this growth sustainable, suitable infrastructure must be implemented before further development.”

• 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

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

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: pslp173/656  Respondent: 17463841 / The Earl of Onslow and the Trustees of the Clandon Estate  Agent:

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

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

### Sustainability Appraisal

2.60 We note the sustainability appraisal has been updated as part of the current consultation. However, of the options and scenarios tested, although a number support the inclusion of Onslow Park, the way the options are construed does not reflect the level of housing need we consider should be provided and in addition are structured in such a way as to not allow for the proper consideration of Onslow Park as an alternative to one or more of the proposed sites which are considered simply as part of the baseline. The study also assumes a generally increasing level of impact pro-rata to the level of development proposed. This is not likely to be the case as sites in less sustainable locations or which impact on national or international level sites and designation will by definition have a greater impact and be less sustainable.

2.61 The assessment also fails to properly reflect the beneficial effect of locating development close to the urban area, where mixed use development can contribute in broad terms to economic, social and environmental infrastructure and achieve a wider public benefit.

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

Attached documents:

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<th>Comment ID:</th>
<th>pslp171/2599</th>
<th>Respondent:</th>
<th>17463841 / The Earl of Onslow and the Trustees of the Clandon Estate</th>
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<td>WYG Planning (Sarah Evans)</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

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

### Infrastructure and Delivery Section: Policies ID1-4 + Site Allocations A1-59

2.29 The changes made to the Infrastructure Schedule (Appendix C) cast significant doubts on the deliverability and viability of both the Local Plan itself and the large allocated sites (which account for 64% of the anticipated housing supply).

2.30 Appendix C contains the “key infrastructure requirements on which the delivery of the plan depends”. It is critical therefore that the infrastructure can be delivered on time and financed as per the detailed schedules. By definition, if it is not possible now to guarantee that the infrastructures as listed can all be delivered and funded on time then the plan will have failed its objective of identifying a confirmed number of homes to be delivered.

2.31 In assessing whether this infrastructure is likely to be delivered, it is salient to look at the total cost of the proposed key works as no total is included in the schedule.

- Transport Rail (NR1 - NR6): £155 million to be funded by Network Raid and Developer funded (with £20 million being specific developer funded as well as developer funding contributing to NR1 (£100 million)).
- Transport Strategic Roads (SRN1 - SRN10): £334.1 million to £784.1 million to be funded by Highways England and...
Developer funded (with £30 million being specific developer funded as well as developer funding contributing to the £300 million to £750 million required for SRN2 / SRN3 / SRN5).

- Transport Local Road Networks (LRN1 - LRN25): £87.6 million to £102.6 million to be funded mainly by the developers (£73 million to £88 million).

- Park and Ride (P&R1): £7.5 million to be funded by the developers.

- Sustainable Movement Corridors (SMC1 - SMC6): £80 million to £90 million to be funded by the developers and local growth fund.

- Bus Transport (BT1 - BT2): £5.25 million to £10.25 million to be developer funded.

- Bus Transport (BT3 - BT6): Not yet costed - to be developer funded.

- Active Modes (AM1 - AM3): £26.7 million - to be developer funded with contributions from local growth fund and Surrey county council

- Electricity and Gas: (EG1) £30 million - to be funded by UK Power networks, SSE and developer funded

- Electricity and Gas: (EG2 - EG7) - Cost to be determined but likely to be significant to be funded by developers and UKPN.

- Water Supply: (WS1 - WS5) - Cost to be determined and funded by developers.

- Wastewater connections and treatment: (WCT1 - WCT6) - Cost to be determined and funded by developers and Thames Water.

- Flood risk reduction: (FRR1 - FRR3) - Cost to be determined and funded by developers

- SANG1 - SANG 12 - £62 million plus cost of SAN 9-SANG 12 to be determined and funded by developers.

- Open Space (OS1 - OS6) - Cost to be determined and funded by developers.

- Education (EYED2) - Cost to be determined and funded by developers.

- Primary Schools (PED 2 - PED7) - £24 million plus costs to be determined for PED6 / PED7 and funded by developers.

- Secondary Schools (SED1 - SED5) - £50 million plus costs to be determined for SED5 and funded by developers.

- Emergency services (ES1) - £100 million to be developer funded.

- Health and social care (HSC1 - HSC6) - yet to be fully costed and contributions from developers to be determined.

- Community Facilities include:

  - CMH1 to CMH3 - cost to be determined and developer funded

- Waste transfer facility (SARP 1 - SARP3): £270 million loan to be repaid by developer (or alternatively £90 million depending on how the schedule is interpreted).

2.32 The reason for listing the above in detail is so that the total costs can be assessed and considered whether they are realistic and can be funded by developers/relevant authorities, rather than at the expense of the public purse.

2.33 First, it is not possible to provide an overall total as many material items have not had a cost determined yet. It is difficult to understand how the Plan can be approved and considered sound, deliverable and effective without knowing the full costs and how they will be funded.

2.34 However, the above figures show (taking the maximum number when a range is shown) of £1.712 billion and this excludes those items above which are yet to be costed and which will increase this amount significantly. It is not at all clear that these costs can be funded.

2.35 In particular consideration needs to be given to the cost of the projects which is anticipated are to be funded by Highways England and the developers. Highways England are dealt with separately, and this next section deals with the funding that it is anticipated will be met by the Developers.

2.36 Unfortunately, Appendix C does not provide sufficient detail to ascertain what the total commitment of the developers will be because (i) some of the items are not fully costed, and (ii) some of the items identify that a contribution will be required from the developers without specifying what that cost will be. It is clear though that the developers of the allocated sites will be required to make enormous contributions which (given the qualification mentioned above) can be summarised as follows:

- Transport Rail: £20 million being specific developer funded as well as developer funding contributing to NR1 (£100 million).

- Transport Strategic Roads: £30 million being specific developer funded as well as developer funding contributing to SRN2 / SRN3 / SRN5 (£300 million to £750 million).

- Transport Local Road Networks (LRN1 - LRN25): £73 million to £88 million to be funded by the developers.

- Park and Ride (P&R1): £7.5 million to be funded by the developers.
• Sustainable Movement Corridor (SMC1 - SMC6): £80 million to £90 million to be funded by the developers (assuming only modest contribution from the local growth fund).
• Bus Transport (BT1 - BT2): £5.25 million to £10.25 million to be developer funded.
• Bus Transport (BT3 - BT6): Not yet costs - to be developer funded.
• Active Modes (AM1 - AM3): £26.7 million - to be developer funded with contributions from local growth fund and surrey county council
• Electricity and Gas: (EG1) £30 million - to be funded by UK Power networks, SSE and developer funded
• Electricity and Gas: (EG2 - EG7) - Cost to be determined but likely to be significant to be funded by developers and UKPN.
• Water Supply: (WS1 - WS5) - Cost to be determined and funded by developers.
• Wastewater connections and treatment: (WCT1 - WCT6) - Cost to be determined and funded by developers and Thames Water.
• Flood risk reduction: (FRR1 - FRR3) - Cost to be determined and funded by developers
• SANG1 - SANG 12 - £62 million plus cost of SAN 9-SANG 12 to be determined and funded by developers.
• Open Space (OS1 - OS6) - Cost to be determined and funded by developers
• Education (EYED2) - Cost to be determined and funded by developers
• Primary Schools (PED 2 - PED7) - £24 million plus costs to be determined for PED6 / PED7 and funded by developers.
• Secondary Schools (SED1 - SED5) - £50 million plus costs to be determined for SED5 and funded by developers.
• Emergency services (ES1) - £100 million to be developer funded.
• Health and social care (HSC1 - HSC6) - yet to be fully costed and contributions from developers to be determined.
• Community Facilities include:
  • CMH1 to CMH3 - cost to be determined and developer funded
  • Waste transfer facility (SARP 1 - SARP3): £270 million loan to be repaid by developer (or alternatively £90 million depending on how the schedule is interpreted).

2.37 As mentioned above, Appendix C does not allow a specific number to be attached to the “developers’ financial obligation” but even taking a prudent assessment of the figures above, the total appears to be likely to be well in excess of £500 million (if the waste transfer facility costs is £90 million in aggregate) and £700 million (if the waste transfer facility costs are £270 million in aggregate).

2.38 The majority of these costs will have to be met by the large strategic sites. Therefore (if affordable homes are to be excluded) the developers will have to contribute significantly more that £100,000 per home (and maybe closer to £150,000 per home) as their contribution towards the infrastructure costs. This is considered excessive and considerably more than comparative figures for any other boroughs that have undertaken local plans.

2.39 The Infrastructure Delivery Plan (IDP) is clear that many of the costs of the infrastructure necessary to support the Plan are still unknown. The IDP also highlights that much of how the infrastructure will be funded is also unknown. We consider that there is not sufficient information regarding the cost of infrastructure and how this will be secured to result in a viable IDP. This undermines the soundness of the Local Plan.

2.40 It is a statutory requirement that all designated sites are viable and specifically (to quote from the glossary of terms) that “a site is said to be viable if after taking account of all costs it provides a competitive return to the developer and generates a land value sufficient to persuade the land owner to sell the land for the development proposed”. It seems unlikely that all (or indeed any of) the allocated sites are viable given the infrastructure burden imposed upon them.

2.41 Furthermore, it is unclear from the Local Plan what assurances the Council has obtained that the developers will be able to provide the funding both with regards to quantum and timing.

2.42 As is made clear in the Local Plan, it is necessary for all the infrastructure to either be built before the development can commence or adequate financial guarantees obtained that any future commitments will be funded. It would have been helpful if the Local Plan had confirmed the due diligence that has been undertaken to ensure that the appropriate funding / guarantees will be available on the required timetable.

2.43 In our July 2016 representations, we flagged the above issues in outline and confirmed that the Onslow Park site had very few infrastructure requirements. This has further been confirmed by Highways England and Surrey County Council.
2.44 It remains therefore our position that a number of the sites proposed for allocation, particularly those in less sustainable locations, have material problems associated with regards to suitability, sustainability, viability and deliverability and that the changes made to this iteration of the plan have not adequately addressed these concerns. Those that are urban extensions bear an infrastructure burden compounded by the less sustainable sites and suggests that a more considered spatial strategy that focuses on minimising infrastructure requirements and targeting such investment in or adjacent to the urban area would provide a more sustainable approach.

**Infrastructure and Delivery Section (Highways England): Policies ID1-4 + A1-59**

2.45 Furthermore, the changes to the Infrastructure Schedule (Appendix C) show that it is proposed that Highways England will fund several projects (with a possible cost per appendix C of up to £755 million). Highways England have as of today only approved to fund one of the projects and it seems unlikely they will be able to fund the other projects given the quantum requested and the funds available to Highways England.

2.46 The costs in appendix C which have been allocated to Highways England totals between £305 million and £755 million. It is surprising that there is such a large range in the costs. The pertinent points to note here are as follows:

2.47 In a meeting of the Guildford Borough, Economy and Infrastructure Executive Advisory Board held on 9th January 2017, the Board received a presentation from Hugh Coakley (Project Manager, Highways England) and Graham Bown (Atkins Global, consultant for Highways England) about the possible options for improving junction 10 of the M25. This confirmed that SRN5 (the A3 / M25 works) were planned to be undertaken with completion scheduled for 2023 (not 2022 shown in Appendix C).

2.48 However, the key points to note are that Highways England confirmed in the meeting that these were the only works authorised to be undertaken during the period to 2023.

2.49 The minutes record that the Board “were disappointed that improvements to the A3 at Guildford had no definite timescale”.

2.50 The minutes further record that the Guildford Borough, Economy and Infrastructure Executive Advisory Board noted that they “feared that existing levels of congestion around Guildford would be worsened when junction 10 was finished.”

2.51 It is therefore reasonable to question, given this concern, why this draft of the Local Plan has included strategic sites which will add to the A3 congestion level around Guildford.

2.52 The most recent Annual Report and Accounts of Highways England to 31st March 2016 confirms that the M25 / A3 junction works are the only authorised works that have been approved (see page 40 committed projects) in the next five years from the date of that report.

2.53 There is therefore a material doubt that SRN2 and SRN3 can or will be funded by Highways England within the timetable shown, or indeed ever, and in the meantime, there is likely to be more congestion around Guildford.

2.54 As a result of the above, it would seem sensible to review the proposed strategic sites, all of which increase traffic and put pressure on the A3 and M25.

2.55 If, as may well be the case, Highways England do not approve any further works other than the A3 / M25 junction works then the strategic sites cannot be developed and the Plan cannot be delivered and therefore is likely to be found unsound.

2.56 The proposed cost that Highways England is being requested to fund in Appendix C could total £755 million on four separate road improvement schemes. This figure needs to be put into the context of an annual spend on road improvements by Highways England in the whole of England in the year to 31st March 2016 of £1.1 billion (source: The Annual Report and Accounts of Highways England to 31st March 2016 - section 6 page 28). The local plan envisages that two of the road improvement works (cost up to £500 million) will be financed by Highways England prior to 2022 with the other 2 projects being completed before 2027. It seems highly unlikely that Highways England will be able to allocate such large sums to these local projects as it would involve a disproportionate amount of each annual budget being allocated to
these road improvements over a number of years. Indeed, Highways England would seem to have effectively confirmed this in their presentation to the Guildford Borough, Economy and Infrastructure Executive Advisory Board held on 9th January 2017 referenced above.

2.57 Onslow Park has no significant strategic highways or infrastructure requirements.

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

Attached documents: 170724 Onslow Park Reps targeted consultation on LP with app.pdf (2.4 MB)

Comment ID: pslp171/2600  Respondent: 17463841 / The Earl of Onslow and the Trustees of the Clandon Estate
Agent: WYG Planning (Sarah Evans)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

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

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

2.62 We note the inclusion of the AGLV within the terms of policy P1 and the proposed amended wording. While the changes themselves are limited in nature, we would have to question the continued relevance of the AGLV in light of the comprehensive landscape character assessments of the Borough carried out as part of the Local Plan review, developments since the original designation as a buffer to the AONB, the identification of landscape character areas to help guide consideration of landscape change and in the knowledge of the reappraisal of the AONB boundary which all reduce its relevance. The protection and enhancement of landscape character and distinctiveness is better served by the landscape character assessments at an individual level.

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

Attached documents:

Comment ID: pslp171/2581  Respondent: 17463841 / The Earl of Onslow and the Trustees of the Clandon Estate
Agent: WYG Planning (Sarah Evans)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
2.3 The changes made to the overall housing needs for the period to 2034 (changed from 2033) (a reduction from 13,860 to 12,426) is not justified and in fact the housing needs number should have been increased not decreased.

2.4 The revised OAN evidence base is not therefore, considered sound or justified and the resulting plan provision will not be compliant with the NPPF, the Local Plan will not be sound or effective and will not meet the needs of the Borough.

2.5 The first point to note is that the period has been extended to 2034 and therefore the number of homes required should include both the additional year’s need of housing and the deficit in housing built up in 2014 and 2015 which has accrued as a result of the delay.

2.6 Second, the population assumptions prepared by ONS have not changed since the previous iteration of the Local Plan. Indeed, statistics released since July 2016 point to an acceleration in the population with actual populations exceeding the 2014 forecasts. Therefore, prima facie, the housing need should have been amended upwards.

2.7 Third, the plan does not deal specifically with the on-going shortfall of houses that have not been built in recent years and which should have been included in the calculation of the housing needs. It is of course imperative that this shortfall is addressed at the outset of the period, using the Sedgefiled method, placing great urgency on identifying sites which can be delivered promptly. The proposed changes to the Plan do not identify such sites or deal with this problem.

2.8 This problem is illustrated in the housing trajectory proposed at Policy S2. Even with the lower commitment to house-building as proposed through the changes, the housing trajectory shows that the proposed level of house-building would not meet an annualised supply until 13 years into the 19 year plan period. In practice, this means that for at least the two thirds of the plan period, the house building will not meet the needs of the population. This consideration of annualised need does not take into account the need to deliver homes faster to meet previous deficits or the higher levels of ONS projections within the first half of the plan period, which further compound the need not to delay the building of homes. This undersupply caused by the slow rate of infrastructure delivery associated with major sites indicates that greater effort should be directed towards delivering sites that can contribute to supply in the early years of the plan, such as Onslow Park.

2.9 Fourth, although the Housing White Paper published earlier this year is yet to be incorporated into legislation, it would have seemed sensible for Guildford to have given consideration to it prior to publishing this draft local plan. It is clear that the increased housing stock that central government wishes to see built will impact on councils such as Guildford who will need to increase the number of homes to be built significantly.

2.10 Fifth, it is noted that the plan makes no allowance for meeting housing needs from elsewhere in Surrey. This is a significant factor in the HMA and merits further consideration as the unmet needs within the HMA are potentially cumulative and material.

2.11 The updated evidence base includes economic assessment which projects economic growth will not be as strong as previously predicted. We contest this assessment which does not consider growth elsewhere within the housing market area, and the conclusion to plan for less homes because of economic uncertainty. The plan embarks on this unsound strategy, to plan for less homes, just in case the economy is not as prosperous as previously projected. Instead, the borough should be proactively planning to meet its needs.

2.12 The assessment of environmental constraints hasn’t been properly undertaken in the context of the proposed modifications. A larger amount of Green Belt land can be released than Plan intends to. The plan fails to release Green Belt for sites to be delivered early in the plan period, as well as towards the end of the period and beyond. We recognise the aspiration to deliver strategic infrastructure in the borough to serve development within and outside the borough, but this does not negate the responsibility or the need to plan for homes in the early part of the plan period.

2.13 It is interesting to note that Mid Sussex’s local plan has recently been subject to a review by the Inspectors appointed by the Secretary of State. Whilst it is accepted that no two boroughs are identical and that different factors determine the appropriate numbers of new homes that are required to be built, there are interesting similarities between Guildford and
Mid Sussex which suggest strongly that this iteration of the Local Plan materially understates the housing needs of the borough of Guildford. To expand:

- Mid Sussex actual population 2014: 144,000
- Guildford population actual population 2014: 143,000
- Mid Sussex population forecast 2034: 169,000
- Guildford population forecast 2034: 167,000
- Population increase 2014 to 2034 (Mid Sussex.) 25,000 being 17%
- Population increase 2014 to 2034 (Guildford) 24,000 being 17%

2.14 Other key factors such as current housing stock, housing shortfall, net migration, births, deaths, affordability, shortfalls from adjoining boroughs, including Woking, and economic factors are considered to be broadly similar.

2.15 At the hearings in early 2016, the Inspector at Mid Sussex decided that the Council’s proposed number (700 new dwellings per year) was insufficient and determined that 1,026 new dwellings were required. There are also lessons to be learned from the Local Plan examination in Waverley, which also clearly suggest that housing needs must be met. The Inspector for Waverley concluded that Woking’s unmet needs should be met within the HMA (including both Waverley and Guildford), and suggested that Waverley should look to plan for an additional 150 dwellings per year.

2.16 It seems highly likely that similar conclusions will be drawn by an Inspector when assessing the housing needs for Guildford and that the number of new homes required will be increased significantly. It is also likely that the Inspector will wish to see the homes being delivered in the early part of the plan (when population growth is at its most rapid) to meet the genuine needs of the area and not store problems for the future and will therefore, want to ensure that the issue of housing need and affordability is properly addressed.

**Timing of Housebuilding: Policy S2**

2.17 The Office of National Statistics shows that the anticipated population growth in the Guildford Borough will be quickest in the early period of the review and yet the local plan has incorrectly back ended the delivery of the homes. A situation which has been exacerbated by the changes in the plan.

2.18 The first point to note is that the Local Plan assumes a linear increase in population from 2015 to 2034. In fact, the population is forecast to grow quickest at the beginning of the period under review (with over 50% of the increase anticipated by 2022). Source: ONS 2014 based subnational population projections.

2.19 It would therefore be most appropriate if the delivery of houses was planned to be higher in the early years of the plan period. Unfortunately, the proposed amendments to the plan fail to take account of this, and indeed the Local Plan states that the number of houses to be built in the early years of the plan (given this choice of strategic sites) will be less than the number built towards the end of the plan.

2.20 This problem of delivery of homes in the early years of the Plan arises as a result of the Plan incorrectly relying for its delivery of homes on a small number of large sites, some in unsustainable locations, that in themselves require significant up-front infrastructure investment and delivery.

2.21 There is no need for this shortfall in the early years to be the case. For instance, as has been confirmed by our earlier representations, Onslow Park can complement the strategy of the Local Plan which focuses development around Guildford as the primary town, and boost early years’ supply as a result of the ability for the Onslow Park site, to be developed much more quickly than the other proposed sites and deliver significant housing numbers and social infrastructure in the early years of the plan. Sites which adjoin the urban area and benefit and contribute to the services and facilities of the town are inherently more sustainable, deliver greater accessibility and public benefit and are easier served.

2.22 To compound the problem, it seems almost certain that even if some of the problems (particularly with regards to infrastructure and viability) that affect the largest sites included in the draft plan can be resolved, development of these sites will almost certainly be towards the end of the Plan period under review. This is acknowledged to some degree in the consultation which notes that certain sites deliver some of the identified homes beyond the plan period.
2.23 If reference is made to sites A24, A25, A26, A29, A35 there is no confirmation that any of these homes (together totalling 7,950 of the proposed homes and representing 64% of the total housing envisaged for the period) can be built before 2022. Indeed, it is stated that they will be built “during the plan period” and only after the infrastructure identified in Appendix C has been completed.

2.24 The allocation of Onslow Park could therefore both (i) provide the delivery of houses in the early years of the plan and thereby correct the problem with the existing plan that has a shortfall in the early years and (ii) help the delivery of infrastructure to Guildford (such as the extending the existing park and ride on site) which would complement the social and other infrastructures to be provided by the other urban extensions to Guildford.

New Housing Projections: Policy S2

2.25 Actual growth in population in Guildford (last release by ONS 22 June 2017) is in excess of the forecast ONS 2014 sub national predictions which are the basis of the calculation of the housing numbers, with the actual 2016 population being 148,020 compared to a forecast of 147,400, implying that the housing needs number (particularly in the early years) should have been increased upwards, not downwards.

2.26 It should be noted the ONS has just released new figures (in June 2017) that include their estimates for the change in the population of Guildford for the period June 2015 to June 2016. This shows in the 12-month period the population grew from 146,080 (June 2015) to 148,020 (June 2016). This increase (of 1.3%) is considerably higher than the forecast figures previously produced in 2015 and on which the Local Plan has been based.

2.27 The ONS 2014 sub-national population projections predicted that the mid 2016 population of Guildford would be 147,400. The actual 2016 figure of 148,020 therefore shows the population has grown by 620 more than forecast within a two-year period. This is a significant overshoot within a very short order.

2.28 Although these recently published statistics were not available when the targeted changes to the Local Plan were prepared they need to be given proper emphasis now for two reasons: First, this actual (not projected) increase requires a significant increase in the number of houses which are needed to be built now and in the early years of the plan; and it seems there is a trend of population growth in Guildford continually exceeding projections. It therefore seems likely that (at least in the next few years) the actual increases in population will continue to exceed the projections resulting in an ongoing requirement for more houses.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

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

Attached documents: 170724_Onslow_Park_Reps__targeted_consultation_on_LP_with_app_Redacted.pdf (2.4 MB)
ONSLOW PARK

1.4 It was our expectation that the Council, after assessing our representations, would concur that Onslow Park was a suitable and sustainable site, particularly bearing in mind the material issues associated with the other sites identified, and that consequently Onslow Park would be included in the Guildford Borough Proposed Submission Local Plan: strategy and sites (2017).

1.5 The Earl of Onslow and the trustees of the Onslow Estate are therefore disappointed that this was not the case and would like to explain further in this representation letter why they have concerns that the changes now proposed to the Local Plan are not appropriate changes in the context of the relevant policies and other material considerations.

1.6 Furthermore, the Earl of Onslow and the Trustees of the Onslow Estate would like to re-iterate their willingness to engage with Guildford Borough Council to make the Onslow Park site available for development if it transpires that further revisions are required to be made to the Local Plan before it is finally adopted.

1.7 We would note that the following should be taken as objections to the amendments made to policies S1 and S2, including the Spatial Vision, which in terms of both the level of housing proposed and the spatial strategy adopted fails to meet the needs of the Borough or promote a sustainable spatial strategy that minimises the need to travel (particularly by car) and the impact on climate change.

1.8 We would also note that the detailed changes to paragraph 4.1.8 maintain the failure to place emphasis on sustainable urban extensions as being inherently more sustainable than development in smaller villages or the promotion of new or expanded settlements and hence also constitute an objection to the nature and extent of changes proposed.

2.1 As described in the introduction, and in compliance with your request that representations focus on the changes made from the 2016 draft plan to the 2017 revised draft, we wish to make the following representations:

• The changes made to the overall housing needs for the period to 2034 (changed from 2033), being a reduction from 13,860 to 12,426, is not justified and in fact the housing needs number should have been increased not decreased to reflect the true level of housing need within the Borough.

• The Office for National Statistics project that the anticipated population growth in the Guildford borough will be quickest in the early period of the review, and yet the emerging Local Plan proposes, incorrectly, to back end the delivery of homes. The later delivery of homes has been exacerbated by the proposed changes to the Plan.

• Actual population growth in Guildford (last release by ONS 22 June 2017) has surpassed the forecast ONS 2014 sub national predictions, which are the basis of the calculation of the housing numbers, with the actual 2016 population being 148,020 compared to a forecast of 147,400, implying that the housing needs number (particularly in the early years) should have been revised upwards, not downwards. The evidence base has not been updated to take account of the two latest sets of population estimates released by ONS, and as such is outdated.

• The changes made to the Infrastructure Schedule (Appendix C) cast significant doubts on the deliverability and viability of both the Local Plan itself and the large allocated sites (which account for 64% of the anticipated housing supply).

• Furthermore, the changes to the Infrastructure Schedule (Appendix C) show that it is proposed Highways England will fund several projects (with a possible cost per appendix C of up to £755 million). Highways England have as of today only approved to fund one of the projects and it seems unlikely they will be able to fund the other projects given the quantum requested and the funds available to Highways England.

• The allocation of a number of sites has the effect of requiring the provision of significant and costly infrastructure necessary to support these sites which demonstrates the unsustainable spatial strategy of this draft of the local plan. Much of the cost of this infrastructure will be met from the public purse. A more sustainable spatial strategy focused on Guildford would require much less costly infrastructure, saving public funds and allowing further investment in the town that would be of wider public benefit.

• The changes made to the strategic site allocations are inappropriate as they include sites which do not meet important criteria which should be considered in determining appropriate sites. We contend that proper and balanced consideration should have resulted in the allocation of Onslow Park in the Plan.

2.2 Each of these matters is dealt with in greater detail below.
Strategic Site Allocations: Policies S1 & S2 + Site Allocation Policies A1-A9

2.58 The proposed changes to the strategic site allocations include sites which cannot be considered deliverable (as defined by the NPPF at para 47, footnote 11). Proper consideration in determining the appropriate sites to be allocated should have resulted in the inclusion of Onslow Park, which can be considered deliverable as per the NPPF definition, as it is:
- Available now and can be delivered within five years of permission;
- Represents a suitable location for development now which adjoins the Guildford urban area; and
- Lacks development constraints, and so is viable.

2.59 Our representation of July 2016 (attached as an appendix to these representations, and which remain relevant) identified the compelling reasons why that draft of the local plan included inappropriate strategic sites and should be amended to include Onslow Park. It is our position that the changes made have not addressed the issues that we identified, namely:

- **SUSTAINABILITY**: Onslow Park is a sustainable urban extension (to be built on the principles of a garden village). Sustainability should be a key factor in determining the appropriate sites and for the reasons included in our previous representations and prospectus document, it is maintained that Onslow Park would be more sustainable than many of the allocated sites. We also consider the weight attached to sustainability should be greater in the assessment of options undertaken as part of the Sustainability Appraisal. As a result of this, we believe Onslow Park should have secured an allocation in this draft of the local plan.

- **GREEN BELT RELEASE**: In determining which sites should be released from the Green Belt, there are clear national guidelines that should be taken into account. High priority should be given to the permanence of creating strong defensible boundaries. A number of allocated sites for Green Belt release do not benefit from existing strong boundaries which would prohibit logical release. Onslow Park benefits from strong defensible boundaries in the form of Guildford urban area, the A25 and mature woodland. As such, its release would be logical and help effectively maintain the permanence of the Green Belt through the prevention of urban sprawl.

- **PREVIOUS DEVELOPMENT**: The Onslow Park site has already been considered and granted certain development permissions including the existing park and ride site (which was built on the site and is part of the green belt), the sports and health club, the car park, the machinery sheds and the golf course.

- **INFRASTRUCTURE REQUIREMENTS**: We have submitted traffic studies and correspondence from Highways England and Surrey County Council that establishes that little traffic work is required and importantly development at Onslow Park will not put a further burden on the A3. The information shows the allocation would work well in conjunction with Gosden Hill allocation and performs equally well. The other strategic sites have costly and uncertain infrastructure obligations and as such Onslow Park would make a more suitable strategic site.

- **AFFORDABLE HOUSING AND PRIVATE RENTAL STOCK**: We have suggested that Onslow Park could have a higher allocation of affordable housing and rental stock to assist Guildford in meeting its needs in this important area. The West Surrey SHMA (September 2015) sets out that Guildford has the greatest unmet affordable housing need within the housing market area, of 1,313 dwellings. The latest Annual Monitoring Report and the 2017 addendum to the SHMA show that affordability issues continue to worsen. The Council should be increasing the delivery of housing and affordable housing to help tackle this issue, which is contrary to the proposed amendments to the Plan. It is not clear that the changes made to the local plan have addressed this issue from Guildford’s perspective, particularly with regards to the early years of the plan. Onslow Park has the potential to increase significantly the provision of specialist forms of housing for the elderly and private rented, discount market rented and starter homes as well as family homes.

- **SOCIAL INFRASTRUCTURE**: Whilst all allocated sites have some degree of social infrastructure and there have been certain changes made in this draft of the plan, none of the allocated sites can match the social infrastructure proposals of Onslow Park, particularly as its proximity to Guildford would allow Guildford town residents to enjoy the of sports, education, recreation and other facilities and vice versa.

- **DELIVERY**: As detailed in these representations, there are likely to be significant constraints on the certainty and rate of deliverability of some of the 5 largest strategic sites included in the local plan (which account for 64% of the housing
supply included in the plan). The changes made to the plan have not improved the issue of deliverability, and therefore it is important include Onslow Park and achieve relative certainty of delivery of homes in the early stages of the Plan.

2.60 We note the sustainability appraisal has been updated as part of the current consultation. However, of the options and scenarios tested, although a number support the inclusion of Onslow Park, the way the options are construed does not reflect the level of housing need we consider should be provided and in addition are structured in such a way as to not allow for the proper consideration of Onslow Park as an alternative to one or more of the proposed sites which are considered simply as part of the baseline. The study also assumes a generally increasing level of impact pro-rata to the level of development proposed. This is not likely to be the case as sites in less sustainable locations or which impact on national or international level sites and designation will by definition have a greater impact and be less sustainable.

2.61 The assessment also fails to properly reflect the beneficial effect of locating development close to the urban area, where mixed use development can contribute in broad terms to economic, social and environmental infrastructure and achieve a wider public benefit.

3.2 We conclude that the proposed amendments to the plan fail to make it sound. As presently drafted, the plan would be ineffective at meeting the boroughs housing and infrastructure needs for the first two thirds of the plan period. A review of sites selected through the spatial strategy and sustainably assessment should be undertaken.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

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

Attached documents: 🗄 170724_Onslow_Park_Reps_targeted_consultation_on_LP_with_app_Redacted.pdf (2.4 MB)
There is no question that housing development requires suitable infrastructure such as good public transport and access to it, a good road network for access, safe pedestrian and bicycle routes, sewerage, drainage, telecoms and basic facilities.

Although some of the sites identified in the local plan fulfil a majority of these needs, some fail to cover any in a sustainable way.

I am not a nimby as recently reported by a senior Government minister as I do feel that housing, particularly affordable housing is a high priority generally but to put it somewhere that fulfils the need but fails to satisfy any basic planning rules, is at best lazy and at worst driven by political dogma rather than sensible thought.

I therefore fundamentally object to the adoption of the current draft of the local plan and in particular, to the ludicrous inclusion of Three Farms Meadows, as a sensible option for satisfying the important need for new housing.

I also object to the number of houses that are projected to be required in the Guildford area, as I believe that this has been calculated using outdated and inaccurate information.

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

**Attached documents:**

**Comment ID:** pslp171/2617  **Respondent:** 17464577 / John Patterson  **Agent:**

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

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

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

I am dismayed that the revised Local Plan 2017 has not heeded the objections and concerns of residents that were sent to the 2016 Local Plan!

I believe that the new evidence submitted is flawed and that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of the Green Belt and green character and increased congestion, that cannot be justified in our heavily constrained borough.

I suggest that you take a drive around the Guildford bypass and the A3/M25 junction on a Monday morning then ask yourself just how many more homes (and therefore cars!) the area can take

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

**Attached documents:**

**Comment ID:** pslp171/2618  **Respondent:** 17464577 / John Patterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
I am dismayed that the revised Local Plan 2017 has not heeded the objections and concerns of residents that were sent to the 2016 Local Plan!

I believe that the new evidence submitted is flawed and that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of the Green Belt and green character and increased congestion, that cannot be justified in our heavily constrained borough.

I suggest that you take a drive around the Guildford bypass and the A3/M25 junction on a Monday morning then ask yourself just how many more homes (and therefore cars!) the area can take

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

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

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

The Site is currently vacant brownfield land within Guildford College Campus. Please find a red line site plan enclosed (Enclosure 1). The Site was last used by the College for Construction and Engineering buildings in excess of 18 months ago and have been vacant ever since.

The land has now been declared as surplus land by the College and as such, the College fully support the principle of the redevelopment of the Site.

Following a period of marketing, no alternative community based uses identified an interest in the whole of the site, with the exception of a nursery (circa 150 sqm), all interest came from alternative uses, including student accommodation.

Guildford has the largest population of all Surrey towns and has a high concentration of learning institutions. These include the University of Surrey, Guildford School of Acting, the University of Law, Guildford College, the Academy of Contemporary Music and the School of Horticulture at RHS Wisley.

The West Surrey SHMA (2015) estimates that the University of Surrey expects a growth of up to 6,300 additional student’s over the period to 2033 with 3,300 additional students over the next decade.

The Site therefore represents an important development opportunity to provide student accommodation in Guildford. Redeveloping the site would also make the best use of an available site which is previously developed land.

An application for planning permission for the redevelopment of the Site for student accommodation was submitted in March 2017 (17/P/00509) on behalf of our client, and proposed the following:

“Demolition of existing buildings and redevelopment to provide purpose built student accommodation with 553 bedspaces, 149 sqm D1 floorspace, 969 sqm of student amenity space including a gym and student hub and associated works”

Following extensive consultation with the LPA and interested parties, amendments were made to the pending planning application in June 2017. As a result of the submitted amendments, the scheme will now deliver 527 units.

This application has not yet been decided by GBC.

Policy A18 of the Proposed Submission Local Plan: Strategy and Sites 2017 allocates the site for 200 student beds spaces and at least 500 sqm of D1 floorspace. This is an amendment from the 2016 consultation of the Proposed Submission Local Plan: Strategy and Sites, which identified the site as having capacity for 100 homes.

We welcome the inclusion of the Site as one of the draft allocations identified to deliver student accommodation plus D1 floorspace, and we support the Council’s recognition of the Site’s suitability for student accommodation. However, we consider that the proposed allocation does not optimise the Site’s redevelopment potential and we therefore object to the aforementioned capacity.

The detailed planning application that has been submitted has been informed by a robust design process, having regards to all the opportunities and constraints of the site. Consequently, we consider that any allocation should more appropriately identify the site’s capacity as circa 527 bedspaces.

The Site is brownfield land and the NPPF seeks to optimise the redevelopment of brownfield land. In addition, the Council state a key objective of the Plan is to maintain the extent of Green Belt land. The redevelopment of brownfield land, would promote this objective and help ensure the identified student housing needs are met in the most sustainable way.
Section 6 of the NPPF seeks to deliver a wide choice of high quality homes, with paragraph 47 seeking to boost the supply of housing. This is reiterated in the plan as a key objective of the proposed Plan is to deliver new housing. Draft Policy H1, ‘Homes for all’, specifically states that this includes housing for students.

The delivery of purpose built accommodation will therefore reduce the reliance on HMO’s and will have the additional benefit of alleviating pressure on Guildford’s private housing market, which is an important factor given that the Council have an identified need for both student accommodation and private market housing.

In addition there is an identified need within the Borough for student accommodation and increasing the capacity of this allocation would better optimise the development potential of a previously developed site.

As such, in accordance with the NPPF and indeed the Councils own proposed policies, the proposed site allocation identifies a missed opportunity to fully utilise the redevelopment potential of the Site and as such, we would suggest an increased capacity circa 527 units would be appropriate, which reflects the currently pending application.

We do, however, have concerns that the Plan does not identify the full potential of the Site as an allocated site to deliver student accommodation. We consider an increase in the allocated capacity to be a significant benefit to achieving the Council’s need for student housing, whilst also alleviating pressure on the Council’s need for housing.

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

Attached documents: [Local_Plan_Strategy_and_Sites_2017_Representations.pdf](https://example.com) (445 KB)

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**Comment ID:** pslp171/2643  **Respondent:** 17466593 / Woodcock Bros Wimbledon Limited (Sir or Madam)

**Agent:** Woolf Bond Planning (Thomas Rumble)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

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

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

Paragraph 54 of the NPPF refers to rural exception sites as follows:

> ‘In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs’.

The final sentence of the above quotation refers to the potential for some market housing to be allowed to facilitate affordable housing delivery. This is also referred to in the Plan itself at paragraph 4.2.52. We therefore propose that the following additional bullet point is added to Policy H3:

• ‘market housing will be allowed where it has been proved that is necessary to make the affordable housing provision viable’

The above wording would enable Policy H3 to be more consistent with national policy in accordance with the NPPF tests of soundness.
Proposed Change:
The addition of the wording suggested above.

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

The final sentence of the above quotation refers to the potential for some market housing to be allowed to facilitate affordable housing delivery. This is also referred to in the Plan itself at paragraph 4.2.52. We therefore propose that the following additional bullet point is added to Policy H3:

• ‘market housing will be allowed where it has been proved that is necessary to make the affordable housing provision viable’

Attached documents:

Comment ID: pslp171/2642  Respondent: 17466593 / Woodcock Bros Wimbledon Limited (Sir or Madam)
Agent: Woolf Bond Planning (Thomas Rumble)

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

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

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

We object to the overall housing requirement on the basis that it fails to adequately reflect the Borough’s true objectively assessed housing need, make an appropriate adjustment for market signals or generate a 5 year housing land supply for the Borough. We also object to the proposed phasing of the annual housing target.

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

Attached documents:

Comment ID: pslp171/3525  Respondent: 17466593 / Woodcock Bros Wimbledon Limited (Sir or Madam)
Agent: Woolf Bond Planning (Thomas Rumble)

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

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

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

Suggested Residential Opportunity at Former Highlands Nurseries, Portsmouth Road, Ripley
My client controls land at the former Highlands Nurseries, Portsmouth Road, Ripley site extending to approximately 1ha. The attached Location Plan shows the extent of the site and context of the surrounding area. In addition, a satellite view of the site is provided below.

(IMAGE)
The site comprises vacant land previously used for nursery purposes, located in the Green Belt. It is not presently in any private or publicly beneficial use. It forms a field contained on its western side by existing vegetation and on its northern and southern sides by residential properties fronting onto Portsmouth Road. It benefits from an existing vehicular access direct onto Portsmouth Road and lies between the settlements of Ripley and Send Marsh. The site is located entirely in Flood Zone 1 and unlike much of Ripley Parish is not located in the Conservation Area or in close proximity to any listed buildings.

Proposals

These representations are accompanied by the following drawings:

- Location Plan
- Site Plan
- Typical Street Scene.

The proposed scheme includes 7 no. affordable dwellings as part of the overall 20 no. dwellings proposed. The illustrative mix underpinning the proposed site plan comprises:

- 2 no. 1 bedroom affordable maisonettes;
- 2 no. 1 bedroom affordable apartments;
- 3 no. 2 bedroom affordable apartments;
- 6 no. 3 bedroom market semi-detached houses;
- 1 no. 3 bedroom market detached house; &
- 6 no. 4 bedroom market detached houses.

The above housing mix enables the provision of a high proportion of the site to come forward as affordable accommodation, whilst providing a mix of housing sizes, tenures and types such that a mixed community could form.

The layout plan shows 20 no. dwellings proposed in a verdant landscaped setting. The use of the existing access point enables the retention of the existing trees on the site’s frontage adjacent to Portsmouth Road. As illustrated further landscaping can be introduced throughout the development and in particular on the site’s boundaries.

The layout illustrates frontage development that follows the existing building line defined by Thirlestane to the north and Broom House to the south. In this respect, the scheme forms infill development that would read as frontage development located beyond existing trees when viewed from Portsmouth Road. Moving further west, the scheme becomes one of a more conventional low density residential estate, with all dwellings benefiting from generous amenity space and parking provision.

The street scenes provided show the proposed dwellings to comprise two storey development with no rooms in the roofspace, consistent with the prevailing scale in this part of the village. In addition, pitched roofs, gabled features and a variety of materials are proposed so to provide a traditional design and add architectural variety to the development. The site is well contained and is bound by existing residential development. I therefore write to offer the site as a potential allocation for a residential scheme within the emerging Local Plan.

Summary

In summary, the proposed site represents an opportunity to provide a low to medium density housing development on a self-contained site bound by existing residential

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

Attached documents:
- Highlands Nursery - Coloured Site Plan.pdf (1.2 MB)
- Highlands Nursery - Street Scene.pdf (1.2 MB)
- 16-P1258-LP (Location Plan) 10.02.16.pdf (52 KB)

Comment ID: pslp17q/487  Respondent: 17466593 / Woodcock Bros Wimbledon Limited (Sir or Madam)
Agent: Woolf Bond Planning (Thomas Rumble)

The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to be objectively assess development and infrastructure requirements from neighbouring authorities.

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

**Attached documents:**

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**Comment ID:** pslp171/3285  **Respondent:** 17467233 / Guildford College Group (Guildford College Group)

**Agent:** Indigo Planning (Daniel Andrews)

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

The Council’s Green Belt Assessment does not seem to have been revisited since the previous round of public consultation on the Proposed Submission Local Plan and therefore we continue to question the robustness of this evidence base document. We believe if this assessment was undertaken correctly, the conclusion would to allocate Liddington Hall ahead of other sites identified in the emerging Plan.

We continue to raise issues with the:

- Over-reliance on Green Belt sensitivity scoring in Green Belt site selection. The main criticism is that where a land parcel has been assessed as having a high Green Belt sensitivity (in the case of Liddington Hall where it scores 3 out of 4) then the site has been removed as a potential site allocation, whatever the site environmental and or sustainability scoring might be or where it might fall in the Council’s spatial hierarchy;

- Lack of comprehensive and transparent evidence base. We believe the scoring system adopted by the Council is overly simplistic leading to a binary outcome for each Green Belt purpose. No supporting information which explains or qualifies how the conclusions have been reached has been included.

- Incorrect Green Belt Scoring for land at Liddington Hall. Even using this simple methodology adopted by the Council, the Green Belt and Countryside Study has incorrectly scored Liddington Hall (land parcel J1) in respect of two of the purposes of the Green Belt, namely the prevention of Guildford and Fairlands from merging and the restriction of urban sprawl.
Therefore, the Council should re-consider land at Liddington Hall alongside the other Guildford urban extension sites (Blackwell Farm, Gosden Hill farm and Keens lane) having regard to its sustainability or environmental capacity and certainly ahead of allocations such as Wisley (which are lower down the settlement hierarchy and are in less sustainable locations).

We request an amendment to the supporting text to draft Policy 2 as follows:

Para 4.3.15 The following major previously developed sites are now inset from the Green Belt: Henley Business Park, HM Prison Send, Keoghs Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute, the University of Law Guildford and Merrist Wood College.

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

Attached documents: 22680003_Land at Liddington Hall_Part1.pdf (1.2 MB)
22680001_Draft Policy 2.pdf (408 KB)

Comment ID: pslp171/3284  Respondent: 17467233 / Guildford College Group (Guildford College Group)
Agent: Indigo Planning (Daniel Andrews)

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

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

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

The latest Proposed Submission Local Plan sees a reduction in overall housing numbers from 13,860 during the previously proposed plan period 2013-33 (20 years), to 12,426 homes during the plan period 2015-2034 (19 years). The annualised figure is 654 dwellings per annum in the current Local Plan, as opposed to the 693 dwellings per annum previously proposed.

We understand that an update to the Council’s Strategic Housing Market Assessment (SHMA) has led to a revised objectively assessed need (OAN) figure for the borough. We understand that this is primarily as a result of economic growth forecasts suggesting that employment growth will be less than previously anticipated.

The Planning Practice Guidance (PPG) advises that the DCLG’s household projections should provide the starting point estimate of overall housing need. Given that the 2014-based household projections predicts more growth in Guildford than the 2012-based household projections (on which the previous housing targets were based), it does not follow that the overall OAN figure for the borough has been reduced in the current iteration of the Proposed Submission Local Plan.

The updated SHMA (Guildford Addendum Report 2017, prepared by GL Hearn) reports an upward adjust for market signals of just 9%. It is clear that the market signals adjustment to the borough’s OAN should be significantly higher given the acute affordability issues in the borough.

We are also mindful of the Inspector’s criticisms of Waverley Borough Council’s approach to housing numbers during its recent Examination in Public on its Local Plan. Waverley, Woking and Guildford are included with the 2015 SHMA and together comprise the HMA on which the OAN is based. The Inspector was critical of Waverley Borough Council’s approach in addressing unmet housing need from Woking and also expressed concern at the serious problem of affordability. As a result of the Inspector’s comments, housing numbers are being increased from 519 dwellings per annum to 590 per annum.
This approach is wholly at odds with the approach to housing delivery being taken across Surrey, where Local Planning Authorities have identified that their OANs will increase and they are planning accordingly for enhanced growth. Guildford borough directly adjoins these local authority areas, with Guildford continuing to be one of the most popular, but expensive places to live in Surrey. Planning for less housing than previously proposed is counter-intuitive and flies in the face on proactively dealing with the nation’s housing crisis. Guildford Borough Council should be seeking to exceed and not simply meeting the minimum growth requirements of the borough, this is particularly relevant given previous delivery rates.

GBC has also not built in flexibility into the delivery of the housing within the Plan in case some sites do not come forward or do not come forward quick enough.

For these reasons, we consider that the housing target proposed by Guildford Borough Council is wholly inadequate. It fails to meet the Borough’s fundamental housing needs and further, it does not seek to boost significantly the supply of housing, as required by the provisions of the NPPF.

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

Attached documents:

- [22680003_Land at Liddington Hall_Part1.pdf](#) (1.2 MB)
- [22680001_Draft Policy 2.pdf](#) (408 KB)

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**Comment ID:** pslp171/3491  **Respondent:** 17467233 / Guildford College Group (Guildford College Group)  **Agent:**

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

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

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

**Inclusion of Liddington Hall site**

Liddington Hall was removed from the previous Proposed Submission (Regulation 19) version of the Local Plan and has not been re-inserted. We believe this renders the Plan unsound given the council should be planning for more housing and is surprising given that:

- The site is in a sustainable location on the edge of Guildford and within easy reach of the Fairlands Estate.
- It is well-served by local bus routes with good cycling connections to the town centre. It is within walking distance of the local facilities in Fairlands;
- In view of the potential capacity of the site (as acknowledged by the Council) for approximately 600 dwellings, there is the potential to further enhance the connectivity of the site for sustainable modes of transport as part of any redevelopment of the site;
- The existing footpaths already connect the site back in to adjoining residential areas;
- The site is effectively surrounded on three sides by existing development and two streets of existing development extend into the site from Aldershot Road;
- The substantial tree belts and small copses on the western and southern boundary, together with the settlement edges and road corridors on the northern and eastern boundaries establish a sense of containment to the site;
• The site has clear defensible boundaries and an appropriate Masterplan for the site could provide a robust green edge;

• The site has a very limited role in preventing the merging of Guildford and Fairlands;

• The site has only a limited role in containing the sprawl of urban areas;

• The site plays no role in preserving the setting and special character of an historic town;

• The site is not subject to any landscape-related, ecological, archaeological or heritage designations;

• None of the land is high grade agricultural land (predominantly grade 3 with some grade 4);

• The site is not a flood zone;

• The land is under single ownership (the college). The college would be committed to bringing forward the site as soon as the Plan is adopted;

• Residential development of the site would be compatible with adjacent residential land uses;

• There is sufficient existing highways capacity to accommodate development;

• Appropriate access into the site can be achieved; and

• The site is available for development and deliverable within 1-5 years, with no insurmountable obstacles to delivery in terms of infrastructure, highway improvements, ground contamination or ecology.

**Removal of Merrist Wood Campus from the Green Belt**

There is a continuing need to rationalise and modernise the college campus to protect its longevity into the future. The College has suffered from under-investment for a number of years. The College are currently exploring development plans with the council through the pre-application process to expand and modernise the campus. These current development plans will ensure that the college is allowed to maintain and improve its facilities and realise capital funds, to secure its long-term future.

It is therefore important that the emerging Guildford Borough Local Plan allows for the continual evolution and current growth plans for Merrist Wood. Our contention is that the Merrist Wood campus should be inset from the Green Belt as has been proposed for other major developed sites in the Green Belt. The Merrist Wood campus is larger, with more built development than many of the other major developed sites that have been proposed to be inset from the Green Belt. The campus is well contained in the landscape with opportunities on its own land to strengthen defensible boundaries.

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

Attached documents: 22680003_Land_at_Liddington_Hall_Part1(1).pdf (1.2 MB)
22680001_Draft_Policy_2.pdf (408 KB)

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**Comment ID:** pslp17q/672  **Respondent:** 17467233 / Guildford College Group (Guildford College Group)

**Agent:** Indigo Planning (Daniel Andrews)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

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

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)
As with the previous Regulation 19 consultation, we maintain that the Proposed Submission Local Plan is unsound because:

• It has not been positively prepared and it fails to adequately meet Guildford’s housing need or exceed minimum housing requirements;
• It is not based on a robust spatial strategy to meet housing need;
• It is not effective and is unlikely to deliver enough new homes over the Plan period; and
• It is inconsistent with the aims of national planning policy in terms of the presumption in favour of sustainable development.

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

Attached documents:

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Comment ID: pslp172/4319  Respondent: 17467457 / Emily Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

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

I am writing to object to the 2017 proposed submission of the Local Plan.

OBJECTION TO SITES A28 & A29 AND THE PROPOSED CHANGE TO ASH GREEN BOUNDARIES

I believe the title of Policy A28 needs to be corrected to say “Ash Green” not “Ash”.

Policy A28: Land to the east of White Lane, Ash GREEN, states it requires
“(2) Sensitive design at site boundaries that has regard to the transition from urban to rural
(3) No unacceptable impact on trees and ancient woodland
(4) Recognition of the historic location of Ash Green village”.

However I believe the Local Plan (Policy A28) will impact on trees and ancient woodland within the site and does not recognise the historic location of Ash Green village. I have outlined evidence to support my beliefs below.

As the current occupier of Ash Green Station, I feel well based to be able to comment on the rather strange boundaries Guildford Borough Council has created for Ash Green in the 2017 plan. GBC are proposing that the houses of Ash Green Road along with the land south of this up to and including site A28 be included in the Ash and Tongham Urban Area (ATUA), which is historically Ash Green. There will be no boundary between Ash and Ash Green. Ash Green starts on land North of Ash Green Road (part of the proposed A29 development), a fact which seems to have been ignored by placing A28 into the proposed ATUA. I believe the countryside boundary should be placed along Ash Green Road as a minimum but ideally allowing for a buffer into the field south of Ash Manor but north of Ash Green Road, with A28 left as countryside, not shoe-horned in as part of the proposed plans.

The more appropriate, natural defensible boundaries would be either along the old railway line or preferably, along Ash Green Road, which would retain Ash Green village and station in its historic location.
The Ordinance survey map as shown in GBC own Greenbelt and Countryside Study names Ash Green both to the north of the old railway line as well as the south. (see below) As can be seen on this historic O/S map, circa 1920 there were no buildings mapped in Ash Green to the south of Ash Green Lane East, the only properties in Ash Green were those to the north of the railway cutting. Buildings specifically named are Ash Green Station and Ash Green Farm, with the ancient woodland of College Copse running from the railway cutting to Ash Green Lane (east). Ash Green (modern estate) (to the south of Ash Green Lane East) was not the original Ash Green, but had started to appear by mid 20th century, as this map shows circa 1944. The entrance to Dene Lodge through the ancient woodland marked as College Copse has been mapped, showing that the whole of site A28 was originally covered by College Copse. A portion of the remainder in A28 is now classed as ancient woodland, therefore we believe any trees north of the ancient woodland on A28, especially on the western boundary of A28 adjoining White Lane up to the railway cutting be treated with a high degree of sensitivity as they are growing on land which once formed College Copse.

In addition to the above maps in relation to the boundaries of Ash Green village, this image from 1977 shows signage indicating Ash Green is to the north of the railway cutting as well as to the south.

I would also like to bring to attention that the bus stop north of the railway line outside the old station on White Lane is referred to as “Ash Green, Old Station”. I wholly agree with your statement in the local plan (below)

Section 3 Spatial Vision, which states: “Further development is also proposedloacted in and around Ash and Tongham on land beyond the Green Belt along with new gG reen bB elt designated to prevent Ash and Tongham merging with the village of Ash Green.“

I wish to see historic Ash Green comprising Ash Green Road and Ash Green Station included a part of the area of separation. I feel the locally listed building of Ash Green Station under the proposed plans would lose its historic context of actually being in Ash Green. It is a ‘Heritage asset’ as defined by the NPPF; “A building, monument, site, place, area or landscape identified as having a degree of significance meriting considerations in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”. The NPPF also states “Significance derives not only from a heritage asset’s physical presence, but also from its setting”. I believe Guildford Borough Council needs to give more consideration to Ash Green Station and its historical setting.

As stated in Policy D3 below: Historic Environment.

”(1) TWe will conserve and enhance the historic environment will be conserved and enhanced in a manner appropriate to its significance. We will support dDevelopment of the highest design quality that will sustainconserve and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported.

(2) Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question. “ The proposal to remove historic Ash Green from Ash Green goes against the NPPF policy contained within the Local Plan (as shown below), which GBC says it will adhere to.

“ 4.5.43 We will ensure that dNew development must will conserve heritage assets in a manner appropriate to their significance. The NPPF defines significance as “The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.” The contribution of the setting of heritage assets to the appreciation of these qualities will be carefully considered alongside more direct impacts of development proposals.”

The proposed changes would remove Ash Green Station (locally listed) and Ash Green Road out of Ash Green, as well as the historic housing of the Ash Green area. By developing A28 there is also potential to lose the aforementioned ancient woodland within A28 as well as detracting the original setting of The Old Station. A29 also goes against this policy and NPPF guidelines by placing Grade II Listed Ash Manor and associated buildings in the centre of a modern housing estate. Policy D4: Character and design of a new development states that

1) High quality design is expected in the borough. All developments will:

(i)conserves locally and nationally important heritage assets and conserves or enhances their settings
infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29. According to

commences and the wording should reflect this. Also requirement (9) does not address the other significant transport

Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29

surroundings, and therefore should be more specific and say “Sensitive design at site boundaries with the adjacent complex

buildings that originally formed Ash Green village from Ash Green.

buildings of Ash Manor and their

data to the property on the ground floor. Station House suffers from an unusual phenomenon in that sound

reverberates and travels along the old railway cutting. We often hear the noise of trains on the current line in our house,
even though it is some distance away. We have concerns that noise from A28, A29 and A31 will carry along the cutting in
the same way. As can be clearly seen on the map below, sites A28 and A29 to the south of Ash Green Road really don’t
make any sense in terms of preserving historic Ash Green and should be removed from the plan. The buffer zone to

separate Ash from Ash Green should be placed on the land to the north of Ash Green Road up to and around Ash Manor

to compliment and preserve its well documented historic setting.

With the proposed southern extension of A28 it will potentially require the felling of trees and the destruction of the ancient
woodland of College Copse up to the driveway of Dene Lodge. If A28 and the area of A29 south east of Ash Green Road
are removed from the Local Plan it will provide obvious continuity to the natural defensible boundary for the countryside
(the ancient woodland which bounds the eastern edge of A29 should be included in this) thereby preventing the urban
sprawl of Ash and merging of Ash Green into the ATUA. I also object to some of the current and proposed wording in the
plan. I believe Policy P3: Countryside, 4.3.29 should be amended to “Originally consisting of the three small rural villages
of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford
borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic
location for development. However to make this growth sustainable, suitable infrastructure must be implemented before
further development”. This is because I think infrastructure is greatly lacking, especially in relation to roads, traffic and
public transport. I believe 4.3.30 should be amended to “We do however wish to ensure that whilst accommodating this
growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its
intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”. I
think it is vital this sentence be included in the plan as there is a real danger with the current proposed sites of A28 and A29
losing Ash Green’s historical location and identity. I believe Policy P3: Countryside (1) (c ) should be amended to “does
not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”,
in order to protect Ash Green as a separate village. I believe Policy A29: Land to the south and east of Ash and Tongham,
Requirements (6) needs to be amended to protect Ash Green village and the houses within it. As I have pointed out and
evidenced with maps, Ash Green Station and the houses along Ash Green Road formed the village of Ash Green before the
more modern buildings south of the railway cutting appeared, and therefore it is indefensible that GBC want to remove the
buildings that originally formed Ash Green village from Ash Green.

I believe the wording needs to be “Development proposals in the vicinity of Ash Green to have recognition of the historic
location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green
Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White
Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any
development should not be of a size and scale that would detract from the character of the rural landscape. This must
include the provision of a green buffer that maintains separation between any proposed new development and the properties
fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic
development location and provide a transition between the build up area and the countryside beyond”. The wording in
Policy A29, Requirements (8) does not offer enough protection to the Grade II listed buildings of Ash Manor and their
surroundings, and therefore should be more specific and say “Sensitive design at site boundaries with the adjacent complex
of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.” In
Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29
commences and the wording should reflect this. Also requirement (9) does not address the other significant transport
infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29. According to
the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and its public transport infrastructure is very poor. Guildford Borough Council's own Settlement Hierarchy ranks this as the least sustainable location in the borough. Site A28 lies within Ash Green and therefore should be removed from the Local Plan. Local schools, doctors and dentists are already under pressure. I currently struggle to get a doctors appointment within two weeks. I believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back at peak times is extremely congested and would struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments in Hampshire will put a strain on everything before Guildford Borough Council start with any of their proposed developments.

Ash Green, Ash and Tongham has a long recorded history of flooding issues. With the proposed level of development this will do nothing other than exacerbate an already major problem. Our house currently suffers the effects from poor water drainage as the railway cutting is used for local surface water drainage. I have serious concerns that major development around us could lead to further issues regarding flooding.

Where would the proposed entry and egress points be for site A28? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels.

I feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas.

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

“ Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”

“We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”

“does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.”

Attached documents: Henderson Objection to Local Plan (2).pdf (1.6 MB)
Comment ID: pslp172/4320  Respondent: 17467457 / Emily Henderson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

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

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The more appropriate, natural defensible boundaries would be either along the old railway line or preferably, along Ash Green Road, which would retain Ash Green village and station in its historic location.

The Ordinance survey map as shown in GBC own Greenbelt and Countryside Study names Ash Green both to the north of the old railway line as well as the south. (see below)

As can be seen on this historic O/S map, circa 1920 there were no buildings mapped in Ash Green to the south of Ash Green Lane East, the only properties in Ash Green were those to the north of the railway cutting. Buildings specifically named are Ash Green Station and Ash Green Farm, with the ancient woodland of College Copse running from the railway cutting to Ash Green Lane (east). Ash Green (modern estate) (to the south of Ash Green Lane East) was not the original Ash Green, but had started to appear by mid 20th century, as this map shows circa 1944. The entrance to Dene Lodge through the ancient woodland marked as College Copse has been mapped, showing that the whole of site A28 was originally covered by College Copse. A portion of the remainder in A28 is now classed as ancient woodland, therefore we believe any trees north of the ancient woodland on A28, especially on the western boundary of A28 adjoining White Lane up to the railway cutting be treated with a high degree of sensitivity as they are growing on land which once formed College Copse.

In addition to the above maps in relation to the boundaries of Ash Green village, this image from 1977 shows signage indicating Ash Green is to the north of the railway cutting as well as to the south.

I would also like to bring to attention that the bus stop north of the railway line outside the old station on White Lane is referred to as “Ash Green, Old Station”.

Page 43 of 412
I wholly agree with your statement in the local plan (below) Section 3 Spatial Vision, which states:

“Further development is also proposed located in and around Ash and Tongham on land beyond the Green Belt along with new green belt designated to prevent Ash and Tongham merging with the village of Ash Green.”

I wish to see historic Ash Green comprising Ash Green Road and Ash Green Station included as part of the area of separation.

I feel the locally listed building of Ash Green Station under the proposed plans would lose its historic context of actually being in Ash Green. It is a ‘Heritage asset’ as defined by the NPPF; “A building, monument, site, place, area or landscape identified as having a degree of significance meriting considerations in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”. The NPPF also states “Significance derives not only from a heritage asset’s physical presence, but also from its setting”. I believe Guildford Borough Council needs to give more consideration to Ash Green Station and its historical setting.

As stated in Policy D3 below: Historic Environment.

"(1) TWe will conserve and enhance the historic environment will be conserved and enhanced in a manner appropriate to its significance. We will support development of the highest design quality that will sustain conserve and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported.

(2) Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question. “ The proposal to remove historic Ash Green from Ash Green goes against the NPPF policy contained within the Local Plan (as shown below), which GBC says it will adhere to; “ 4.5.43 We will ensure that dNew development must will conserve heritage assets in a manner appropriate to their significance. The NPPF defines significance as “The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.” The contribution of the setting of heritage assets to the appreciation of these qualities will be carefully considered alongside more direct impacts of development proposals.”

The proposed changes would remove Ash Green Station (locally listed) and Ash Green Road out of Ash Green, as well as the historic housing of the Ash Green area. By developing A28 there is also potential to lose the aforementioned ancient woodland within A28 as well as detracting the original setting of The Old Station. A29 also goes against this policy and NPPF guidelines by placing Grade II Listed Ash Manor and associated buildings in the centre of a modern housing estate. Policy D4: Character and design of a new development states that

1) High quality design is expected in the borough. All developments will: (l)conserves locally and nationally important heritage assets and conserves or enhances their settings (m) haves no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight.

By moving Ash Green village boundary (l) would not be complied with. A28 would also have an impact on Dene Lodge (locally listed building) and A29 (south of Ash Green Road) would impact on the setting of Woodberry (also locally listed). Development of A29 around Ash Manor would impact the historic settings of Ashe Grange, Ash Manor, Old Manor Cottage, The Oast House, Stable and The Barn to the south of Ash Manor, all Grade II listed properties. In reference to (m), development of A28 has the potential to block sunlight, reduce privacy and increase noise at our property, due to the unusual fact it is built into a railway cutting and as a result it is below the ground level of A28. Station house ground floor only has windows on the southern side of the house (as the northern side is built into the bank), therefore the horizon for our southern aspect on this floor has a much lower effective horizon and as a result the sun only just reaches our windows in winter months. If development occurs on the northern boundary of A28 it could well result in the complete blocking of natural light to the property on the ground floor. Station House suffers from an unusual phenomenon in that sound reverberates and travels along the old railway cutting. We often hear the noise of trains on the current line in our house, even though it is some distance away. We have concerns that noise from A28, A29 and A31 will carry along the cutting in the same way.
As can be clearly seen on the map below, sites A28 and A29 to the south of Ash Green Road really don’t make any sense in terms of preserving historic Ash Green and should be removed from the plan. The buffer zone to separate Ash from Ash Green should be placed on the land to the north of Ash Green Road up to and around Ash Manor to compliment and preserve its well documented historic setting.

With the proposed southern extension of A28 it will potentially require the felling of trees and the destruction of the ancient woodland of College Copse up to the driveway of Dene Lodge. If A28 and the area of A29 south east of Ash Green Road are removed from the Local Plan it will provide obvious continuity to the natural defensible boundary for the countryside (the ancient woodland which bounds the eastern edge of A29 should be included in this) thereby preventing the urban sprawl of Ash and merging of Ash Green into the ATUA. I also object to some of the current and proposed wording in the plan. I believe Policy P3: Countryside, 4.3.29 should be amended to “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”. This is because I think infrastructure is greatly lacking, especially in relation to roads, traffic and public transport.

I believe 4.3.30 should be amended to “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”.

I think it is vital this sentence be included in the plan as there is a real danger with the current proposed sites of A28 and A29 losing Ash Green’s historical location and identity.

I believe Policy P3: Countryside (1) (c ) should be amended to “does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”, in order to protect Ash Green as a separate village.

I believe Policy A29: Land to the south and east of Ash and Tongham, Requirements (6) needs to be amended to protect Ash Green village and the houses within it. As I have pointed out and evidenced with maps, Ash Green Station and the houses along Ash Green Road formed the village of Ash Green before the more modern buildings south of the railway cutting appeared, and therefore it is indefensible that GBC want to remove the buildings that originally formed Ash Green village from Ash Green.

I believe the wording needs to be “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”. The wording in Policy A29, Requirements (8) does not offer enough protection to the Grade II listed buildings of Ash Manor and their surroundings, and therefore should be more specific and say “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor.

Approaches and views to, from and around this heritage asset must be protected.” In Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29 commences and the wording should reflect this. Also requirement (9) does not address the other significant transport infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29. According to the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and its public transport infrastructure is very poor. Guildford Borough Council’s own Settlement Hierarchy ranks this as the least sustainable location in the borough. Site A28 lies within Ash Green and therefore should be removed from the Local Plan.

Local schools, doctors and dentists are already under pressure. I currently struggle to get a doctors appointment within two weeks.
I believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back at peak times is extremely congested and would struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments in Hampshire will put a strain on everything before Guildford Borough Council start with any of their proposed developments. Ash Green, Ash and Tongham has a long recorded history of flooding issues. With the proposed level of development this will do nothing other than exacerbate an already major problem. Our house currently suffers the effects from poor water drainage as the railway cutting is used for local surface water drainage. I have serious concerns that major development around us could lead to further issues regarding flooding.

Where would the proposed entry and egress points be for site A28? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels.

I feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas.

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

“Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”

“We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”

“does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.”

Attached documents: Henderson Objection to Local Plan (2).pdf (1.6 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I believe Policy A29: Land to the south and east of Ash and Tongham, Requirements (6) needs to be amended to protect Ash Green village and the houses within it. As I have pointed out and evidenced with maps, Ash Green Station and the houses along Ash Green Road formed the village of Ash Green before the more modern buildings south of the railway cutting appeared, and therefore it is indefensible that GBC want to remove the buildings that originally formed Ash Green village from Ash Green.

I believe the wording needs to be “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village.

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In Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29 commences and the wording should reflect this. Also requirement (9) does not address the other significant transport infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29.

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

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village.

Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.”

Attached documents:

Comment ID: pslp171/2702  Respondent: 17467457 / Emily Henderson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I believe Policy P3: Countryside, 4.3.29 should be amended to “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”. This is because I think infrastructure is greatly lacking, especially in relation to roads, traffic and public transport.

I believe 4.3.30 should be amended to “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”. I think it is vital this sentence be included in the plan as there is a real danger with the current proposed sites of A28 and A29 losing Ash Green’s historical location and identity. I believe Policy P3: Countryside (1) (c ) should be amended to “does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”, in order to protect Ash Green as a separate village.

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

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

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

“We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”

“does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”

Attached documents:

Comment ID: pslp171/2711 Respondent: 17469729 / Philip Cefai Agent:

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

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

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

I object to the 2017 New Local Plan.

The utilisation of “Green Belt Land” in order to meet housing requirements is damaging to the area and population.

The suggestion by Labour Peer Lord Adonis to double the size of the population in Guildford to 224,000 these are figures pulled out of the air with no substance.

The plans put forward by Guildford Council of over 13,000 new homes for the area is unsustainable.
Providing a housing overflow in our Green Belt Land for Woking is an awful idea. Congestion in the area is already severe. Plans proposed by Guildford Council will make travel in the area even worse during the plan period and beyond.

Providing 60% accommodation to Guildford University students will only impact on properties in Guildford town. This needs to be increased in order to free up affordable housing in the area.

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

Attached documents:

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Site ID | Site Name | Water Response | Waste Response
---|---|---|---
5351 | Guildford Plaza (former Burymeade House) | The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered | On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

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

Attached documents:
Site ID: 42296  Site Name: A11 - Guildford Park Car Park, Guildford Park Road, Guildford

Water Response: The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development.

Waste Response: The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

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

Attached documents:

Comment ID: pslp172/4801  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A12

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

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

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<tbody>
<tr>
<td>42296</td>
<td>A11 - Guildford Park Car Park, Guildford Park Road, Guildford</td>
<td>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development.</td>
<td>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</td>
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</tbody>
</table>
679 A12 - Bright Hill Car Park, Sydenham Road, Guildford

On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

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

Attached documents:

**Comment ID:** pslp172/4802  **Respondent:** 17484449 / Thames Water Utilities Ltd (Sir or Madam)  **Agent:** Savills (Richard Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A13

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

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

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<tr>
<td>51752</td>
<td>A13 - Kernal Court, Walnut Tree Close, Guildford</td>
<td>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4803  **Respondent:** 17484449 / Thames Water Utilities Ltd (Sir or Madam)  **Agent:** Savills (Richard Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A14
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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<tr>
<td>42317</td>
<td>A14 - Wey Corner, Walnut Tree Close, Guildford</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4805  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A15

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

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

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<tr>
<td>42310</td>
<td>A15 - Land At Guildford Cathedral, Alresford Road, Guildford</td>
<td>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Site ID | Site Name | Water Response | Waste Response
---|---|---|---
51753 A16 | Land Between Gill Avenue and Rosalind Franklin Close, Guildford | The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. | The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

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

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<tbody>
<tr>
<td>51754</td>
<td>Land at Guildford College Campus, Stoke Road, Guildford, GU1 1EZ</td>
<td>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4809  **Respondent:** 17484449 / Thames Water Utilities Ltd (Sir or Madam)  **Agent:** Savills (Richard Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A19

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

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

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<tbody>
<tr>
<td>42315</td>
<td>A19 - Land At Westway, Off Aldershot Road, Guildford</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4812  **Respondent:** 17484449 / Thames Water Utilities Ltd (Sir or Madam)  **Agent:** Savills (Richard Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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<tr>
<td>48431</td>
<td>A2 - Guildford Cinema, Bedford Road, Guildford</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4816  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A20

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

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<tr>
<td>42345</td>
<td>A20 - Former Pond Meadow School, Guildford</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4818  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<tbody>
<tr>
<td>42327</td>
<td>A22 - Land north of Keens Lane, Guildford</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</td>
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Comment ID: pslp172/4798  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

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

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

Policy A24: Slyfield Area Regeneration Project, Guildford

The SARP site includes Thames Water’s Guildford (Slyfield) Sewage Treatment Works (STW) site and the draft Local Plan proposes the relocation of the STW as part of the SARP.

To ensure sufficient wastewater treatment for the Guildford drainage area, and suitable drainage network provision for the SARP area, the development of the SARP will require the relocation of the Sewage Treatment Works.

This would be in the form of a new sewage treatment works and necessary supporting local drainage network infrastructure.

Thames Water is working with the Council regarding the redevelopment of the SARP site and the feasibility of relocating the STW to the land identified in the draft Local Plan.
Thames Water confirms its support in principle for the relocation of the STW. Detailed technical and feasibility assessments are being produced with the Council to support the next stages of design for the STW relocation.

2374 A24 - Slyfield Area Regeneration Project (SARP)

The water treatment capacity in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example, Water Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.

Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example, Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.

The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered.

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

Attached documents:

Comment ID: pslp172/4819  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan the water treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan the sewage treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered.

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

Attached documents:

Comment ID:-pslp172/4821  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam) Agent: Savills (Richard Hill)

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

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

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

Attached documents:

Comment ID: pslp172/4823  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A27

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

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

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>42339</td>
<td>A27 - Warren Farm, White Lane, Ash, Guildford, GU12 6HW</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Site ID | Site Name | Water Response | Waste Response
--- | --- | --- | ---
42338 | A28 - Land to the East of White Lane, Ash Green | This site falls outside of Thames Water’s water supply boundary. | The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

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

Attached documents:
42320 A29 - Land To The South and East Of Ash and Tongham
This site falls outside of Thames Water’s water supply boundary.

The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

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

Attached documents:

Comment ID: pslp172/4838  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A3

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

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

42306 A3 - Land between Farnham Road and the Mount
We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan: “Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure.”

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
Site ID | Site Name | Water Response | Waste Response
--- | --- | --- | ---
42342 | A32 - Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford | The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. | The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

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

Attached documents:
Site ID | Site Name | Water Response | Waste Response
--- | --- | --- | ---
38014 | A35 - Land at the former Wisley airfield | This site falls outside of Thames Water’s water supply boundary. | Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered.

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

Attached documents:

Comment ID: pslp172/4873  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)
<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>42323</td>
<td>Site 4 Thatcher's Hotel</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
</tbody>
</table>

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

Attached documents:

Comment ID: pslp172/4844  
Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  
Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A37

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

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

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>49148</td>
<td>A37 - Land R/O Bell &amp; Colvill (horsley) Ltd, Epsom Road, West Horsley, Leatherhead, KT24 6DG</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
</tbody>
</table>

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

Attached documents:

Comment ID: pslp172/4846  
Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  
Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

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<th>Site ID</th>
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</tr>
</thead>
<tbody>
<tr>
<td>41540</td>
<td>A38 - Land to the west of West Horsley</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</td>
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<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>42332</td>
<td>A39 - Land near Horsley Railway Station, Ockham Road North</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4848  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

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

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

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

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<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>51756</td>
<td>A42 - Clockbarn Nursery, Tannery Lane, Send</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
</tbody>
</table>

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

Attached documents:

Comment ID: pslp172/4849  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

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

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

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

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<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
This site falls outside of Thames Water’s water supply boundary.

The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered.

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

Attached documents:

Comment ID: pslp172/4851  
Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  
Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

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

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

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<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
</table>
| 51759  | A44 - Land West of Winds Ridge and Send Hill, Send | This site falls outside of Thames Water’s water supply boundary. | On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

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

Attached documents:

Comment ID: pslp172/4852  
Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  
Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A45
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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<tr>
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<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>50714</td>
<td>A45 - Land R/O The Talbot, High Street, Ripley</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
</tbody>
</table>

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

Attached documents:

Comment ID: pslp172/4854  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam) Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A5

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

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

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<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>42298</td>
<td>A5 - Jewsons, Walnut Tree Close, Guildford</td>
<td>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.</td>
<td>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liase with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</td>
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<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>42294</td>
<td>A6 - North Street Redevelopment, Guildford</td>
<td>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build</td>
<td>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4855  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>48437 A7 - Land and Buildings at Guildford Railway Station, Guildford</td>
<td>The water treatment capacity in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades may be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.</td>
<td>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</td>
<td></td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4861   Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)   Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A9

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

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

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>47667 A9 - 77-83 Walnut Tree Close,</td>
<td>On the information available to date we do not envisage infrastructure concerns</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding</td>
<td></td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/1052  Respondent:  17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent:  Savills (Richard Hill)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

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

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

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.

As you will be aware, Thames Water are the statutory sewerage undertaker for the whole of the Guildford Borough and the statutory water undertaker for the southern part of the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We commented on the previous version of the submission Local Plan in July 2016, therefore the following comments relate to the amended policies only as requested:

Policy ID1: Infrastructure and delivery

Thames Water still support the amended Policy I1 (now Policy ID1) and supporting text in principle as it is largely in line with previous representations, but consider that the additional text on water/wastewater infrastructure should still be included.

Thames Water support the Policy in principle as a key sustainability objective for the preparation of the new Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. The National Planning Policy Framework (NPPF) includes specific guidance on water and sewerage infrastructure. Paragraph 156 of the NPPF states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:……the provision of infrastructure for water supply and wastewater….”

Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment…..take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water support the identification of water supply and waste water treatment infrastructure at paragraph 4.6.3, but given the importance of such infrastructure to sustainable development, it is considered that text along the following lines
should be also included to support Policy ID1: “The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.

The development or expansion of water supply or waste water treatment facilities will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”

Site Allocations

Specific Water Supply and Sewerage/Wastewater Infrastructure Comments:

Water treatment and wastewater/sewage treatment capacity maybe a constraint in some catchments within the Guildford Borough area. As the Local Plan is finalised we will be reviewing which of our treatment sites need upgrades to accommodate the growth and we are willing to have a meeting with the Council to discuss this.

The attached updated table provides Thames Water’s site specific comments from desktop assessments on water supply and sewerage/wastewater infrastructure in relation to the proposed housing sites, but more detailed modelling may be required to refine the requirements.

These sites have been assessed on an individual base with only limited opportunity to consider cumulative impacts. Therefore, the impact of multiple sites in the same area coming forward may have a greater impact. The scale, location and time to deliver any required network upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing.

Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development in line with the Core Strategy Policy IN2: Water Supply and Wastewater.

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

[See other comments for site specific comments]

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

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

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

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>1.</td>
<td>I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.</td>
</tr>
<tr>
<td>2.</td>
<td>There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
</tr>
<tr>
<td>3.</td>
<td>Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.</td>
</tr>
<tr>
<td>4.</td>
<td>The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.</td>
</tr>
<tr>
<td>5.</td>
<td>The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.</td>
</tr>
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<td>I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Comment ID: pslp172/4363</th>
<th>Respondent: 17490177 / Fabia Dyer</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.

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

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

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

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

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

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Comment ID: pslp172/4364  Respondent: 17490177 / Fabia Dyer  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/522  Respondent: 17490177 / Fabia Dyer  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4371  Respondent: 17490209 / Elizabeth Ball  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4372  Respondent: 17490209 / Elizabeth Ball  Agent: 

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
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8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

Attached documents:

Comment ID: pslp172/4373  
Respondent: 17490209 / Elizabeth Ball  
Agent: 

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to...
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

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10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

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Comment ID: pslp17q/525   Respondent: 17490209 / Elizabeth Ball   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

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Comment ID: pslp172/4368   Respondent: 17490241 / David Harland   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4369  Respondent: 17490241 / David Harland  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

**Comment ID:** pslp172/4370  **Respondent:** 17490241 / David Harland  **Agent:**

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357 sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/2799  Respondent: 17490241 / David Harland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/524  Respondent: 17490241 / David Harland  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate  

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4377  Respondent: 17490369 / Miriam Edelsten  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25  

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much. 
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. 
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt, 
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity 
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford. 
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon. 
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). 
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. 
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID:  pslp172/4378  Respondent: 17490369 / Miriam Edelsten  Agent: 

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches 
2. It ignores all the thousands of previous objections made by local people 
3. There is no proven demand for travelling show people plots in this location 
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. 
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required. 
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick's Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick's Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4379  Respondent: 17490369 / Miriam Edelsten  Agent: 

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357 sq m in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607 sq m of B use class floorspace to come forward. This figure comprises a net loss of 4,750 sq m of B1a use class floorspace and a net gain of 38,357 sq m in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357 sq m.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/2805  Respondent: 17490369 / Miriam Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/526  Respondent: 17490369 / Miriam Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4395  Respondent: 17490561 / Derek Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.

2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

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

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

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

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

Attached documents:

Comment ID: pslp172/4396  Respondent: 17490561 / Derek Gillmore  Agent: 

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

2. It ignores all the thousands of previous objections made by local people

3. There is no proven demand for travelling show people plots in this location

4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/532  Respondent: 17490561 / Derek Gillmore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4398  Respondent: 17490593 / Emily Edwards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

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

Attached documents:

Comment ID: pslp172/4399  Respondent: 17490593 / Emily Edwards  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. 
21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. 
22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. 
23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse. 
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health. 
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2). 
26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1) 

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

Attached documents:

Comment ID: pslp172/4400  Respondent: 17490593 / Emily Edwards  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site 
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously. 
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/2826  Respondent: 17490593 / Emily Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/533  Respondent: 17490593 / Emily Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4416  Respondent: 17490753 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4418  Respondent: 17490753 / David Marshall  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4419  Respondent: 17490753 / David Marshall  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/2845  Respondent: 17490753 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

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<th>Comment ID: pslp172/4420</th>
<th>Respondent: 17490785 / Mary Ball</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
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8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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Attached documents:

Comment ID: pslp172/4423  Respondent: 17490785 / Mary Ball  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
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5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
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9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

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

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

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4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

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Comment ID: pslp17q/541  Respondent: 17490785 / Mary Ball  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

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Comment ID: pslp172/4436  Respondent: 17490881 / David Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4437  Respondent: 17490881 / David Smylie  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the development at Garlick’s Arch because of the loss of rural employment. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4438  Respondent: 17490881 / David Smylie  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

**Comment ID:** pslp171/2863  **Respondent:** 17490881 / David Smylie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/545  Respondent: 17490881 / David Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4479  Respondent: 17491297 / Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4480  Respondent: 17491297 / Sonja Freebody  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4481  Respondent: 17491297 / Sonja Freebody  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

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**Comment ID:** pslp17q/561  **Respondent:** 17491297 / Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

**Attached documents:**

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**Comment ID:** pslp172/4484  **Respondent:** 17491329 / Maura Dearden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

2. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

3. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

4. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

5. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

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

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

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

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

Attached documents:

Comment ID: pslp172/4485  Respondent: 17491329 / Maura Dearden  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

2. It ignores all the thousands of previous objections made by local people

3. There is no proven demand for travelling show people plots in this location

4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

13. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4486  Respondent: 17491329 / Maura Dearden  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/2915  Respondent: 17491329 / Maura Dearden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

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Comment ID: pslp17q/562  Respondent: 17491329 / Maura Dearden  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:
C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of the Green Belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4498  Respondent: 17491425 / Moira Maidment  Agent:

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

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

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

C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches.
2. It ignores all the thousands of previous objections made by local people.
3. There is no proven demand for travelling show people plots in this location.
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

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

8. Garlick's Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

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

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:
C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

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

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

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

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/569  Respondent: 17491425 / Moira Maidment  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

G. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4494  Respondent: 17491489 / Margaret Perkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4495  Respondent: 17491489 / Margaret Perkins  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.

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

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

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

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

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
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6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
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10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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Attached documents:

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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
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3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
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7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

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14. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

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Comment ID: pslp172/4532  Respondent: 17491745 / Colin Marshall  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

| Comment ID: | pslp17q/578 | Respondent: | 17491745 / Colin Marshall | Agent: |
|-------------|-------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate |

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

**Attached documents:**

| Comment ID: | pslp172/4533 | Respondent: | 17492801 / Stephen Fort | Agent: |
|-------------|-------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A25 |

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4534  Respondent: 17492801 / Stephen Fort  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.
17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

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14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/2967  Respondent: 17492801 / Stephen Fort  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4541  Respondent: 17492833 / Helen Marshall  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/581  Respondent: 17492833 / Helen Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4548  Respondent: 17492897 / James Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4549  Respondent: 17492897 / James Robinson  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4550  Respondent: 17492897 / James Robinson  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/583  Respondent: 17492897 / James Robinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4555  Respondent: 17492993 / Jenny Rampe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4558  Respondent: 17492993 / Jenny Rampe  Agent: 

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

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Comment ID: pslp172/4561  Respondent: 17492993 / Jenny Rampe  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/587  Respondent: 17492993 / Jenny Rampe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4569  Respondent: 17493505 / Nigel Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with the A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4570  Respondent: 17493505 / Nigel Simpson  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4571  Respondent: 17493505 / Nigel Simpson  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

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10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

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

Attached documents:

Comment ID: pslp171/3004  Respondent: 17493505 / Nigel Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

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

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The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

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

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

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

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

Attached documents:

**Comment ID:** pslp172/4575  **Respondent:** 17493569 / Kim Poysner-Jones  **Agent:**

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

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

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

C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4576  Respondent: 17493569 / Kim Poysner-Jones  Agent:

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

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

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

C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

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

Attached documents:

Comment ID: pslp171/3013  Respondent: 17493569 / Kim Poysner-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
E. Policy S1 Presumption in favour of Sustainable Development – My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID:  pslp17q/593  Respondent:  17493569 / Kim Poysner-Jones  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

G. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID:  pslp171/3054  Respondent:  17494145 / Penny Eagle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

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

Comment ID: pslp17q/603  Respondent: 17494145 / Penny Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

Attached documents:

Comment ID: pslp172/4623  Respondent: 17494273 / Rosie Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
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3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
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8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

Attached documents:

Comment ID: pslp172/4625  Respondent: 17494273 / Rosie Wood  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
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12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

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**Comment ID:** pslp17q/605  **Respondent:** 17494273 / Rosie Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

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**Comment ID:** pslp172/4639  **Respondent:** 17494689 / Clare Chambers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

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

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

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

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

Attached documents:

Comment ID: pslp172/4640  Respondent: 17494689 / Clare Chambers  Agent: 

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but
to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

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

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

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4642  Respondent: 17494689 / Clare Chambers  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:
**Comment ID:** pslp17q/610  **Respondent:** 17494689 / Clare Chambers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

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**Comment ID:** pslp172/4646  **Respondent:** 17494945 / Diana Mulholland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is
stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of
cars through the narrow, winding road through West Clandon.

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

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

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

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

Attached documents:

Comment ID: pslp172/4648  Respondent: 17494945 / Diana Mulholland  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and
ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes
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requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt
Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at
every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of
the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by
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8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy
walking distance and bus services across rural villages are forever reducing. Residents will have few options, but
to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore,
there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be
dependent on the car for transport. Greater consideration should be given to increasing the density of
development in urban areas, such as Guildford, where more practical sustainable transport options can be
provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion.
Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the
environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to
be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt
is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the
neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

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

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

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

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

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4649</th>
<th>Respondent: 17494945 / Diana Mulholland</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

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13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/3084  Respondent: 17494945 / Diana Mulholland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl! Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/611  Respondent: 17494945 / Diana Mulholland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: pslp172/4650  Respondent: 17495041 / Paul Mulholland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
4. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
5. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
6. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
7. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
8. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
9. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
10. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding...
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

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

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

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

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

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

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

24. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4652  Respondent: 17495041 / Paul Mulholland  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previous.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

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Comment ID: pslp171/3090  Respondent: 17495041 / Paul Mulholland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

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Comment ID: pslp17q/613  Respondent: 17495041 / Paul Mulholland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID:  pslp172/4653  Respondent:  17495105 / Simon Chambers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Comment ID: pslp172/4654  Respondent: 17495105 / Simon Chambers  Agent:

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

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

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

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4655   Respondent: 17495105 / Simon Chambers   Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

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Comment ID: pslp171/3094  Respondent: 17495105 / Simon Chambers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

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Comment ID: pslp17q/615  Respondent: 17495105 / Simon Chambers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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Attached documents:

<table>
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<th>Respondent:</th>
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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
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8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
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3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

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

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

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4670  Respondent: 17495393 / Samantha Gilchrist  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

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Comment ID: pslp171/3111  Respondent: 17495393 / Samantha Gilchrist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

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Attached documents:

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Comment ID: pslp17q/620  Respondent: 17495393 / Samantha Gilchrist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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Attached documents:

Comment ID: pslp172/4683  Respondent: 17495521 / Elizabeth Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

Attached documents:

Comment ID: pslp172/4685  Respondent: 17495521 / Elizabeth Palmer  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
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7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/3126  Respondent: 17495521 / Elizabeth Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/626  Respondent: 17495521 / Elizabeth Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

**Attached documents:**

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**Comment ID:** pslp172/4737  **Respondent:** 17496129 / Neil Rampe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

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

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

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

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

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

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

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

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

Attached documents:

Comment ID: pslp172/4739  Respondent: 17496129 / Neil Rampe  Agent:

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

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

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Comment ID: pslp172/4746  Respondent: 17496161 / Ray Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

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

C.i. Policy 25 Gosden Hill – My Objections

I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

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

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4747  Respondent: 17496161 / Ray Mackay  Agent: 

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

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

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

C.ii. Policy A43 Garlick’s Arch – My Objections
I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

It ignores all the thousands of previous objections made by local people

There is no proven demand for travelling show people plots in this location

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

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

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport.

Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

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

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is
a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

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

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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

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

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

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

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

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

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

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

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

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

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

**Comment ID:** pslp172/4748  **Respondent:** 17496161 / Ray Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.iii. Policy A58 Burnt Common – My Objections
I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.“

There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The impact on small surrounding roads will create traffic gridlock.

It will join up existing villages and defeat the purpose of the Green Belt.

The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3198  Respondent: 17496161 / Ray Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/647  Respondent: 17496161 / Ray Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

G. Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4777  Respondent: 17497313 / Cheryl Barnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/4778</th>
<th>Respondent: 17497345 / J.E. Pullen</th>
<th>Agent:</th>
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</table>

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4780  Respondent: 17497345 / J.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 17497345 / J.E. Pullen</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<table>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4795  Respondent: 17497377 / Stephen Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"  

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond."

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"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp171/3205  Respondent: 17497377 / Stephen Holmes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
• 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
• 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
• Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

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Comment ID: pslp172/4782  Respondent: 17497409 / M Flach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4783  Respondent: 17497441 / Rosemary & Paul Fenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4791  Respondent: 17497601 / I Rose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4792  Respondent: 17497633 / Michael Fields  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area. Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

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"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:
Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4808  Respondent: 17497793 / Mike & Fiona Sandford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4811  Respondent: 17497825 / S Powell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4822  Respondent: 17497857 / David Voller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4824  Respondent: 17497889 / Michael Ford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4827  Respondent: 17497921 / Adrian Leggett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4829  Respondent: 17497953 / Jillian Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/4834  Respondent: 17497985 / Carol Hawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/4836  Respondent: 17498017 / John. C Akass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: pslp172/4842  Respondent: 17498081 / Kenneth Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4850  Respondent: 17498113 / Marie Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4853  Respondent: 17498145 / Anne Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4856  Respondent: 17498177 / Philip Midwintor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID:  pslp172/4859  Respondent:  17498241 / Anne Dealon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID:  pslp172/4863  Respondent:  17498273 / Joe Vickers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<th>pslp172/4865</th>
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Attached documents:

Comment ID: pslp172/4872  Respondent: 17498369 / Francis Henry Quinlan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4875  Respondent: 17498433 / Valerie & George Chant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4877  Respondent: 17498497 / Edward John Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4879  Respondent: 17498561 / Dominic Lawson  Agent:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4880  Respondent: 17498593 / Patricia Perrin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: pslp172/4882  Respondent: 17498657 / John and Pam Jopson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4883  Respondent: 17498689 / Gemma Balaam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4885  Respondent: 17498721 / Anthony Weeks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4886  Respondent: 17498753 / Roy Corey & Gladis Crey  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4887  Respondent: 17498817 / Elsing Vatens  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4890  Respondent: 17498849 / Frank Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4891  Respondent: 17498881 / Colin Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4895  Respondent: 17498913 / David Harvey Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4892  Respondent: 17498945 / Michael Hutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4893  Respondent: 17498977 / Peter Sutcliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4894  Respondent: 17499009 / Brian Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4897  Respondent: 17499041 / John Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4898  Respondent: 17499073 / Kate Moseley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: pslp172/4899  Respondent: 17499105 / Wendy Foster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4900  Respondent: 17499169 / Jack Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4901   Respondent: 17499233 / Robin Rose   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4903   Respondent: 17499265 / Margaret Davies   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4902   Respondent: 17499297 / Emily Clarke   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4911   Respondent: 17499329 / alex Hales   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4916  Respondent: 17499361 / Kathleen Coleman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4919  Respondent: 17499393 / Yvonne Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<th>Respondent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4923  Respondent: 17499553 / Sybil Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? (  )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: pslp172/4922  Respondent: 17499585 / Michelle Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? (  )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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Attached documents:

Comment ID: pslp172/4925  Respondent: 17499617 / Robert Haigh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4926  Respondent: 17499649 / A Tomkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: pslp172/4927  Respondent: 17499681 / Marion May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4928  Respondent: 17499713 / neil Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<th>Comment ID: pslp172/4930</th>
<th>Respondent: 17499745 / Norah Davis</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Attached documents:

Comment ID: pslp172/4934  Respondent: 17499809 / E Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4935  Respondent: 17499841 / Peter Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4936  Respondent: 17499905 / Sarah Jane Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4937  Respondent: 17499937 / Alan Pain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4944  Respondent: 17500065 / J Bradbeer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4945  Respondent: 17500097 / Christopher Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID:  pslp172/4946  Respondent:  17500129 /  E Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
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Attached documents:

Comment ID:  pslp172/4949  Respondent:  17500193 /  Penelope Floyd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4950  Respondent: 17500321 / C. Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4951  Respondent: 17500353 / Eleanor De Forest-Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4953  Respondent: 17500417 / david john evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4955  Respondent: 17500449 / Andrew Powell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID:  pslp172/4957  Respondent:  17500545 / S Hayley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID:  pslp172/4960  Respondent:  17500577 / basil minor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

**Comment ID:** pslp172/4962  **Respondent:** 17500609 / Nigel Batters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

**Comment ID:** pslp172/4964  **Respondent:** 17500641 / Ali Pereia  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4965  Respondent: 17500673 / Layla Alhasani  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4966  Respondent: 17500705 / M. Corpes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4967  Respondent: 17500769 / Alan Beasty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4968  Respondent: 17500801 / Maha Al-Hasani  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4992  Respondent: 17500833 / Christine & Philip Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Correct title of Policy A28 to say Ash Green, and not Ash.

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Attached documents:

Comment ID: pslp172/4984  Respondent: 17500833 / Christine & Philip Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

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"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

**Policy P3 - Countryside**

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4975  Respondent: 17501025 / Laura Wilkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4976  Respondent: 17501057 / Charlotte Birus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/5250  Respondent: 17501089 / J W Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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Attached documents:

Comment ID: pslp172/4977  Respondent: 17501121 / William Burgess  Agent:

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Attached documents:

Comment ID: pslp172/4996  Respondent: 17501185 / Tracy White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision
of a green buffer that maintains separation between the any proposed new development and the properties fronting onto
Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location
and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval
hall house and should be amended as follows:
"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this
heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp171/3219  Respondent: 17501185 / Tracy White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: pslp172/4978  Respondent: 17501217 / Sarah Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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Attached documents:

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Comment ID: pslp172/4990  Respondent: 17501729 / Daniel John Hutchines  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: pslp172/4993  Respondent: 17501761 / James Millard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/4998  **Respondent:** 17502017 / Arnold Peachey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/4999  **Respondent:** 17502049 / Leslie Swain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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285 of 412
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: pslp172/5004  Respondent: 17502305 / Allen Davey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: pslp172/5006  Respondent: 17502433 / Ryan Eykenky  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5007    Respondent: 17502497 / Steve Platt    Agent:    

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5009    Respondent: 17503041 / Ronald Kitchen    Agent:    

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5012  Respondent: 17503137 / Susan Saxby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5013  Respondent: 17503169 / Keith Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5014  Respondent: 17503265 / Luissa Lisowski  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5016  Respondent: 17503297 / Pauline Stonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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</table>
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area. Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31 /White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

**Attached documents:**

| Comment ID: | pslp171/3224 | Respondent: | 17505345 / S.E. Marston | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5028  Respondent: 17505537 / Debbie Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5030  Respondent: 17506337 / Gillian Hendon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5032  Respondent: 17506401 / Kathleen Morris Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5033  Respondent: 17506465 / Brigita Varadi Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5035  Respondent: 17506529 / Margaret Arnold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5039  Respondent: 17506625 / Lesley Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5041  Respondent: 17506689 / Keith Dewey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5043  Respondent: 17506785 / Hazel Cleasson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5044  Respondent: 17506817 / Maria Wale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5045  Respondent: 17506849 / Helen Marlow Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5047  Respondent: 17506945 / Julian Chase  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5048  Respondent: 17506977 / Gennyfer Pearson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5049  Respondent: 17507073 / Philip Haigh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5050  Respondent: 17507137 / Wendy Wythe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5051  Respondent: 17507201 / Michael Pitson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5052  Respondent: 17507233 / Veronica Bowen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5056  Respondent: 17507425 / Laurence Greig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: pslp172/5057  Respondent: 17507521 / Derek & Nicola Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5058  Respondent: 17507617 / Glyn Sherman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5060  Respondent: 17507681 / R.G. Evang  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/5069</th>
<th>Respondent:</th>
<th>17507713 / T. A Trusler</th>
<th>Agent:</th>
</tr>
</thead>
</table>

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding...
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5071  Respondent: 17507713 / T. A Trusler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5063  Respondent: 17507745 / Robert Whitney  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5065  Respondent: 17507809 / Joanne Woodgate  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5066  Respondent: 17507841 / Chloe Greene  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5075  Respondent: 17508289 / M. Bray-Brook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5076  Respondent: 17508353 / Linda Dixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5078  Respondent: 17508417 / Edward Beddoe-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/5080  **Respondent:** 17508481 / Keith Watson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/5081  **Respondent:** 17508513 / Jeanane Stock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/5082  Respondent: 17508577 / Shirley & Terence Pickford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5083  Respondent: 17508609 / Iris Hucklesby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5084  Respondent: 17508641 / James Haigh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5085  Respondent: 17508673 / Fiona Beasty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5086  Respondent: 17508737 / Andrew Wale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5087  Respondent: 17508833 / Caroline Burnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/5088  Respondent: 17508929 / Thomas Parsons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5089  Respondent: 17508961 / Margaret Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5090  Respondent: 17508993 / C Porteous  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5091  Respondent: 17509057 / Duncan Foster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5092  Respondent: 17509153 / Michael Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/5093  Respondent: 17509185 / Justine Charman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5094  Respondent: 17509249 / Roward Jorris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5097  Respondent: 17509313 / Christine Haigh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/5098  Respondent: 17509409 / L McGregor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5099  Respondent: 17509441 / Leslie Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1010  Respondent: 17524097 / Robert Howard  Agent: Lambert Smith Hampton (Helen Marks)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Representations to Guildford Borough Proposed Submission Local Plan: strategy and sites (2017)
Land at Foxburrow Hill Road, Guildford

We are writing on behalf of our client Mr Robert Howard in response to the above consultation document.

Our client has land interests in the southern part of the Borough, immediately adjacent to the boundary with Waverley Borough Council and close to the settlement of Bramley. We have previously responded to the Council’s consultation on its SHLAA and Draft Local Plan (2014) on our client’s behalf with details of this land interest which we consider to have medium to long term potential as a housing site. In particular, we consider that the site has the potential to deliver a variety of housing types to meet the needs of the ageing population and the family housing market, for which there is significant projected growth identified.

With regards to the latest Proposed Submission Document, we acknowledge that comments should only refer to the changes from last year’s consultation. These changes include:

- the total housing target being reduced by 1,400 units for the period up to 2034 – a total of 12,426 homes compared to 13,860 last year;
- a reduced housing need from 693 to 654 units per year;
- some key housing sites being removed from the plan;
- a reduction in the number of homes allocated on Green Belt land during the plan period by 1,850; and
- updated sites with increased numbers of homes on brownfield land.

From our review of the Proposed Submission Document our key concerns are the reduction in the overall housing numbers, the increased focus of housing on brownfield sites and the removal of identified safeguarded land from the Green Belt. We address each of these points in turn below.

Reduced Housing Numbers
As we set out in our previous representations to the Draft Local Plan Document in 2014, we consider there is a clear need to respond to the growing housing demand in the Borough. As such, we are concerned that the reduction of the overall housing target could result in unmet need over the plan period. Furthermore, the decision to reduce the number of homes delivered on Green Belt land and increase housing numbers on brownfield sites will result in the Council delivering a significant proportion of high density residential schemes and a limited future supply of family housing for which there is already an acute shortage.

From our review of the proposed housing sites listed in the consultation document we consider there is an over-reliance on brownfield sites, which are more likely to deliver high density residential development and little in the way of family and affordable housing. Moreover, we are concerned that the economic base of Guildford town centre is becoming increasingly dominated by residential uses, making the local economy less varied, less robust, and more vulnerable. In this respect, the Local Plan needs to balance the need for housing with the need for employment and retail space, and we doubt that such a balance can be achieved with the current strategy.

In addition to the above, it is also evident that additional sites which are not subject to the same financial viability issues (which affect so many urban sites) would provide more certainty in terms of availability and deliverability, especially in relation to securing a range of dwelling types and sizes that meet the diverse housing needs of the Borough. It is our firm belief that taking an inflexible protectionist approach towards Green Belt release will undermine the need to deliver sufficient development to meet the growth requirements of the Borough.

With regards to dwelling mix, we note that the Council’s SHMA 2015 and Addendum Report 2017 shows that there is a need for 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes. The Borough also has an ageing population with a significant projected growth in the over 65 year olds and an estimated need for 1,061 specialist homes accommodation for older people over the plan period. As such, there is a clear danger that the above mix will not be met if the Council seek to increase the number of units on previously developed sites in urban areas which will primarily deliver high density one and two bedroom flats.

Whilst we do not object to the redevelopment of each and every residential site within the urban area, it is nevertheless the case that a strategy of seeking to maximise urban opportunities purely to avoid the release of sites within the Green Belt has a negative impact on the diversity and balance of land uses within the town centre, to the detriment of both the quality of life of residents and the inherent sustainability of that urban area, which is derived in no small part from the availability of a range of local facilities, and the availability of a range of housing types.

Safeguarded Land

We note that the areas of safeguarded land previously identified in the Draft Plan (2014) have been removed from the Proposed Submission Document without any justification. We strongly object to the deletion of safeguarded land and believe it is vital that the Borough identify suitable safeguarded sites within the Local Plan.

As noted in the NPPF (paragraph 85), LPAs should, where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period. In the case of Guildford Borough Council, we strongly believe this is necessary particularly given the severe housing shortage and the proportion of green Belt land within the Borough (89%).

Whilst we acknowledge the loss of Green Belt land is politically unpopular, what is needed in the forthcoming Local Plan is the foresight to identify an appropriate range of safeguarded sites which will cater for the diverse and growing needs of the Borough’s population and provide a degree of certainty going forward. In this respect, safeguarded land will reduce the need to amend Green Belt boundaries again at the end of this plan period and help to meet the longer term development needs stretching beyond this plan period.

Taking the above into consideration, we wish to use this opportunity to reiterate that our client’s site should be considered for safeguarded land. The site can deliver a full range and size of housing types including affordable housing and much-needed family housing, within an attractive landscaped setting. The site is also in single ownership and is not constrained by any financial limitations or burdens. As such, the site genuinely has the potential to accommodate housing development during the forthcoming Plan period, if necessary.
In addition to the above, we highlight that our client’s site is in a sustainable location for housing development given its relationship to existing settlements and close proximity to local services and public transport links. We also highlight that the site was formerly used as a sewage works and therefore can be considered as previously developed land. With regards to impact on the Green Belt, we note that the site is within an area of Green Belt (Ref: F4) identified as an area of “low sensitivity” in the Council’s Green Belt and Countryside Study (2013). The site also scores 0 with regard to serving Green Belt purposes.

Summary

For the reasons set out above, we strongly object to the proposed reduction of housing numbers together with the increased number of homes on brownfield sites and the removal of safeguarded land. Furthermore, we believe that a strategy of seeking to maximise urban opportunities purely to avoid the release of sites within the Green Belt will ultimately have a detrimental impact on the quality of life of local residents, particularly young families requiring suitable family housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5104  Respondent: 17524385 / Harold Coleman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp172/5105  Respondent: 17524417 / Michael Laurence Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

Comment ID: pslp172/5106  Respondent: 17524449 / Audrey Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5107  Respondent: 17524481 / Craig Erentiz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

Comment ID: pslp172/5110  Respondent: 17524673 / M. A Paige  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5111  Respondent: 17524737 / Terence Flynn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

Comment ID: pslp172/5119  Respondent: 17524961 / Sophie Schultz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5121  Respondent: 17524993 / J Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5122  Respondent: 17525025 / Beverley Fried  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5123  Respondent: 17525057 / Ian Paley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Comment ID: pslp172/5134  Respondent: 17525505 / Susan Lippitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5136  Respondent: 17525601 / Jenny Finlayson  Agent:

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Comment ID: pslp172/5148  Respondent: 17526561 / Gary Prior  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5149  Respondent: 17526625 / E.W. Fagent  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<td><strong>Attached documents:</strong></td>
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</table>
**Comment ID:** pslp172/5157  **Respondent:** 17526849 / Gillian Nevin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/5158  **Respondent:** 17526913 / Lindy McCall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/5161  Respondent: 17527009 / Alan Weller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5162  Respondent: 17527041 / S Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The following representations are made in respect of the Infrastructure Delivery Plan:

1. Transport - Local Road Network

- LRN14 A331 Blackwater Valley Route

The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

It is welcomed that the GBC Transport Strategy 2017 identifies that Improvements to the Junction of the A331 Blackwater Valley Route with the A31 Hogs Back (LRN14) have been secured as part of a provisional allocation of £12.5 million from the Enterprise M3 Local Enterprise Partnership.

- LRN15 The Street (Tongham) Environmental Improvement Scheme

The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.
However, it is considered, given that impacts in this location are already evident and in the future, are related to strategic growth, the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

Support is given for the updated change in delivery timeframe to between 2018-2026

<table>
<thead>
<tr>
<th>LRN15</th>
<th>The Street (Tongham) environmental improvement scheme</th>
<th>Between 2017 and 2026</th>
<th>Surrey CC</th>
<th>£0.5m Developer Contributions funded / Local Growth Fund</th>
</tr>
</thead>
</table>

- LRN16 A31 Hog’s Back (Tongham to Puttenham)

The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

However, in our opinion given that impacts in this location are already evident and in the future, are related to strategic growth, the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

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- LRN21 New Road bridge and crossing at Ash

The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

While no justification has been provided as to the need for a new bridge crossing, should GBC pursue this aspiration, it is evident that the additional pressure on this crossing is likely to come about as a result of increased movements on the North Downs Line, and strategic road / junction closures and as such the identified mitigation is not solely development related. Therefore, in our opinion for consistency with other strategically driven infrastructure schemes included in the IDP, the wording should be amended to allow for some funding to come via the Local Growth Fund.

<table>
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<tr>
<th>LRN21</th>
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<th>Between 2018 and 2024</th>
<th>Surrey CC</th>
<th>£15m Developer Contributions funded / Network Rail / Local Growth Fund</th>
</tr>
</thead>
</table>

3. Green Infrastructure - SANG

Manor Farm, Tongham forms part of the Strategic Site Allocation A29. As part of the current planning application / appeal, bespoke SANG at Tongham Road, Runfold is to be brought forward. Objection is made to the omission of this bespoke SANG from the list of proposed SANG at Appendix C of the Plan. The proposed SANG should therefore be incorporated as new SANG13 as set out below:
APPENDIX C INFRASTRUCTURE SCHEDULE - INFRASTRUCTURE DELIVERY PLAN

The following representations are made in respect of the Infrastructure Delivery Plan:

1. Transport - Local Road Network
   
   • LRN14 A331 Blackwater Valley Route

   The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

   It is welcomed that the GBC Transport Strategy 2017 identifies that Improvements to the Junction of the A331 Blackwater Valley Route with the A31 Hogs Back (LRN14) have been secured as part of a provisional allocation of £12.5 million from the Enterprise M3 Local Enterprise Partnership.

   • LRN15 The Street (Tongham) Environmental Improvement Scheme

   The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

   However, it is considered, given that impacts in this location are already evident and in the future, are related to strategic growth, the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

   Support is given for the updated change in delivery timeframe to between 2018-2026

   LRN15
   The Street (Tongham) environmental improvement scheme
   Between 2017-2026
   Surrey CC
£0.5m Developer Contributions funded / Local Growth Fund

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/405  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Air Quality Assessment

This document considers the potential effect of the growth proposed in the Local Plan on air quality. Specifically in relation to Ash and Tongham, the report concludes that changes in traffic flows will not lead to an exceedance of the air quality objective. It is therefore confirmed that Air Quality is not a prohibiting factor in bringing forward development in this area. Nevertheless, the report recommends that the findings of the air quality review undertaken to inform the Draft Local Plan should be confirmed by individual developments as part of the planning application process. This precautionary approach which ensures that these issues will be considered and addressed at the detailed design stage is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/672  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

APPENDIX D: EVIDENCE BASE - RESEARCH

Air Quality Assessment

This document considers the potential effect of the growth proposed in the Local Plan on air quality. Specifically in relation to Ash and Tongham, the report concludes that changes in traffic flows will not lead to an exceedance of the air quality objective. It is therefore confirmed that Air Quality is not a prohibiting factor in bringing forward development in this area. Nevertheless, the report recommends that the findings of the air quality review undertaken to inform the Draft Local Plan should be confirmed by individual developments as part of the planning application process. This precautionary approach which ensures that these issues will be considered and addressed at the detailed design stage is supported.
**Comment ID:** pslp173/671  **Respondent:** 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom  
**Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

LRN21 New Road bridge and crossing at Ash
The change from Developer Contributions to Developer Funded for consistency through the IDP is noted. While no justification has been provided as to the need for a new bridge crossing, should GBC pursue this aspiration, it is evident that the additional pressure on this crossing is likely to come about as a result of increased movements on the North Downs Line, and strategic road / junction closures and as such the identified mitigation is not solely development related. Therefore, in our opinion for consistency with other strategically driven infrastructure schemes included in the IDP, the wording should be amended to allow for some funding to come via the Local Growth Fund.

LRN21
New Road bridge and crossing at Ash
Between 2018 and 2024
Surrey CC

£15m Developer Contributionsfunded / Network Rail / Local Growth Fund

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**Comment ID:** pslp172/3119  **Respondent:** 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom  
**Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
The schedule of sites at page 143 of the Submission Local Plan and at Policy A29 itself, indicates a change to the quantum of development proposed for this Strategic Site from 1200 to 1750 dwellings. This is to take into account permissions already granted but which have not yet been delivered due to a shortage of SANG provision. Recognition of this is supported as is the proposed change to the Ash and Tongham Inset Plan (Amendment 10; Ash and Tongham) indicating the inclusion of already consented sites within the Strategic Site boundary. However, objection is made regarding the overall quantum of development proposed at A29 which is currently couched essentially equates to a cap on development ‘approximately 1,750 homes’ but which could be augmented further subject to detailed planning and design. In regard to Sustainable Development, the NPPF states at paragraph 14, that:

‘For plan-making this means that:
- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change’

Further, one of the Core Planning Principles at paragraph 17 of the NPPF states that planning should:

‘Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’

As an example, through detailed planning, land to the west of The Street (SHLAA site 2247) could accommodate a further 50 units. This would reflect Criterion m) of Policy D4 reflecting the need to make the most effective use of available land; it would contribute towards the overall shortfall in supply indicated in the first five years of the Plan; it would contribute towards reinstating the Borough’s objectively assessed housing need to that required through the 2015 SHMA; secure an adequate five year housing land supply and it would contribute towards the Borough’s Duty to Cooperate with its neighbouring authorities in meeting the otherwise unmet needs across the HMA.

It is not therefore considered as currently drafted, that the Proposed Submission Plan reflects the key national requirement for housing growth and a revision to the Policy to either ‘for a minimum’ or ‘at least’ x homes is therefore required.

Policy A29 also seeks the inclusion of an element of self build and custom house building plots. The Government has indicated a commitment to self-build and custom house building plots and there is a requirement for local authorities to keep a register. However, the Government has not yet finalised its stance or published policy in relation to the specifics of the initiative. With the impact of the Brexit referendum and new Government, delays have been introduced, not least in the amendment and republication of the NPPF. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance and self-build and custom housing could be required in due course, in the same way as affordable housing is required within housing developments.

Further, there is little evidence as to the extent of demand for self and custom built houses within the Borough currently. According to the GBC Housing Mix Topic Paper there are 87 individuals on the register in the first base period and 80 who are seeking plots of land in the Borough. Whilst it is recognised that this is a snapshot, it is a very small number across the 19 year plan period - equating to just 4 per annum. The West Surrey Strategic Housing Market Assessment 2015 considered self build opportunities and considered that whilst there could be potential to designate plots within larger schemes, most new delivery would be on small windfall sites.

The Topic Paper goes on to state that there is no definitive number of self-build or custom housebuilding plots sought but that the approach that Guildford Borough Council has taken is to seek flexibility by specifying their inclusion on suitable site allocations over 100 homes. The draft policy within the focussed Proposed Submission goes further than this and specifies that 5% of the total homes shall be available as self-build and custom housebuilding plots ‘whilst there is an identified need’. This approach is both unfounded and arbitrary: There is no basis for the selection of sites of over 100 units in size particularly bearing in mind the conclusion drawn in the SHMA that the majority are likely to come forward on small windfall sites; or the selection of the 5% requirement - the need for which the lpa itself acknowledges is uncertain: ‘whilst there is an identified need’. This level of uncertainty will have an adverse impact on development decisions.

We therefore object to the inclusion of the the requirement for self-build and custom housebuilding at this stage of the Plan making process as being unsound based on inadequate evidence, prematurity in pre-empting confirmation of the
Government’s future policy specifics and the level of uncertainty introduced which will have an adverse impact on
development decisions. Consequently the policy will be ineffective.

Further to the above discussion, the following modifications to Policy A29 are sought:

i) It is recommended that the quantum of development within the strategic site A29, Land to the south of Ash and
Tongham be reviewed to ascertain additional capacity.

ii) At least an additional 50 units to be added to the capacity of land to the West of The Street, Tongham (former
2016 SHLAA site 2247). Reason for the uplift: Reconsideration n the light of further evidence and understanding of
potential capacity.

The Policy should therefore be redrafted as follows:

‘Policy A29: land to the south and east of Ash and Tongham

Allocation: This is a strategic location for development.
The site is allocated for approximately 1,750 at least 1,800 homes, including some self-build and custom house building
plots (C3).’

The Policy also indicates a number of requirements within the Strategic Site. The requirements listed relate variously to the
whole Site Allocation and various constituent sites within the overall Strategic Site. This is both confusing and misleading
and creates uncertainty which should be avoided.

In particular, Requirement (9) requires land and provision of a new road bridge which will form part of the A323 Guildford
Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to
Ash railway station. Whilst the aims of the policy can be supported in general terms, this requirement does not relate to all
of the constituent sites within A29. Objection is made accordingly on the following grounds:

(9) Land and provision of new road bridge

The Land allocation at Ash and Tongham covers a wide area with very different characteristics and as such the impacts on
the local highway network differ considerably between the identified land parcels and as such not all ‘Requirements’ are
directly related to each of the land parcels identified, i.e. the impacts of sites in Tongham and very different to those in Ash.

As has been shown through the planning applications submitted at Land North of Grange Road, Tongham (ref: 17/P/
00529), Land South of Grange Road, Tongham (ref: 14/P/02398) and Land at Manor Farm, The Street, Tongham (ref: 16/
P/00222) the impact in traffic terms at the existing level crossing is de-minimis and has never been raised as an issue by
either Guildford Borough Council or Surrey County Council as the Local Highway Authority.

On the basis of SCC’s review of applications in Tongham, it is evident that a new road is not necessary to support the
delivery of the Allocation sites in Tongham.

Notwithstanding the de-minimis impact from the Tongham sites it is evident from the transport evidence base which
accompanies the emerging Local Plan that:

a) No detailed study has been undertaken on the need or justification of any new bridge crossing. A fit-for-purpose
assessment of future year operation showing the impacts with and without development is required identifying the
cumulative impact and whether development identified in Policy A29 would cause a ‘severe’ impact (ref: para 32 of
the NPPF).

b) No alternatives to a new bridge crossing, such as improving alternative routes, traffic management or a footbridge
only solution have been considered in detail, or any cost benefit analysis provided. As such, the delivery of a new
bridge and closure of the level crossing is merely to meet an aspiration of GBC which is not soundly founded on
robust evidence.

Requiring the Tongham land parcel to assist with the provision of the delivery of the A323 Guildford Road level crossing
does not meet the tests in Paragraph 32 of NPPF where any mitigation should cost effectively limit the impacts of
development. A ‘generic’ approach to collecting an unprecedented level of transport contribution over the whole allocation
towards a scheme which is yet to be justified in transport terms is therefore not Fair and Reasonable and does not meet the requisite tests.

On this basis, in our view, Requirement 9 should be removed from Policy A29 Requirements, as this is:

a) Linked to an aspirational scheme which is not based on robust evidence and is not therefore considered to be sound;
b) Is unlikely to offer any real benefit in terms of reducing journey times or queue lengths on the A323 Guildford Road, and
c) If it can be justified, it will predominately be due to the increased frequency of trains on the North Downs Line, and the closure of other local junctions such as the junction of White Lane and the A31 Hogs Back, which are not related to the delivery of housing at Ash and Tongham i.e. any ‘need’ comes about through the delivery of strategic aims within the plan and not solely as a result of the proposed allocation.

Should GBC wish to continue with the aspiration of a replacement bridge as a strategic infrastructure project then it should be retained as Policy A30, as presented in the previous iteration of the emerging Local Plan.

Alternatively, should it be retained within Policy A29, it should be relocated to the ‘Opportunities’ section of the Policy and clarity should be provided within the Policy to identify that Requirement 9 is not related to the delivery of the Tongham sites.

Policy A29: Land to the south and east of Ash and Tongham

Requirements: (9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.

Under the ‘Key Considerations’ section of Policy A29, consideration (11) recognition should be made to the ability for potential noise and air quality issues to be ‘designed out’ through good planning and design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Suggested amendment: ‘Policy A29: land to the south and east of Ash and Tongham

Allocation: ‘This is a strategic location for development. The site is allocated for at least 1,800 homes (C3).’

Removal of Requirement 9 from Policy A29.

Attached documents:

Comment ID: pslp172/4322  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulson
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
SITE ALLOCATION A29: LAND TO THE SOUTH AND EAST OF ASH AND TONGHAM

The schedule of sites at page 143 of the Submission Local Plan and at Policy A29 itself, indicates a change to the quantum of development proposed for this Strategic Site from 1200 to 1750 dwellings. This is to take into account permissions already granted but which have not yet been delivered due to a shortage of SANG provision. Recognition of this is supported as is the proposed change to the Ash and Tongham Inset Plan (Amendment 10; Ash and Tongham) indicating the inclusion of already consented sites within the Strategic Site boundary. However, objection is made regarding the overall quantum of development proposed at A29 which is currently couched essentially equates to a cap on development ‘approximately 1,750 homes’ but which could be augmented further subject to detailed planning and design. In regard to Sustainable Development, the NPPF states at paragraph 14, that:

‘For plan-making this means that:
- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change’

Further, one of the Core Planning Principles at paragraph 17 of the NPPF states that planning should:
‘Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’

As an example, through detailed planning, land to the west of The Street (SHLAA site 2247) could accommodate a further 50 units. This would reflect Criterion m) of Policy D4 reflecting the need to make the most effective use of available land; it would contribute towards the overall shortfall in supply indicated in the first five years of the Plan; it would contribute towards reinstating the Borough’s objectively assessed housing need to that required through the 2015 SHMA; secure an adequate five year housing land supply and it would contribute towards the Borough’s Duty to Cooperate with its neighbouring authorities in meeting the otherwise unmet needs across the HMA.

It is not therefore considered as currently drafted, that the Proposed Submission Plan reflects the key national requirement for housing growth and a revision to the Policy to either ‘for a minimum’ or ‘at least’ x homes is therefore required.

Policy A29 also seeks the inclusion of an element of self build and custom house building plots. The Government has indicated a commitment to self-build and custom house building plots and there is a requirement for local authorities to keep a register. However, the Government has not yet finalised its stance or published policy in relation to the specifics of the initiative. With the impact of the Brexit referendum and new Government, delays have been introduced, not least in the amendment and republication of the NPPF. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance and self-build and custom housing could be required in due course, in the same way as affordable housing is required within housing developments.

Further, there is little evidence as to the extent of demand for self and custom built houses within the Borough currently. According to the GBC Housing Mix Topic Paper there are 87 individuals on the register in the first base period and 80 who are seeking plots of land in the Borough. Whilst it is recognised that this is a snapshot, it is a very small number across the 19 year plan period - equating to just 4 per annum. The West Surrey Strategic Housing Market Assessment 2015 considered self build opportunities and considered that whilst there could be potential to designate plots within larger schemes, most new delivery would be on small windfall sites.

The Topic Paper goes on to state that there is no definitive number of self-build or custom housebuilding plots sought but that the approach that Guildford Borough Council has taken is to seek flexibility by specifying their inclusion on suitable site allocations over 100 homes. The draft policy within the focussed Proposed Submission goes further than this and specifies that 5% of the total homes shall be available as self-build and custom housebuilding plots ‘whilst there is an identified need’. This approach is both unfounded and arbitrary; There is no basis for the selection of sites of over 100 units in size particularly bearing in mind the conclusion drawn in the SHMA that the majority are likely to come forward on small windfall sites; or the selection of the 5% requirement - the need for which the lpa itself acknowledges is uncertain: ‘whilst there is an identified need’. This level of uncertainty will have an adverse impact on development decisions.
We therefore object to the inclusion of the requirement for self-build and custom housebuilding at this stage of the Plan making process as being unsound based on inadequate evidence, prematurity in pre-empting confirmation of the Government’s future policy specifics and the level of uncertainty introduced which will have an adverse impact on development decisions. Consequently the policy will be ineffective.

i) It is recommended that the quantum of development within the strategic site A29, Land to the south of Ash and Tongham be reviewed to ascertain additional capacity.

ii) At least an additional 50 units to be added to the capacity of land to the West of The Street, Tongham (former 2016 SHLAA site 2247). Reason for the uplift: Reconsideration in the light of further evidence and understanding of potential capacity.

The Policy should therefore be redrafted as follows:

`Policy A29: land to the south and east of Ash and Tongham

Allocation: This is a strategic location for development. The site is allocated for approximately 1,750 at least 1,800 homes, including some self-build and custom house building plots (C3).`

The Policy also indicates a number of requirements within the Strategic Site. The requirements listed relate variably to the whole Site Allocation and various constituent sites within the overall Strategic Site. This is both confusing and misleading and creates uncertainty which should be avoided.

In particular, Requirement (9) requires land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station. Whilst the aims of the policy can be supported in general terms, this requirement does not relate to all of the constituent sites within A29. Objection is made accordingly on the following grounds:

(9) Land and provision of new road bridge

The Land allocation at Ash and Tongham covers a wide area with very different characteristics and as such the impacts on the local highway network differ considerably between the identified land parcels and as such not all ‘Requirements’ are directly related to each of the land parcels identified, i.e. the impacts of sites in Tongham and very different to those in Ash.

As has been shown through the planning applications submitted at Land North of Grange Road, Tongham (ref: 17/P/00529), Land South of Grange Road, Tongham (ref: 14/P/02398) and Land at Manor Farm, The Street, Tongham (ref: 16/P/00222) the impact in traffic terms at the existing level crossing is de-minimis and has never been raised as an issue by either Guildford Borough Council or Surrey County Council as the Local Highway Authority.

On the basis of SCC’s review of applications in Tongham, it is evident that a new road is not necessary to support the delivery of the Allocation sites in Tongham.

Notwithstanding the de-minimis impact from the Tongham sites it is evident from the transport evidence base which accompanies the emerging Local Plan that:

a) No detailed study has been undertaken on the need or justification of any new bridge crossing. A fit-for-purpose assessment of future year operation showing the impacts with and without development is required identifying the cumulative impact and whether development identified in Policy A29 would cause a ‘severe’ impact (ref: para 32 of the NPPF).

b) No alternatives to a new bridge crossing, such as improving alternative routes, traffic management or a footbridge only solution have been considered in detail, or any cost benefit analysis provided. As such, the delivery of a new bridge and closure of the level crossing is merely to meet an aspiration of GBC which is not soundly founded on robust evidence.

Requiring the Tongham land parcel to assist with the provision of the delivery of the A323 Guildford Road level crossing does not meet the tests in Paragraph 32 of NPPF where any mitigation should cost effectively limit the impacts of development. A ‘generic’ approach to collecting an unprecedented level of transport contribution over the whole allocation...
towards a scheme which is yet to be justified in transport terms is therefore not Fair and Reasonable and does not meet the requisite tests.

On this basis, in our view, Requirement 9 should be removed from Policy A29 Requirements, as this is;

a) Linked to an aspirational scheme which is not based on robust evidence and is not therefore considered to be sound;

b) Is unlikely to offer any real benefit in terms of reducing journey times or queue lengths on the A323 Guildford Road, and

c) If it can be justified, it will predominately be due to the increased frequency of trains on the North Downs Line, and the closure of other local junctions such as the junction of White Lane and the A31 Hogs Back, which are not related to the delivery of housing at Ash and Tongham i.e. any ‘need’ comes about through the delivery of strategic aims within the plan and not solely as a result of the proposed allocation.

Should GBC wish to continue with the aspiration of a replacement bridge as a strategic infrastructure project then it should be retained as Policy A30, as presented in the previous iteration of the emerging Local Plan.

Alternatively, should it be retained within Policy A29, it should be relocated to the ‘Opportunities’ section of the Policy and clarity should be provided within the Policy to identify that Requirement 9 is not related to the delivery of the Tongham sites.

**Policy A29: Land to the south and east of Ash and Tongham**

**Requirements:** (9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.

Under the ‘Key Considerations’ section of Policy A29, consideration (11) recognition should be made to the ability for potential noise and air quality issues to be ‘designed out’ through good planning and design.

1. **Policy 12a section**

Additional requirement 12 relates to the provision of a green buffer to minimise the noise and air quality issues adjacent to site A31 and A331.

In relation to air quality issues the recent AECOM assessment confirms that air quality is not a restrictive matter. Further, in terms of noise issues these can be dealt with in a number of ways including a range of mitigations measures to include detailed building design, layout design and a suitable standoff.

These matters can be suitable dealt with at the detailed planning stage.

A green buffer is therefore not required. It is therefore recommended that requirement 12 is not required and should be deleted from the emerging policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Further to the above discussion, the following modifications to Policy A29 are sought:

i) It is recommended that the quantum of development within the strategic site A29, Land to the south of Ash and Tongham be reviewed to ascertain additional capacity.

ii) At least an additional 50 units to be added to the capacity of land to the West of The Street, Tongham (former 2016 SHLAA site 2247). Reason for the uplift: Reconsideration in the light of further evidence and understanding of potential
The Policy should therefore be redrafted as follows:

‘Policy A29: land to the south and east of Ash and Tongham
Allocation: This is a strategic location for development.
The site is allocated for approximately 1,750 at least 1,800 homes, including some self-build and custom house building plots (C3).’

Recommended Changes to Policy A29: Land to the south and east of Ash and Tongham
Requirement: (9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.
Requirement 12: Green buffer to minimise potential noise and air quality issues adjacent to the A31 and A331.

Attached documents:

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The aspiration for high quality design as set out in the criteria at Policy D4 is generally supported. In particular criteria ( ) which seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context. Criteria ( ) deals with the effect of development on the amenity enjoyed by the occupants of buildings. Whilst this general statement is supported, it is important that conclusions are not drawn disproportionately at the outline stage, rather that due consideration is made at the detailed planning stage. Therefore it is considered that an amendment to this criterion should be made to clarify the role of the detailed design stage.

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POLICY D4: CHARACTER AND DESIGN OF NEW DEVELOPMENT
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Attached documents:

Comment ID: pslp171/1432  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Government has indicated a commitment to self-build and custom house building plots and there is a requirement for local authorities to keep a register. However, the Government has not yet finalised its stance or published policy in relation to the specifics of the initiative. With the impact of the Brexit referendum and new Government, delays have been introduced, not least in the amendment and republication of the NPPF. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance and self-build and custom housing could be required in due course, in the same way as affordable housing is required within housing developments.

Further, there is little evidence as to the extent of demand for self and custom built houses within the Borough currently. According to the GBC Housing Mix Topic Paper there are 87 individuals on the register in the first base period and 80 who are seeking plots of land in the Borough. Whilst it is recognised that this is a snapshot, it is a very small number across the 19 year plan period - equating to just 4 per annum. The West Surrey Strategic Housing Market Assessment 2015 considered self build opportunities and considered that whilst there could be potential to designate plots within larger schemes, most new delivery would be on small windfall sites.

The Topic Paper goes on to state that there is no definitive number of self-build or custom housebuilding plots sought but that the approach that Guildford Borough Council has taken is to seek flexibility by specifying their inclusion on suitable site allocations over 100 homes. The draft policy within the focussed Proposed Submission goes further than this and specifies that 5% of the total homes shall be available as self-build and custom housebuilding plots ‘whilst there is an identified need’. This approach is both unfounded and arbitrary: There is no basis for the selection of sites of over 100 units in size particularly bearing in mind the conclusion drawn in the SHMA that the majority are likely to come forward on small windfall sites; or the selection of the 5% requirement - the need for which the lpa itself acknowledges is uncertain: ‘whilst there is an identified need’. This level of uncertainty will have an adverse impact on development decisions.

We therefore object to the inclusion of the specifics of the requirement for self-build and custom housebuilding at this stage of the Plan making process as being unsound based on inadequate evidence, prematurity in pre-empting confirmation of the Government’s future policy specifics and the level of uncertainty introduced which will have an adverse impact on development decisions. Consequently the policy will be ineffective. The policy should remain as a supporting policy to encourage self-build and custom housebuilding and which can therefore respond flexibly to market demand rather than in
its current form which is couched as an arbitrary and unjustified requirement. It is therefore recommended that the Policy be amended to remove these specific elements as follows:

**Policy H1: Housing for all**

...  

**Self-build and custom housebuilding**

(9) Self build and custom house building  
Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character where it reflects the identified need within a locality. Such provision will be encouraged on windfall sites of any size. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding lots are encouraged on smaller residential development sites.

(10) Self build plots made available must respond to the sizes identified on the register. Plots must be made available and priced and marketed appropriately as self-build or custom build plots for at least 18 months.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy H1: Housing for all  

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** pslp171/1430  **Respondent:** 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom  
**Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P3: COUNTRYSIDE**

Changes proposed to paragraph 4.3.29 of the Submission Local Plan confirm that the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area is allocated as a strategic location for development. This statement, the subsequent allocation of A29 as a strategic site and the corresponding inclusion of the site within the defined urban area are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** pslp171/2704  **Respondent:** 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom  
**Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;

This figure was then adjusted to include:

- Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;

- Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation;

The Guildford Addendum Report, 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that ‘Uncertainty will
continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU'.

In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the borough and that these should revert to the 2015 West Surrey SHMA figures.

**Duty to Cooperate**

In our previous representations we highlighted the reference made in the Housing Delivery Topic Paper to the Memorandum of Understanding on housing delivery which was signed by the three authorities in the Strategic Housing Market Area, Guildford, Waverley and Woking. The MoU recognised that there is unmet need within the HMA and committed the three authorities to continued joint working to ensure housing needs across the HMA are met in full.

It is therefore also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the view expressed in the Topic Paper that Guildford is unable to sustainably accommodate any unmet need arising from Woking despite a rigorous justification to support that view, and the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough. Further scrutiny of the constraints and opportunities for accommodating further development within Guildford to meet the overall needs of the SHMA must therefore be undertaken before the Duty to Cooperate can be considered to be appropriately discharged.

**Five-year Supply of Housing Land**

The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan is therefore currently considered unsound in this respect.

Where there is scope to increase the quantum of development on the proposed allocations this should be considered and an adjustment made to the numbers accordingly.

**Soundness**

As a consequence, of the discussions above, objection is made to the Plan’s ’Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034.

The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly the Plan is currently considered to be unsound and the following amendments are sought:

i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

SPATIAL VISION AND POLICY S2: BOROUGH-WIDE STRATEGY

Reference should also be made to the HBF representation which, as members, we fully support. Objectively Assessed Housing Need

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

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Further points of observation and objection are set out below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction
1. These representations are submitted on behalf of Mr Stephen Isaac (who owns the greater part of site A41) and the Raleigh School. They are to address proposed changes in the amended draft local plan.

2. The south-west part of A41 (extending to some 1.05 ha and identified as parcel 7 on the conceptual plan) is owned by Mr Duncan Roe but who is not a party to these representations. It is relevant to note that Mr Stephen Isaac has a binding covenant over "parcel 7" prohibiting the erection of any buildings without his consent: accordingly he is able to control any development over that part of A41.

Previous Submissions
3. On 15 July 2016 submissions were made to, primarily, relocate the Raleigh School from its present 2 sites onto A41 and to increase it from a 2FE to a 3FE primary school: this partly to take up the existing waiting list but also having regard to the inevitable additional need arising from the new housing proposed in the locality. The cost being funded through the redevelopment of the school's existing sites.

4. It is not intended to repeat the points made in the previous submissions but, instead, to append them to these further (current) submissions.

Current Submissions
5. From the response to our July 2016 submissions it would appear that the principle reason for not accepting the relocation of the Raleigh School onto A41 was the uncertainty as to the viability and, therefore, deliverability of the site for that purpose. These submissions, therefore, address the viability (and hence deliverability) of the site.

Enclosures
i. Location Plan to identify the Raleigh School and A41 in the context
ii. Site A-11: Conceptual Master Plan (July 2017)
iii. Indicative housing site layout for the Raleigh School campus site
iv. A copy of the July 2016 Submissions

6. Before dealing with the viability aspects we would point out that, having considered public views, the conceptual plan has been amended to substantially reduce the extent of housing from 1.45 ha down to some 0.50 ha. Thus, rather than 20 very low density dwellings, it is now proposed to have 10 smaller low/medium density dwellings. The effect of this is to increase very significantly the amount of open green space. It will be noted that the area now proposed to be utilised either as open playing fields or as paddocks is increased by over 50% from the July 2016 proposal to some 3.3 ha: now virtually 70% of the site.

7. The location of the new school and its associated car park has also been moved closer to East Lane which we believe is a more realistic site for the built part of the new school. In addition a drop-off/pick-up parking area is shown intended to be formed by a green "Grasscrete" type construction.

8. In order to assess the viability it is necessary to have a realistic assessment of the number of dwellings that the school's existing two sites might accommodate. For this purpose an indicative, policy compliant, layout plan has been produced for the main campus site (that extends to some 1.09 ha) which, being a slightly awkward shape and surrounded by housing, has to have proper respect to adjoining properties.

9. The indicative layout plan shows 17 x 3 and 4-bedroom open market dwellings and 11 (39.3%) x 2 and 3-bedroom affordable dwellings. In addition 0.13 ha of public open space is indicated. This gives a density of some 25.7 dph on the...
The playing field site extends to some 1.34 ha and has the benefit of full vehicular and pedestrian access over Weston Lea with such right of way having been reserved when the Weston Lea site was sold by Surrey County Council to New Ideal Homes in 1984 and where specific reference in the reservation was made in the possible residential development of the playing field site.

We are aware that, at present, the Environment Agency Flood Map for Planning indicates the east half of the playing field as being within Flood Zone 3. We have had informal discussions with the promoters of site A39 who have advised that the EA has accepted that their Flood Map is incorrect and are in the process of redrawing it. The effect will be that, probably, no more than 0.25 ha will be within Flood Zones 2 or 3. With local evidence indicating that the playing field has not suffered from flooding in living memory it would be appropriate to utilise part of that 0.25 ha as public open space. Thus a realistic assessment for the playing field is some 35 dwellings.

The school has taken formal advice of Knight Frank which suggests that (based upon planning permission being granted for the redevelopment as outlined) the two sites should yield a land value of some £13.0 million allowing for a 40 affordable housing provision. It is relevant to note that GBC has the ability to reduce the affordable housing provision where viability may be an issue. Thus the affordable housing provision was reduced to 20% this would add some £2.0 million to the land value.

The 10 houses proposed for A41 should realise a land value of £2.5 million. A further factor is that there will be significant Infrastructure Contributions from the new housing proposed under the new local plan within the school's catchment area. This should generate a further, approximate, £1.5 million available for primary education provision that should be made available specifically for the benefit of the third form entry element of the new Raleigh School: such being largely required to service those new dwellings.

Thus the redevelopment of the Raleigh's existing 2 sites, the 10 dwellings proposed on A41 and the infrastructure contributions should yield an aggregate of some £17 million (or £19 million if the affordable housing is reduced to 20%) for the new 3FE primary school and sports hall on A41.

It is further relevant to note that this does not factor in any financial contribution from Surrey County Council, as the statutory education provider, for the third form element of the 3FE primary school.

Based upon information provided to us by Surrey County Council an "all in" cost for the new 3FE primary school (as indicated on the conceptual plan) is likely to be some £13.0 million. The sports hall will add a further £2.5 million giving an aggregate of some £15.5 million. Thus there is an approximate £1.5 million (or £3.5 with a 20% affordable provision) cushion between the anticipated development costs and the land value (including infrastructure contribution) proceeds.

The Raleigh School would not embark on this project unless they were confident that it was a financially viable proposition. We trust that this further information will demonstrate that viability (and hence deliverability) is not an issue. Accordingly the amended draft local plan can be further amended to reflect the redevelopment of the Raleigh School's existing sites and its relocation onto A41 as proposed.

Proposed designation of Playing Field

We were concerned to see the proposal to designate the West Lea playing field as Open Space. Entirely without prejudice to the submissions detailed above, if you are still minded not to accept the relocation of the Raleigh School onto A41 then we consider the designation of the playing field as Open Space would be wholly inappropriate for a piece of land that would then, by necessity, remain a private playing field for a primary school. Thus, under those circumstances, the designation of that land should remain purely for what it is (and therefore would continue to be): Playing Fields.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [LP2017 - Scanned - Philip J C. Stone.pdf (1.8 MB)]

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Comment ID: pslp171/3264  Respondent: 17580289 / Linda Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The removal of 4.2.8 on density is short-sighted and inappropriate. Density guidelines make the best use of land in the context of the area, its local character and housing type requirements. Therefore a policy to cover minimum and maximum densities is essential.

The provision of a prescribed number of affordable homes in any development is supported. However the viability clause is open to abuse and in practise could be unenforceable. 4.2.40 needs strengthening as it allows developers to exert pressure for profit over market affordability by stating ‘non-viability’.

I object to Policy H1 and H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3266  Respondent: 17580289 / Linda Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 2017 Plan makes a stronger case for the delivery of infrastructure for all new developments. However given the number of statutory bodies involved in its provision, and it being dependent on planning being granted, details seem piecemeal, non-existent or not developed properly.

For example ID1, the proposed construction of slip roads onto A3 at Ripley, Send and Burpham as part of the site allocations at Wisley Airfield, Garlick Arch and Gosden Hill Farm (all in an 8 mile stretch from A3/M25 to Burpham) has not taken into consideration the repercussions on the local roads of the adjacent villages, already congested and poorly maintained.
In policy ID3 there is a strong suggestion that walking and cycling are sustainable modes of transport in outlying rural areas where roads are already congested and poorly lit. This is not a realistic proposition, nor practical. Also, a suggested provision of a bus network, whilst ideal, is unlikely to be economic in the long-term and therefore unsustainable.

I object to Policy ID.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3265  Respondent: 17580289 / Linda Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removing the 5 tests for development in an ANOB has made for a weaker policy for controlling development in these areas. This goes against the stated aim that ANOBs should be protected as a high priority.

I object to Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3262  Respondent: 17580289 / Linda Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Despite Guildford Borough Council’s policy statement that it will seek to protect the Green belt from inappropriate development, 65% of the new housing is still set to be in the Green Belt, contrary to NPPF requirements stating ‘exceptional circumstances’.

In 4.3.13 of this policy it is stated that 14 villages are now ‘inset’ (removed) from the Green Belt. This is incorrect as it is only a proposal in the Plan and therefore presumptions in favour of developments in these areas of Green Belt cannot be made.

The insetting of villages and the extension of settlement boundaries is opposed as it further erodes the Green Belt and makes them vulnerable to over-development. The Green belt provides a buffer to urban sprawl and stops villages coalescing physically and visually into concrete conurbations. Guildford Borough Council recognises this for the villages
of Ash and Tongham where it emphasises the need for restrained development and retention of the green corridor between Ash/Tongham and Aldershot. Insetting, infilling and changing settlement boundaries of a large number of villages will invite further insetting if the Green Belt policy is not strengthened and enforced.

I object to Policy P2.

Whilst there is a small reduction in numbers of new homes in the Green belt from the 2016 Plan, there are still a very large number in the Green Belt and the eastern rural part of the Borough has by far the greatest and disproportionate number allocated compared to the other parts of the Borough when percentage allocation is applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3263  Respondent: 17580289 / Linda Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The stated provision for the revised number of houses is 12,426 which I believe is still excessive particularly when the report by Neil McDonald on the West Surrey SHMA is taken into account.

The figure 4.1.9a Annual Housing Target shows the housing number totals 9810 over the Plan period. This is a discrepancy of 2616 - why?

I object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslq17q/660  Respondent: 17580289 / Linda Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is very disappointing that the 2017 version of the Local Plan remains virtually unchanged from the 2016 version despite 32,000 comments from the Borough’s residents being sent in last year. That the revised Plan still relies on inaccurate evidence is concerning, particularly where it distorts estimates of housing needs for the life of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/722  Respondent: 17609921 / Clare and Keith Spacie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We note that the topic papers for housing describe development of Guildford College land for student accommodation as in progress (para 4.63 housing delivery). This is of concern as the current application for permission is highly controversial and has attracted many objections. As an application for over 500 bed units it is more than double the size put forward in the Local Plan housing mix paper and clearly totally unsuitable to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/723  Respondent: 17609921 / Clare and Keith Spacie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are pleased to see that the inset area for the Horsley excludes the area beyond the A246 and that proposals to consider Clandon Golf Club land for development have been dropped. Both would have been significant encroachments on genuinely open land and potentially led to infill development along a substantial corridor between Merrow and beyond East Horsley village. We agree that no further allocation should be made for housing in this area to preserve its rural character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4970  Respondent: 17616161 / Kevin & Susan Fealey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley
Correct title of Policy A28 to say Ash Green, and not Ash.

- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: pslp172/4956  Respondent: 17616161 / Kevin & Susan Fealey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This
should must include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

   a) The Street in Tongham
   b) A331/A323 intersection
   c) A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

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Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: pslp171/3378  Respondent: 17630465 / Sussex and Surrey Police (Andrew Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: Character and design of new development – page 119

Secured by Design (SBD)

Surrey Police welcome the inclusion of part c which states that amongst other considerations that all developments will ‘create attractive, safe and accessible places that discourage crime and disorder through design’. This policy would currently be ineffective at reducing crime unless there was specific reference included to ‘Secured by Design’ standards. Inclusion of SBD in either Chapter 3 (Spatial Vision) or Policy D4 (Character and design of new development) would be essential to ensure there is sufficient policy justification to make new developments safe and minimise opportunities for crime and disorder. Secured by Design is actively promoted by our Crime Prevention Design Advisors who work with applicants to ensure opportunities for crime are minimised through good design.
Surrey Police recommend that Policy D4 should be amended to state that high quality design is expected in the borough. All developments will:

c) create attractive, safe and accessible places that discourage crime and disorder through design and the application of Secured by Design standards.

SBD has been adopted in a variety of schemes in the Borough of Guildford. A number of examples are listed below:

- 14/P/02259 | Erection of twelve residential dwellings with change of use from D1/D2 to C3 wing demotion existing social club | Corporation Club,

- 06/P/02309 | Outline planning application is sought for a mixed use scheme adjacent to the railway line within an E-shaped courtyard development rising from three floors to five floor levels with basement parking, providing office units & residential on ground floor and first floors with residential above (in total 177 residential units) following demolition of two existing office units | 1-2, Station View, Guildford, GU1

- 14/P/00474 | Redevelopment of existing garage site and replace with four x 1 bedroom apartments (amended plans received 08/05/14 showing two windows in the eastern elevation of the building) | Park Barn Drive Garages, Park Barn Drive Access To Garages, Guildford

- 05/P/00474 | Redevelopment of existing garage site and replace with four x 1 bedroom apartments (amended plans received 08/05/14 showing two windows in the eastern elevation of the building) | Park Barn Drive Garages, Park Barn Drive Access To Garages, Guildford

- Mixed use development (Waitroise) including the erection of 45 flats and 3 townhouses at the site formally known as the Bellerby Theatre, the Guildford Youth and Community Centre and the Live and Let Live PH.

Secured By Design is the UK Police flagship initiative, supporting the principles of ‘designing out crime’ by use of proven crime prevention measures and measurable and appropriate security standards. Creating a sense of place where residents and legitimate users are able to go about their daily routine without unduly fearing crime or insecurity is a key element of the Secured by Design initiative for New Homes. This is reflected by the National Planning Policy Framework 2012 (NPPF 2012) where its purpose is to provide ‘a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; (para. 7). Sustainable development seeks to ‘improve the conditions in which people live, work, travel and take leisure’ (para. 9). Core planning principles should ‘always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings’ (para. 17).

Crime should not be seen as a standalone issue, to be addressed separately from other design considerations. That is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation.

Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions.

To ensure more developers are aware of SBD and that the principles of SBD are adopted in future development proposals, direct reference to ‘Secured by Design’ within development management policies is strongly recommended. Among the many benefits of SBD for future occupants, direct reference to SBD would ensure local plan compliance with the relevant paragraphs of the NPPF and NPPG guidance. We have suggested a recommended wording for an emerging development management policy to ensure reference to SBD is appropriately worded and to ensure that the Local Plan is compliant with the relevant policies of the NPPF concerning policing.

Unfortunately developers stating in their Design and Access Statement that they have ‘provided measures to achieve a development that responds to the key principals of Secured by Design’ does not ensure SBD will be adopted in the development.

Local Authorities must ensure that an application is made for a full Secured by Design (SbD) award and ensure that a planning condition be applied to require the development to SBD standards. Our Crime prevention design advisors will then work with applicants to ensure an assessment on all SBD matters is achieved and that the required standards are met to achieve a completion certificate.
Access for emergency vehicles

Surrey Police consider that reference to providing sufficient access for emergency service vehicles should be included within Policy D4 of the local plan. All developments will:

a) Ensure sufficient access is provided for emergency services – police, fire service and ambulance services.

This is an important planning consideration for assessing new housing developments. Minimising obstructions to emergency vehicles is essential to help reduce response times and the ability of emergency services to access new homes and casualties in need.

With new developments including adopted and non-adopted roads, developers should ensure that there are no obstructions or reductions in road widths which would impact the ability of emergency service crews to service developments. Providing reference to access for emergency services to new development within local planning policy is considered necessary to raise awareness of this issue and ensure compliance with the relevant paragraphs of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford has an active economy which provides a range of cultural, social and entertainment facilities for both day and evening use to serve the people living in the surrounding area. Surrey Police recognises the importance and economic benefits of expanding the evening/night time-time economy. Ensuring the night time economy is well managed and controlled through effective planning is an essential to ensure crime and incidents of anti-social behaviour are minimised. Surrey Police recommend that the evening/night-time economy should be subject to a new specific planning policy with the Local Plan. In order to be constructive, we have set out below our suggested wording for a policy that would resolve our concerns and ensure the Local Plan is sound in relation to planning for this type of development:

‘Policy ?? – The Evening and Night-time Economy

The Council will welcome development that create safe, balanced and socially responsible evening and night time leisure in the Borough. An enriched mix of uses will be encouraged to achieve this including late-night shopping, cultural and theatrical activities, cafes, restaurants, pubs and bars.

Developments linked to the evening and night-time economy will be required to implement safeguards by contributing towards public realm, public transport and other infrastructure improvements to deliver a sense of well being, safe and security. This will involve ensuring activity is facilitated during the daytime to avoid the clustering of ‘dead’ frontages.

Working in partnership with the Council and other stakeholders, owners and operators of evening and night-time economy related development will be expected to take part in active management measures to help the public and support the emergency services.
If the above is achieved no development on its own, or cumulatively with other uses, will create an unacceptable impact on neighbouring uses, residents or the surrounding area by reason of noise and pollution, light pollution, anti-social behaviour, crime, disturbance or traffic. In necessary planning conditions and legal agreement will be implemented to ensure this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3377  Respondent: 17630465 / Sussex and Surrey Police (Andrew Taylor)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To ensure our representations are as concise as possible we have only responded to those parts of the new Local Plan that directly relate to the priorities of Surrey Police to reduce crime and opportunities for crime in in the Borough, whether this be existing or new development.

The emerging local plan should include sound policy to reduce opportunities for crime and disorder to ensure the local plan is fully compliant with paragraphs 17, 58, 69, 70, 156, 162, and 177 of the National Planning Policy Framework (NPPF). Providing a sound basis for crime prevention within adopted planning policy will improve the quality of new development and ensure the advice provided by our crime prevention design advisors is supported by development control officers and adopted by all future applicants.

Chapter 3: Spatial Vision – page 21

Strategic objective 3 – page 24

Surrey Police welcome the support and inclusion of ‘Strategic objective 3’ requiring all development to be of high quality design and enables people to live safe, healthy and active.

lifestyles. This is drafted in line with paragraph 69 of the National Planning Policy Framework (NPPF), which states that planning policies should aim to achieve places which promote safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

This policy would be furthered strengthened through direct references to ‘Secured by Design’ and reducing crime and anti-social behaviour. In so doing, it would bring the Spatial Vision into closer alignment with Policy D4 (Character and design of new development).

Surrey Police strongly recommend the addition of the following Strategic objective under the heading of ‘Society’.

- Reducing crime, anti-social behaviour and the perception of crime through the application of Secured by Design standards and attaining the Secured by Design award. (recommended wording)

Furthermore, National Planning Practice Guidance is very clear that:

‘Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The
prevention of crime and the enhancement of community safety are all matters that a local authorities should consider when exercising its planning functions under the Town and Country Planning legislation.

Local Authorities may, therefore, wish to consider how they consult their Police and Crime Commissioners on planning applications where they are Statutory Consultees and agree with their police force how they will work effectively together on planning matters.

It is important that crime reduction-based planning measures are based upon a clear understanding of the local situation, avoiding making assumptions about the problems and their causes. Consideration also needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities. This means working closely with the police force to analyse and share relevant information and good practice.

Strategic objective 12 – page 26

Surrey Police are concerned over the existing core theme regarding infrastructure and the limited detail relating to other infrastructure providers with the exception of transport. There is no recognition to emergency services within strategic objective 12 or 13. Improving health, education, life-long learning and well-being of all sectors of the community will not be achieved if that same community is not safe, secure and does not have adequate access to the emergency services.

In this respect, the Council’s attention is drawn to the fact that there is a significant body of Secretary of State and Planning Inspectorate decisions supporting the principle of developer contributions towards policing to mitigate against housing growth. These decisions can be summarised in Appendix 1.

Surrey Police consider that the current lack of reference to specific infrastructure providers is inconsistent with paragraphs 17, 58, 69, 70, 156. 177 and 186 of the National Planning Policy Framework (NPPF).

To address these concerns, Surrey Police proposed strategic objective 12 is replaced with the following:

12. To facilitate the timely provision of social and physical infrastructure necessary to improve health, education, life-long learning, well-being, safety and security of all sectors of the community.

And / or

‘Linking new development where appropriate, to the improvement of health, education, life-long learning and the emergency services.

Policy ID1: Infrastructure and delivery – page 122

Policy ID1 outlines the infrastructure necessary to support development and mitigate its otherwise adverse impacts. Policy ID1 does not state which types of infrastructure will be supported, however further explanation is given in the subsequent ‘definitions’ section.

Guidance note 4.6.2 does states “Infrastructure is a very broad term. The Planning Act 2008 as amended defines infrastructure as roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces. Guidance on the CIL also advises that infrastructure also includes cultural and sports facilities, district heading schemes, police stations and other community facilities.

The definition of policing infrastructure is however far more broad than ‘police stations’ and encapsulates a wide variety of infrastructure necessary for policing. For this reason, Surrey Police request ‘police station’ is replaced by ‘police infrastructure’.

Nationally, the Force ensure we take regular legal advice and guidance from industry professionals on the applicability of NPPF tests relating to the application of Regulation 122 on our funding requests for S106 agreements and Infrastructure Delivery Plans. This included advice as to what is infrastructure which can be summarised as follows:
The first point to note is that “infrastructure” is not a narrowly defined term. Section 216 of the Planning Act 2008 provides a list of “infrastructure” but is clear that that list is non-exhaustive. That fact is demonstrated by the use of the word “includes” prior to the list being set out.

There is no difficulty in the proposition that contributions towards Police infrastructure can be within the definition of infrastructure for the purposes of the 2008 Act. In policy terms this is reinforced by the reference to security infrastructure in paragraph 156 of the National Planning Policy Framework.

Infrastructure is not limited to buildings and could include equipment such as vehicles, communications technology, and surveillance infrastructure such as CCTV.

Assessing the impact of housing growth in Guildford on policing capacity and police infrastructure

The emerging Guildford Local Plan makes provision for at least 12,426 homes in Guildford between 2015 and 2034 (an average of 654 homes a year), which will accommodate 31,562 additional persons at various allocated sites (based on 2011 census average household size).

Surrey Police records indicate that there were a total of 28,190 incidents recorded between the beginning of April 2016 and the end of March 2017. Of these incidents there were 8,520 recorded crimes which is only 28% of all recorded incidents. This results in approximately 0.508 incidents per household in the Borough or 0.2 incidents per person that require a police response in Guildford over the past year. The growth outlined in the emerging local plan would result in an additional 6,312 incidents each year to be investigated (once full occupation is achieved). The number of recorded incidents would rise by approximately 332 incidents per year.

On average each police officer in Guildford attends approximately 141 incidents per year. These incidents range widely in complexity because of the statutory duties placed on the police force to respond to vulnerable persons. Surrey Police deliver crime prevention and presence, attendance and service lead at emergencies (e.g. traffic accidents, flooding counter terrorism and community reassurance. We must also attend all incidents involving deaths, attend crown and events policing, attend and input to community safety and crime partnerships, and provide referral responses when there are expressed concerns about the safety of children, the elderly and those with special needs. Common day-to-day incidents involve the detection and apprehension of intoxicated drivers, burglaries, various types of assault or domestic incidents and many more incidents which require police attention.

The emerging Local Plan proposes a significant increase to the housing stock of Guildford. This will be achieved through developing a range of strategic green and brownfield sites including Wisley Airfield. There is relatively little demand for emergency services from what are, in many cases, open fields or brownfield sites. Following redevelopment of these sites for housing and other uses, Surrey Police will have permanent, on-going demands placed upon our service. Ensuring Surrey Police are supported with the appropriate capital infrastructure to police these new developments is an essential planning policy consideration to be addressed in the emerging Local Plan and the subsequent Community Infrastructure Levy.

These additional crime, anti-social behaviour incidents and public safety/welfare incidents will translate into the following day-to-day impacts upon Surrey Police:

- Additional calls and response per year via the police control centre;
- Additional non-emergency events to follow up with public contact each year;
- Attendance to additional emergency events within areas of new development each year;
- Additional anti-social events to follow up with public contact each year;
- Increased demand for patrol cover including investment in new vehicles and other modes of transport for police officers;
- Additional demand for ANPR technologies (vehicles enabled or fixed site);
- Additional demands for new officers which incurs significant start-up costs through equipment and start-up training costs;
- Additional space in custody suites and other specialist policing functions;

The Council can be assured that the provision of new infrastructure to support the emergency facilities is supported by judgements from the High Court and appeal decisions made by the Secretary of State and Planning Inspectors. The following section outlines some of the key High Court rulings which set the legal principle of contributions towards policing.
High Court and appeal decision in favour of developer contributions towards policing

The principle of developer contributions towards policing has been tested in two notable High Court challenges (Appendix 2 & 3). There are also numerous appeal decisions in favour of developer contributions included the recent positive Secretary of State decision (Appendix 4) in favour of our partner force, Sussex Police.

The principle of developer contributions towards police infrastructure (and the definition of infrastructure) to support development growth was recently upheld by the High Court (22/11/16), in the case of Jelson Limited vs Secretary of State for Communities and Local Government and Hinkley and Bosworth Borough Council [2016] EWHC 2979 (Admin). As copy of this judgement is attached as Appendix 2. This High Court judgement included the following items as capital infrastructure considered necessary to support policing and confirming all items of infrastructure were fully compliant with CIL Regulation 122:

- Personal equipment (workstation, radios, protective equipment, uniforms, bespoke one-off training)
- Police vehicles
- Radio cover
- CCTV cameras
- Automatic Number Plate Recognition cameras
- Improvement to control room capacity / police national database
- Premises – Adaption/improvements to existing station

Jelson Limited’s argument against the police contribution are contained in paragraphs 73-76 of the enclosed High Court judgement. In summary, Jelson Limited argued the following:

- As the population of an area increased so the overall rate of crime in a police area, and hence the demands placed upon resources, declined.
- The Planning Inspector had not properly assessed the evidence submitted by Leicestershire Police. Has the Inspector done so, she would have rejected Leicestershire Police’s Section 106 contribution request.

Mr Justice Green wholly rejected Jelson’s case, as detailed in paragraphs 77 -81 of the judgement. In summary, Mr Justice Green stated:

- The data submitted by Leicestershire Police did establish that the proposed development would have direct, additional and permanent demands upon policing services of all kinds.
- It was unreasonable to have expected the Inspector to undertake a more detailed analysis of the submissions from Leicestershire Police than she had done.
- The request made by Leicestershire Police was clear, with the continuous requested properly allocated to specific projects.
- The police evidence comprehensively demonstrated and evidenced the impact caused by the development and why the infrastructure types (and contributions) identified would mitigate this.
- In view of the above, the Inspector could have made no other reasonable choice but to award the requested Section 106 contributions to Leicestershire Police.

The case for developer contributions towards policing was tested prior to the Jelson case in The Police and Crime Commissioner for Leicestershire) vs Blaby Council and Hallam Land (and other developers). Mr Justice Foskett made some obiter observations in the case that are relevant and applicable to the principle of contributions towards policing infrastructure:

61. I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble about a minor factor. Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the “consumer view” of the issue. The providers of the service (namely,
the Claimant) have statutory responsibilities to carry out and, as the witness state of the Chief Constable makes clear, that itself can be a difficult objective to achieve in these financially difficult time. Although the sums at stake for the police contributions will be small in comparison to the huge sums that will be required to complete the development, the sums are large from the point of view of the police.

62. I am inclined to the view that if a survey of local opinion were taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area: lawlessness in one area can have effects in another nearby area.

Sussex and Surrey Police have adopted the same methodology considered in these High Court decisions which uses a detailed assessment of existing resources to determine our predicted infrastructure requirements. These judgments confirm the reasonableness of Surrey Police seeking infrastructure contributions from new major developments to mitigate the negative impacts they cause. This view has been supported by the Secretary of State and Planning Inspectorate on numerous occasions which are included as Appendix 1.

Surrey Police would also like to draw the Council’s attention in particular to the following comments of the Inspector in the Land at Melton Road Appeal (APP/X2410/A/12/2173673) as they are particularly resonant:

'It seems to me that the introduction of additional population and property to an area must have an impact on policing, in the same way as it must on education and library services, for example. Moreover, it also seems to me that the twelfth core planning principle of the Framework, that planning should... “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs”, can only be served if policing is adequate to the additional burdens imposed upon it on the same way as any other public service.

The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decision, according to paragraph 69 should aim to achieve places which promote, inter alia, “safe and accessible environmental where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.”

Adequate policing is so fundamental to the concept of sustainable communities that I can see no reason, in principle, why it should be excluded for the purview of S106 financial contributions, subject to the relevant tests applicable to other public services. There is no reason, it seems to me why police equipment and other items of capital expenditure necessitated by additional development should not be funded, alongside, for example additional classrooms and stock and equipment for libraries”.

Without direct recognition to policing infrastructure Surrey Police consider policy ID1 of the emerging Local Plan would be inconsistent with paragraphs 17, 58, 69, 70, 156, 162, 177 and 186 of the National Planning Policy Framework (NPPF) and the recent judgement concerning policing between Jelson Limited vs Secretary of State for Communities and Local Government and Hinkley and Bosworth Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Appendix 1 - Examples of Appeal Decisions Supporting Police Contributions.pdf (262 KB)
- Appendix 2 - November 2016 High Court Decision.pdf (401 KB)
- Appendix 4 - 17-07-13 DL_IR_Fontwell_Avenue_Arun_3143095 (002).pdf (1.0 MB)
- Appendix 3 - Leicestershire Police vs Blaby DC.pdf (125 KB)

Comment ID: pslp171/3404  Respondent: 17634625 / Megan Riley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support building more homes in Guildford. Reducing the number of homes in the local plan means we will continue to suffer the ill effects of a shortage of good quality housing for decades to come. We must fix our housing crisis by building more homes urgently.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID:  SQLP16/1419  
Respondent:  17969537 / N Giles Ltd (Sir or Madam)  
Agent:  Vail Williams LLP (Jane Terry)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

For the Plan to comply with the test of soundness it must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

We do not consider the Plan will be effective in delivering the required housing growth in line with the needs of the Borough. This is because:

- There is over reliance of very large strategic sites;
- Effective joint working has not been demonstrated with neighbouring authorities on cross boundary strategic priorities including the need for Guildford to deliver additional housing where those authorities are more heavily constrained;

We do not consider the Plan to be justified because of flaws in the Green Belt and Countryside Study and which has consequently resulted in the sub-optimum adjustment of the Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/1420  
Respondent:  17969537 / N Giles Ltd (Sir or Madam)  
Agent:  Vail Williams LLP (Jane Terry)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is not clear how the Duty to Cooperate has identified any unmet needs arising from neighbouring constrained authorities such as Waverley Borough Council and as such it cannot be concluded that the Duty to Cooperate has been complied with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  SQLP16/1421  Respondent:  17969537 / N Giles Ltd (Sir or Madam)  Agent:  Vail Williams LLP (Jane Terry)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

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In order that the most effective and efficient use of available land is made within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  SQLP16/1422  Respondent:  17969537 / N Giles Ltd (Sir or Madam)  Agent:  Vail Williams LLP (Jane Terry)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No. Please see attached Statement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  RepForm - GBC Proposed Local Plan Submission - Beech Lane - 2016 07.pdf (539 KB)

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Comment ID:  pslp173/407  Respondent:  17976417 / Thakeham Homes (Sir or Madam)  Agent:  Vail Williams LLP (J Lacey)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Transport - Local Road Network

5.1 LRN22 East Horsley and West Horsley traffic management and environmental improvement scheme.

5.2 **Support** is given to the infrastructure improvement, however we **Object** to the timeframe if this leads to a delay in the delivery of much needed housing on sites such as A38 that could be delivered early in the local plan process as a result of waiting for the ‘…£1m Developer Funds’ as per the changed text.

Green Infrastructure - SANG

5.3 Manor Farm, Horsley, policy A38 includes a bespoke SANG (as outlined in requirement (4) of the policy) – SANG9 (Bespoke Suitable Alternative Natural Green Space (SANG) Bens Wood, West Horsley. We **SUPPORT** the SANG provision and it being ‘Developer Funded’.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>pslp173/408</th>
<th>Respondent:</th>
<th>17976417 / Thakeham Homes (Sir or Madam)</th>
<th>Agent:</th>
<th>Vail Williams LLP (J Lacey)</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base</td>
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Air Quality Assessment

6.1 This document considers the potential effect of the growth proposed in the Local Plan on air quality. Specifically in relation to the North East of the Borough, the report concludes that changes in traffic flows will not lead to an exceedance of the air quality objective set out in DMRB Guidance (Highways Agency, 2007). It is therefore confirmed that Air Quality is not a prohibiting factor in bringing forward development in this area. Nevertheless, the report recommends that the findings of the air quality review undertaken to inform the Draft Local Plan should be confirmed by individual developments as part of the planning application process. This precautionary approach which ensures that these issues will be considered and addressed at the detailed design stage is supported.

Local Housing Needs Surveys

6.2 This document confirms at page 342 that ‘There are currently Local Housing Needs Surveys for…West Horsley’. We support the preparation of the updated local housing need study, however, we reserve the right to comment on the outcome detail in due course and as part of any examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: pslp172/3127  Respondent: 17976417 / Thakeham Homes (Sir or Madam)  Agent: Vail Williams LLP (J Lacey)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.1 The schedule of sites at page 143 of the Submission Local Plan indicates a change to the quantum of development proposed although the allocation remains at ‘approximately 135 homes’ as worded.

2.2 Objection is made regarding the overall quantum of development proposed within the local plan (as noted within the housing section above) and given the overall change we believe the quantum of housing suggested within Policy A38 could be augmented further by adding ‘for a minimum of 135 homes…’.

2.3 This would reflect Criterion m) of Policy D4 reflecting the need to make most effective use of available land; it would contribute towards the overall shortfall in supply indicated in the first five years of the Plan; it would contribute towards reinstating the Boroughs objectively assessed housing need to that required through the 2015 SHMA; and it would contribute towards the Borough’s Duty to Cooperate with its neighbouring authorities in meeting the otherwise unmet needs across the HMA.

2.4 The approach to remove ‘maximum or an approximate number’ and provide certainty as a ‘minimum’ has been highlighted through discussions at the Waverley Examination at the end of June 2017 (as Counsel for Guildford Borough Council would confirm). Further, the policy as currently drafted implies a cap on the quantum of development considered acceptable and in this respect does not comply with the spirit of the NPPF which seeks to promote housing growth. Indeed one of the Core Planning Principles at paragraph 17 of the NPPF states that planning should:

‘Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’

2.5 Therefore a revision to the drafting to either ‘for a minimum’ or ‘at least’ 135 homes is suggested.

2.6 We Object to the amended to the allocation which states “…including some self-build and custom house building plots”. The Government has indicated a commitment to self-build and custom house building plots but have not yet issued policy in relation to the initiative. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance. We therefore object to the inclusion of this clause as this stage as being premature and pre-empting confirmation of the Government’s future policy.

2.7 Under the ‘Key Considerations’ section of Policy A38, the considerations section should be positively worded to ‘design out’ those aspects through good planning and design. We also recommend the inclusion at point (4) to the specific SANG – ‘SANG9 (Bespoke Suitable Alternative Natural Green Space (SANG) Bens Wood, West Horsley.’
6.1 This policy sets out the Council’s aspirations for sustainable features to be integrated into all development in the Borough, new or existing. To this end, the Council requires that all development must be supported by a Sustainability Statement which details how the proposal will perform in terms of efficiency and embodied carbon emissions. This by itself is a further onerous requirement set by the Council and it is unclear why such measures for new build are necessary, when standards set as part of evolving Building Regulations (Part L).

6.2 This policy also introduces the requirement for connection to Combined Heat and Power (CHP) networks, where achievable. In addition the Policy seeks to achieve a reduction in carbon emissions through renewable and low carbon technologies. As part of the latest consultation document, the proposed level of renewable development sought has been increased from 15% to 20%. RPS considers that this matter has not been properly considered to date and the latest amendment only worsens the position in relation to the soundness of the policy. One of the principal soundness issues the policy faces is the consideration of viability.

6.3 The Council’s October 2016 Local Plan and Viability Study (LPVS) recognises that this policy has cost implications (Table 3.1 refers), however it has failed to capture the extent of the costs associated with development. The LPVS indicates at Paragraph 5.3.32 that the Council was considering a 15% reduction in carbon reduction, is similar to the ‘Merton Rule’, adopted by Merton Council in 2003, which seeks 10% on-site renewable provision. As a result of this, a build cost of 2.5% has been factored into the viability assumptions.

6.4 The actual position is somewhat different, as the Council is not seeking a carbon reduction, but expresses a preference for low carbon technologies. The LPVS is therefore incorrect in assuming that the Council’s previous 15% figure was akin to the Merton Rule, indeed it was 5% higher, meaning that the Council’s modelling of this in the LPVS was incorrect. The new consultation document takes this further still, requiring 20% low carbon/renewable sources should be provided with new development. There is no policy basis for this figure and the financial implications of this have not been tested by the Council to even see whether this is a viable proposition.

6.5 Merton Council no longer apply the Merton Rule, acknowledging that this planning policy has since been superseded by changes to building regulations, which seek to implement a fabric first approach to a reduction in carbon emissions, as indicated in the Council’s Energy Hierarchy. Building Regulations are constantly evolving to take into account new approaches to carbon reduction. It is therefore considered that this policy as currently drafted is not soundly based in evidence and Government policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

**Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

4.1 The aspiration for high quality design as set out in the criteria at Policy D4 is generally supported. In particular criteria, which seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context. Criteria m) deals with the effect of development on the amenity enjoyed by the occupants of buildings. Whilst this general statement is supported, it is important that conclusions are not drawn disproportionately at the outline stage, rather that due consideration is made at the detailed planning stage.

4.2 Therefore it is considered that an amendment to this criterion should be made to clarify the role of the detailed design stage.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

3.1 We OBJECT to H1 criteria (9) and (10) ‘Self-build and custom build’ for the reasons outlined above. Whilst a Custom Housebuilding Register is kept, the principle of Self-Build and custom housebuilding is not a matter outlined in detail within central government guidance or policy. This will in effect sterilise land impacts on the overall deliverability of much needed housing on sites.

3.2 As stated within Section 2 above in the context of Site Allocation A38, Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance. We therefore object to the inclusion of the self-building and custom housebuilding element to policy H2 as it is premature and pre-empting confirmation of the Government’s future policy.

We also believe that an 18 month period to make the plots available and marketed also lacks central Government policy or guidance to endorse the approach.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Accessible Homes

4.1 As part of the latest consultation document, the Council has included a new policy requirement for at least 10% of developments of 25 or more to meet the requirements of Building Regulations M4(2). Building Regulations M4(2) is an optional requirement which relates to the access and use of buildings, particularly those with reduced mobility and wheelchairs.

4.2 Creating an adaptable dwelling stock is not a bad idea, however it is one which the Council has given very little consideration and the thresholds proposed do not appear to be grounded in evidence. Clearly any requirements above the national standards will involve a different approach and one which may involve adopting non-standardised measures. This matter has not been included within the Council’s viability testing and there is no evidence to justify the figure of 10% proposed by the Council.

Self-build and Custom Housing

4.3 In addition to this requirement, the Council has also introduced a further new requirement as part of this policy relating to the provision of self-build housing. Introduced through the Self-build and Custom Housebuilding Act 2015, there is a clear mandate for Local Authorities to understand the scale and requirement for self-build properties to provide evidence for the demand for this type of housing. The PPG proposes that this is done through the compilation of a Self-build register.

4.4 As a policy response to this, the Council proposes that on development sites of 100 or more, 5% of the total homes are made available for self-build properties. Presently, the Council has not provided any evidence of the total need for self-build properties in the Borough and as such, it is currently unknown how much provision is needed for the purposes of the Local Plan. As the evidence base for the self-build register is not available, the Council’s justifications for this policy are unclear and unfounded. In the absence of credible evidence, the policy needs to be made more flexible in order for self-build to be included in the plan, though not to the prescriptive extent expressed in the current policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.5 RPS does not dispute the fact that there is a considerable shortfall in affordable housing provision in the Borough. The latest 2017 SHMA indicates (paragraph 8.12) that to meet estimated affordable housing need (at the rate of 40%), around 1,300 dwellings per annum would be required. This is a significant amount that can only be met through planning for growth beyond the current Local Plan targets.

4.6 The current wording of the policy seeks to achieve a minimum of 40% affordable housing, suggesting that the rate sought may indeed be higher. The Council’s viability has appraised the affordable housing threshold of 40%, but has not tested any higher scenarios and as such, the Council is unjustified in seeking higher requirements.

4.7 RPS does not agree with the Council’s current evidence as part of this policy and would expect that this is given further consideration prior to submission, to ensure that the evidence is proportionate and takes into account local data surrounding including land values, construction costs and the implications of the Community Infrastructure Levy (CIL) charging schedule.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2097  **Respondent:** 17976417 / Thakeham Homes (Sir or Madam)  **Agent:** RPS Planning & Development (Cameron Austin-Fell BA)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

5.30 In relation to the proposed policy, RPS considers that the Council needs to offer clearer advice in terms of how it responds to the necessary allowance for climate change. The current wording, which indicates that an ‘appropriate allowance’ should be made, is not an appropriate policy mechanism to give this certainty of delivery. The Council should instead offer greater certainty about what is required, justified by evidence and policy guidance.

5.31 As part of the appended documents supporting the Fairlands Delivery Document it has been demonstrated that there is acceptable attenuation storage for a 1 in 100 flood event, and also includes a 40% climate change return period. This responds to the evidence base for the site, which took into account the total potential change in rainfall in 2080.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2098  **Respondent:** 17976417 / Thakeham Homes (Sir or Madam)  **Agent:** RPS Planning & Development (Cameron Austin-Fell BA)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
5.32 This policy sets out the Council’s approach in relation to the protection of the Thames Basin Heaths Special Protection Area (SPA). The policy has recently introduced some further new text which indicates that where new developments are proposed in the zone of influence (between 400m and 5km linear distance), avoidance and mitigation measures must be delivered prior to occupation of new dwellings. In this context the Council needs to clarify in the text, as Waverley Borough Council have, that the term ‘avoidance’ relates to the provision or contribution towards Suitable Alternative Natural Greenspace (SANG) sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1441  Respondent: 17976417 / Thakeham Homes (Sir or Madam) Agent: Vail Williams LLP (J Lacey)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. Housing

1.1 Reference should also be made to the HBF representation which, as members (both Vail Williams and Thakeham Homes), we support. Importantly, the evidence base underpinning the Council’s OAN has recently been updated as part of the March 2017 West Surrey Strategic Housing Market Assessment: Guildford Addendum (2017 SHMA). This is proposed to replace the findings of the 2015 West Surrey Strategic Housing Market Assessment (2015 SHMA).

1.2 It is considered that there are a number of issues with the Council’s OAN and the evidence base underpinning it. These are separated into the various components of OAN below. RPS are also acting on behalf of Thakeham Homes in the Borough. These representations make reference to observations made by RPS and detail a number of issues with the Council’s OAN including the evidence base underpinning it. These are separated into the various components of OAN below.

Five year Supply of Housing Land

1.3 The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan should be declared unsound.

Soundness

1.4 As a consequence of the discussions below, objection is made to the Plan’s ‘Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduce the delivery of homes from 13,860 to 12,426 in the period to 2034.
1.5 The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly, the Plan should be found unsound. However, this is based upon the published information and our observations from the recent Examination by an Inspector into the Waverley Borough Local Plan, which is an authority within the joint SHMA area affecting Guildford Borough.

1.6 There are a number of concerns with the Council’s OAN and the evidence base underpinning it including unmet housing need, balancing housing and jobs and market signals and affordability. Our clients have commissioned experts in the field to look at the detail which is referred too within separate representations, however we may wish to address the Inspector at Examination in relation OAN.

Objective Assessed Housing Need

1.7 The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

1.8 The SHMA calculated an expected employment growth of 13,860 in the borough 2013-2033 giving rise to 693dpa; this figure was then adjusted to include:

i. Affordability pressures - Both across the HMA and in Guildford Borough, affordability has long been recognised. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year with a significant proportion of these being younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to 2001 level arising in a need of 668 dpa;

ii. Student growth - Anticipated growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation; and

iii. The Guildford Addendum Report 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

1.9 The Council have also departed from the plan period for the wider Housing Market Area (HMA). In order to maintain consistency with the HMA and ensure alignment of the plan period in West Surrey, it is recommended that the base date of 2013 is reinstated, to operate until 2033 rather than 2015-2034 in the current draft.

Unmet Housing Need

1.10 The Council’s evidence base makes no reference to unmet needs arising from outside the Borough, instead taking the view that the Borough will only address its own need. This notion was recently tested through the Waverley Local Plan Examination, where there are clear parallels for the role of Guildford to take further need from outside the Borough.

1.11 As part of the Waverley Local Plan Examination, the extent of Woking’s unmet need was brought under scrutiny, as it became clear that there were no mechanisms in place to address housing shortfalls arising from the Borough.

Duty to Cooperate

1.12 It is of some concern that this Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. It was suggested that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently, there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. The Waverley Local Plan Examination determined that there was a shortfall of available housing supply in Woking which was not able to be met though the plan period. The Waverley Local Plan Examination hearings determined that the extent of this shortfall equated 166dpa and it was proposed that Waverley accommodated 50% of this (83dpa therefore resulting in an extant shortfall of 83dpa.)
1.13 Importantly, Paragraph 4.1.9a of the Proposed Submission Local Plan states that in relation to the proposed housing requirement of 12,426 over plan period to 2034, ‘this is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period’. This therefore indicates that Guildford Borough may have capacity to accommodate the unmet needs of Woking Borough alongside Waverley Borough.

1.14 Neither Waverley nor Guildford appear to be taking their Duty to Cooperate seriously in this respect, a concern demonstrated by the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. The recent Waverley Examination suggested that they will be accommodating half the unmet need of Woking. Guildford has the ability to accommodate further dwellings including accommodation of some of the needs of Woking Borough Council. As a result of the debate at the Waverley Examination, Guildford should proactively plan for the housing need.

1.15 Much like Waverley, it is clear that Guildford also has links to the London Boroughs which may warrant consideration of further unmet needs. Figure 4 of the 2017 SHMA identifies that net inward migration from the London Boroughs has been consistently positive for the past 15 years.

Market Signals and Affordability

1.16 The 2017 SHMA does not properly reflect the affordability constraints in the Borough and responds to this indicator through an insufficient uplift to the OAN. The following paragraphs have been put together with input from RPS on behalf of Thakeham Homes:

1.17 The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers). What this is, in effect, is an adjustment to the 2014-based household formation rates in the 25-34 age cohort. Whilst this is a necessary adjustment to make to compensate for embedded suppression in the ONS household projections as indicated above, this is not an appropriate adjustment for the purposes of addressing affordability issues in the Borough.

1.18 The 9% increase on the employment-led OAN is a tokenistic gesture and gives no certainty that affordability issues will be addressed in the Borough. The adjustment proposed by the Council seeks to address affordability associated with suppression of people aged 25-34, however affordability is not limited to these groups alone, and exists across the board in Guildford.

1.19 The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.

1.20 The uplift of 9% is not grounded in evidence that this uplift this will address affordability issues and as identified above, the uplift is limited only to a single age group.

1.21 One way in which this could be addressed is through consideration of the Local Plans Expert Group (LPEG) methodology, proposed as part of their recommendations to Government in their March 2016 report. This includes a sliding scale of market signals adjustments, based on the severity of housing affordability, through consideration of LQ house prices and LQ house rents.

1.22 Using this methodology, the Council exhibits significant affordability issues and would fall under the category for 25% market signals uplifts. Given the severity of the affordability imbalance in the Borough, it is considered that the 25% uplift should be the minimum that is applied. This is considerably higher than the 9% figure proposed by the SHMA and highlights the shortcomings of the Council’s evidence.

1.23 In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council
would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

**Balancing Housing and Jobs**

1.24 The Council’s demographic trends identify a need for 55dpa, which the Council consider in the context of future job growth. The Council uses a blended jobs forecast (taken from Experian, Cambridge Economics and Oxford Economics) to derive an annual job growth of 0.7%. Applying this to assumptions of economic activity, unemployment and commuting, the Council takes the view that the OAN should increase to 577dpa (+20dpa). RPS does not consider that this is a valid approach to take.

1.25 Data provided by the Office of National Statistics (ONS) provides estimations of workplace job change over previous years. The latest data, covering the years 2000-2015 indicates that there has been an average job growth over this period of 0.9%. This is somewhat higher than the Council’s employment growth forecast of 0.7% and the Council has not justified why it is relying on a jobs growth figure lower than the previous rates of growth.

1.26 It does not appear that the Council has given due regard to past trends and how this could influence future job growth. This needs to be more fully explored before the Council proceed with a jobs-led housing strategy for growth.

Further points of observation and objection are set out below.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2089</th>
<th>Respondent: 17976417 / Thakeham Homes (Sir or Madam)</th>
<th>Agent: RPS Planning &amp; Development (Cameron Austin-Fell BA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</tbody>
</table>

1.1 These representations to the Council’s Further Regulation 19 Local Plan are made by RPS Planning and Development (RPS) on behalf of our client Thakeham Homes Ltd (Thakeham). This site has been previously promoted by the landowner and a submission was made to the Council as part of the July 2016 consultation of the Local Plan.

1.2 In drafting the Local Plan, the Council will be mindful of the requirements of paragraph 182 of the NPPF, which sets out the rigour that the Council must adhere to in order to meet the tests of soundness. This requires that plans are positively prepared, justified, effective and consistent with national policy. RPS has set out a range of issues with the current drafting of the Guildford Local Plan which need to be addressed in order for the plan to be properly justified and effective as a tool to shape growth in the Borough. The Plan does not provide sufficient certainty that the Local Plan is capable of delivering growth which sufficiently boosts the supply of housing, as required by paragraph 47 of the NPPF and has not been prepared positively.

1.3 In particular, RPS has a number of concerns with Guildford Borough Council’s (the Council) current proposed strategy in the current Local Plan and considers that the Council is not presenting an honest appraisal of the level of growth required.
in the Borough. RPS considers that the housing need for the Borough is indeed higher and consequently, there is a need for additional sites to be delivered through the plan period.

1.4 As a response to the shortfall in housing supply, Thakeham proposes Land at Fairlands as a considered and appropriate location for further housing growth. Land at Fairlands was previously included as Safeguarded Land in the 2014 Draft Borough Local Plan, however this has been removed from the current consultation document. RPS considers that the site needs to be reconsidered as a future growth site in the Local Plan, which will assist in addressing shortfalls in the Council’s delivery and also assist in delivering wider benefits to the Guildford area, including a proposed Park and Ride facility.

1.5 The details of this proposed Park and Ride is included within the Fairlands Delivery Document (Appendix 1) which also includes an illustrative masterplan for development and technical studies which support the deliverability of the site. The further supporting technical documents are also included with his submission:

- Air Quality Assessment (Appendix 2.1);
- Desk Based Heritage and Archaeological Assessment (Appendix 2.2);
- Ecological Deliverability Note (Appendix 2.3);
- Landscape, Visual Appraisal and Green Belt Review (Appendix 2.4);
- Noise Risk Assessment (Appendix 2.5);
- Surface Water Drainage Assessment (Appendix 2.6);
- Transport Feasibility Assessment (Appendix 2.7); and
- Utilities and Foul Water Drainage Assessment (Appendix 2.8);

1.6 It is considered that Land at Fairlands is an appropriate location for future growth and is necessary to provide the Council with a greater cache of housing land, deliverable within the plan period of the Guildford Local Plan.

1.7 These representations explore these matters in more detail, along with consideration of other policies in the consultation Local Plan. For ease, the sections of this report mirror the format of the Council’s Regulation 19 consultation document.

2 OBJECTIVES AND VISION

2.1 The Council has set out in its vision a strategy for growth in the Borough. A strategy which should support the necessary requirements for housing and employment across the plan period. As part of the recent changes to the Plan, the Council has amended its plan period from 2013-2033 to 2015-2034.

2.2 Whilst this only includes a reduction of 1 year to the plan period, it is moving away from aligning with the wider Housing Market Area (HMA) which includes Woking and Waverley. The Council has already established through the 2015 Strategic Housing Market Assessment (2015 SHMA) that there are functional housing relationships between the three authorities in West Surrey and, accordingly, the joint study has been undertaken to establish the housing need for these areas.

2.3 What is also known is that Woking is significantly constrained in its ability to meet its own housing need and has requested that Waverley and Guildford consider how they may be able to assist in meeting any shortfalls arising from Woking Borough.

2.4 With a revised plan period, it becomes more difficult to establish what the housing need is across the HMA and the role of Guildford in discharging it’s duties under the Duty to Cooperate in meeting any necessary unmet need. For the sake of consistency across the HMA, it is proposed that the Council revert to the original 2013-2033 plan period, which is better aligned with Waverley and Woking.

3.1 The Council’s current strategy for growth seeks to focus growth towards the most sustainable settlements, including Guildford as the principal location for development. After Guildford, development is proposed to urban areas followed by growth to the villages.

3.2 Though RPS agrees that development should be directed to the largest centres, the proposed strategy is not sufficiently nuanced to allow for growth in sustainable villages within close proximity to Guildford.
3.3 Although the Council has identified locations adjacent to Guildford for proposed allocations, RPS considers that
Fairlands is an appropriate location on the edge of the town, capable of supporting further growth as part of an urban
extension strategy.

3.4 The Council’s own evidence recognises the sustainability of Fairlands as an appropriate location to direct new growth
to. The Guildford Settlement Hierarchy Study (2014) identifies Fairlands as appropriate and capable to support new
development. The consideration of the site as a sustainable location is also mirrored in the Council’s Green Belt and
Countryside Study Vol V (2014) which recognises that the settlement is supported by a number of services and a good
public transport system (paragraph 24.65 refers).

3.5 As part of the Council’s Draft Local Plan (2014), Land at Guildford was included as an appropriate location for
Safeguarded Land, to be removed from the Green Belt in the event that further land was necessary for development. RPS
considers that the Council was correct to identify this land, as a sustainable location, capable of supporting the expansion of
Guildford. As a response to this Thakeham has prepared a Delivery Document for promoted land at Fairlands (Appendix
I), which can deliver up to 550 dwellings in the plan period, along with other sustainability benefits including a SANG and
land for a Park and Ride system.

3.6 Under the current provisions in the plan, Fairlands is included as a Rural Local Centre, however this settlement is
strategically placed to accommodate further growth at Guildford and should be considered as an urban area for the purposes
of the Local Plan.

3.7 Guildford is constrained to the south of the town by the Surrey Hills Area of Natural Outstanding Beauty (AONB)
which restricts how the town can grow. The Council is already proposing growth to the east, north and west of Guildford.
In order to provide a balanced mix of sites, Fairlands provides a further location for growth which is within close proximity
to the town along the A323 and is considered to be a sustainable settlement for Green Belt release as part of the Local Plan.

3.8 Accordingly, RPS considers that Fairlands should be recognised as a potential growth location to serve the expansion of
Guildford which should be amended as part of this policy

Objective Assessment of Need for Housing
3.9 One of the more significant changes presented in the submission is the reduction in the Objectively Assessed Need for
Housing (OAN) presented as part of emerging Policy S2.

3.10 This indicates a reduction from 13,860 dwellings to 12,426 dwellings, a reduction of 1,434 dwellings. As previously
noted, one area affecting this is the change in the plan period from 2013-2033 to 2015-2034, which reduces the plan period
by one year. In considering this as an annual requirement, the OAN has now decreased from 693dpa to 654dpa.

3.11 For the reasons outlined in Section 2, RPS does not consider this to be a sound adjustment, as this is a departure from
the plan period for the wider Housing Market Area (HMA). In order to maintain consistency with the HMA and ensure
alignment of the plan period in West Surrey, it is recommended that the base date of 2013 is reinstated, to operate until
2033.

3.12 Importantly, the evidence base underpinning the Council’s OAN has recently been updated as part of the March 2017
West Surrey Strategic Housing Market Assessment: Guildford Addendum (2017 SHMA). This is proposed to replace the
findings of the 2015 West Surrey Strategic Housing Market Assessment (2015 SHMA).

3.13 RPS observes that there are a number of issues with the Council’s OAN and the evidence base underpinning it. These
are separated into the various components of OAN below.

Unmet Housing Need

3.14 The Council’s evidence base makes no reference to unmet needs arising from outside the Borough, instead taking the
view that the Borough will only address its own need. This notion was recently tested through the Waverley Local Plan
Examination, where there are clear parallels for the role of Guildford to take further need from outside the Borough.

3.15 As part of the Waverley Local Plan Examination, the extent of Woking’s unmet need was brought under scrutiny, as it
became clear that there were no mechanisms in place to address housing shortfalls arising from the Borough.
3.16 The Waverley Local Plan Examination determined that there was a shortfall of available housing supply in Woking which was not able to be met though the plan period. The Waverley Local Plan Examination hearings determined that the extent of this shortfall equated 166dpa and it was proposed that Waverley accommodated 50% of this (83dpa). There exists therefore, an extant shortfall of 83dpa and RPS consider that this should first be met in the HMA, through Guildford’s Local Plan.

3.17 Much like Waverley, it is clear that Guildford also has links to the London Boroughs which may warrant consideration of further unmet needs. Figure 4 of the 2017 SHMA identifies that net inward migration from the London Boroughs has been consistently positive for the past 15 years.

3.18 There are clear linkages with Guildford and the London Boroughs, which continue to be net importers of labour from the capital. The Council should endeavour to quantify the strength of this relationship which can be converted into an appropriate figure to assist in meeting unmet needs from the London Boroughs as part of the total housing requirement.

Balancing Housing and Jobs

3.19 The Council’s demographic trends identify a need for 55dpa, which the Council consider in the context of future job growth. The Council uses a blended jobs forecast (taken from Experian, Cambridge Economics and Oxford Economics) to derive an annual job growth of 0.7%. Applying this to assumptions of economic activity, unemployment and commuting, the Council takes the view that the OAN should increase to 577dpa (+20dpa). RPS does not consider that this is a valid approach to take.

3.20 Data provided by the Office of National Statistics (ONS) provides estimations of workplace job change over previous years. The latest data, covering the years 2000-2015 indicates that there has been an average job growth over this period of 0.9%. This is somewhat higher than the Council’s employment growth forecast of 0.7% and the Council has not justified why it is relying on a jobs growth figure lower than the previous rates of growth.

3.21 It does not appear that the Council has given due regard to past trends and how this could influence future job growth. This needs to be more fully explored before the Council proceed with a jobs-led housing strategy for growth.

Market Signals and Affordability

3.22 In RPS’ view, the 2017 SHMA does not properly reflect the affordability constraints in the Borough and responds to this indicator through an insufficient uplift to the OAN.

3.23 Whilst the 2017 SHMA assesses market signals, concluding that an uplift should be applied in terms of housing need, the uplift which has been applied is very low. The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers).

3.24 What this is, in effect, is an adjustment to the 2014-based household formation rates in the 25-34 age cohort. Whilst this is a necessary adjustment to make to compensate for embedded suppression in the ONS household projections as indicated above, this is not an appropriate adjustment for the purposes of addressing affordability issues in the Borough.

3.25 The 9% increase on the employment-led OAN is a tokenistic gesture and gives no certainty that affordability issues will be addressed in the Borough. The adjustment proposed by the Council seeks to address affordability associated with suppression of people aged 25-34, however affordability is not limited to these groups alone, and exists across the board in Guildford.

3.26 The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.
3.27 The uplift of 9% is not grounded in evidence that this uplift will address affordability issues and as identified above, the uplift is limited only to a single age group.

3.28 One way in which this could be addressed is through consideration of the Local Plans Expert Group (LPEG) methodology, proposed as part of their recommendations to Government in their March 2016 report. This includes a sliding scale of market signals adjustments, based on the severity of housing affordability, through consideration of LQ house prices and LQ house rents.

3.29 Using this methodology, the Council exhibits significant affordability issues and would fall under the category for 25% market signals uplifts. Given the severity of the affordability imbalance in the Borough, it is considered that the 25% uplift should be the minimum that is applied. This is considerably higher than the 9% figure proposed by the SHMA and highlights the shortcomings of the Council’s evidence.

3.30 In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

8.1 The summary of supply proposed as part of the Sites chapter in the plan identifies the following locations for growth.

<table>
<thead>
<tr>
<th>Settlement Hierarchy</th>
<th>Proposed Allocations</th>
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<tbody>
<tr>
<td>Guildford Town Centre</td>
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<tr>
<td>Guildford Urban Area</td>
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<tr>
<td>Ash &amp; Tongham</td>
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<td>PDL in the Green Belt</td>
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<td>New Settlement</td>
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<td>Villages</td>
<td>853</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>11,228</strong></td>
</tr>
</tbody>
</table>

8.2 To date, the Council has completed 678 dwellings as part of the plan period 2015-2017, which along with the proposed allocations takes the Council’s total supply to 11,748 dwellings. Even if all of the proposed allocations came forward as expected, this would leave the Council with a shortfall of 678 dwellings (based on an OAN of 12,426), though as indicated by RPS, the actual OAN for the Borough is likely to be far higher, which will only widen the shortfall further.

8.3 The Council’s 2017 Local Area Assessment (2017 LAA) provides a more detailed trajectory on page 8 to indicate when each of the Council’s proposed allocations can be expected to come forward. This table indicates that even when set against a reduced housing target for the next five years, the Council faces a cumulative shortfall in delivery that will not be equalised until 2025/26.

8.4 Notwithstanding a detailed critique of the Council’s proposed supply which RPS reserves the position to do, this highlights a lack of resilience in the Council’s supply of housing. It is therefore necessary for the Council to identify additional sites in order to create a more flexible supply of housing and to this effect, RPS considers that Land at Fairlands is wholly appropriate in order to achieve this aim.

8.5 The full details of the site and the opportunities for development is included as part of the appended Delivery Document (Appendix 1), which highlights the sustainability of the site and the need to remove the land from the Green Belt as part of the Local Plan process. Further information on the site and proposed development is included below.

Land at Fairlands
8.6 Fairlands is recognised as a sustainable location for growth in the Council’s 2014 Settlement Hierarchy Study and shares strong ties with Guildford town to the south east. Fairlands is a settlement with a number of existing services including a primary school, GP and pharmacy, community centre and local retail opportunities. The settlement is served by a number of regular bus services which operate between Guildford and Aldershot which assists in demonstrating the sustainability credentials of the village as a satellite settlement to Guildford.

8.7 Thakeham is promoting land west of Fairlands as a logical location for future development, which can assist in meeting shortfalls in housing delivery in the Borough. This site has been previously promoted through the Local Plan process through submissions made by the landowners, and Thakeham has taken over promotion of the site. Land west of Fairlands has been included in previous stages of the plan process, which was identified as a suitable location in the Council’s 2013 Green Belt study and subsequently identified as Safeguarded Land in the 2013 Draft Local Plan.

8.8 Like most of the settlements in Guildford Borough, Fairlands is enveloped by Green Belt, which has historically constrained development in the village. Thakeham has commissioned a Landscape and Visual Assessment of the site (Appendix 2.4), which has considered the potential landscape baseline, impacts of development and the consistency of the site with the purposes of the Green Belt. The Landscape and Visual Assessment concludes that the site makes only limited contribution to the purposes of the Green Belt and could be developed without eroding the intended purposes of the Green Belt.

8.9 The Landscape and Visual Assessment, along with a number of other technical studies, has informed the production of an Illustrative Masterplan for the site, which indicates how the development could come forward in a way which reflects the local surroundings and provides enhancements to the area.

8.10 Informed by an understanding of the capacity of the site, Thakeham proposes that the site can deliver up to 550 dwellings adjacent to the existing settlement of Fairlands. The site can be brought forward by Thakeham as part of a wider comprehensive development in the village. Thakeham has commissioned a Landscape and Visual Assessment of the site (Appendix 2.4), which has considered the potential landscape baseline, impacts of development and the consistency of the site with the purposes of the Green Belt. The Landscape and Visual Assessment concludes that the site makes only limited contribution to the purposes of the Green Belt and could be developed without eroding the intended purposes of the Green Belt.

8.11 The illustrative masterplan demonstrates how the site can be delivered in a comprehensive way. Thakeham considers that the site can be delivered in line with the Guildford Local Plan to support shortfalls in housing delivery and deliver sustainable transport enhancements. This also involves the creation of a new 3-arm roundabout onto the A323 which will provide the necessary capacity to serve the development.

8.12 To achieve this, Guildford will need to use the Local Plan to release the site from the Green Belt and, as demonstrated in Section 5, the site only makes a limited contribution to the purposes of the Green Belt. The site is considered to be wholly deliverable within the timeframes of the Local Plan and Thakeham estimate that, subject to Green Belt release, the site can start delivering the first dwellings in 2022.

8.13 The Council has not made an appropriate assessment of land to the west of Fairlands as a realistic option for housing delivery of the housing strategy for Guildford. As indicated, Thakeham considers that the site should be reconsidered in the context of the housing shortfall in the Borough and should be included as an further allocation in the Local Plan strategy for Guildford.

(Please refer to Uploaded version)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- **27413 Land West of Fairlands L.VA GBR 20170720a Combined_Part4.pdf** (2.6 MB)
- **Appendix 2.3 Ecological Deliverability.pdf** (3.3 MB)
- **27413 Land West of Fairlands L.VA GBR 20170720a Combined_Part3.pdf** (10.9 MB)
- **Appendix 2.7 Transport Feasibility Assessment.pdf** (2.5 MB)
| Comment ID: | pslp171/3523 | Respondent: | 17979553 / Land to the East of White Lane, Ash (Sir or Madam) |
| Agent: | Vortal Properties Ltd (Robert Symons) |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Key facts |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Vortal Properties are broadly supportive of the changes to the content of the plan and are specifically supportive to the changes made to Site A28 - Land east of White Lane, Ash Green

Key Diagram and Proposals Map (Paragraph 1.15)

In relation to Site A28 a larger area of land is available for release which should be included in the allocation (see response to PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2017 - PART 2: SITES) and set within the defined Ash Urban Area on the Proposals Map, as well as its removal from the proposed area of greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/2708 | Respondent: | 17979553 / Land to the East of White Lane, Ash (Sir or Madam) |
| Agent: | Vortal Properties Ltd (Robert Symons) |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A28 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Vortal Properties support the inclusion of Site A28 within the extended Ash Urban area and the update to the site reference as ‘Land to the east of White Lane, Ash’.

Also supported is the increase gross area of the allocation to 2.85 hectares, taking into account the additional land west of the site up to highways land, and the Ancient Woodland to the south, to form a landscape buffer and facilitate access and visibility.

In relation to Site A28 a larger area of land is available for release to the east of the site that would be suitable for an area of Open Space and assist with meeting the identified opportunity for ‘green corridors and linkages to habitats outside of the site.’ The boundary would need to extend so the additional land is set within the defined Urban Ash area and removed from the greenbelt.

The additional land (totalling 0.28 hectares in size) is outlined below in blue increasing the overall size of the allocation to 3.13 hectares.

[Map]

The inclusion of wording for the allocation at Site A28 to be suitable for both homes (C3) and accommodation for older people (C2) is supported to allow flexibility for development of the site.

[Text of attachment reproduced below]

Vortal Properties support the allocation of Site A28 for approximately 62 new homes, and the following changes:

- Change in the site name to ‘Land to the east of White Lane, Ash’
- Site allocation area increased to 2.85 hectares to include land to the west and south to form a landscape buffer and facilitate access and visibility
- The acknowledgement of the allocation to cater for ‘a mix of homes (C3) and accommodation for older people (C2)’

However, we recommend that:

- The identified site area is enlarged to include the additional land to the east bring the size of the allocation to 3.13 hectares
- The land to the east is removed from the greenbelt and included within the urban area boundary for Ash and Tongham

Inclusion of additional land to the east of the site within allocation A28 (highlighted blue)

Attached documents:  Vortal Properties Reps - Site A28 GBC Local Plan Revisions.pdf (673 KB)
Vortal Properties are broadly supportive of the changes to the content of the plan and are specifically supportive to the changes made to Site A28 - Land east of White Lane, Ash Green Key Diagram and Proposals Map (Paragraph 1.15) In relation to Site A28 a larger area of land is available for release which should be included in the allocation (see response to PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2017 - PART 2: SITES) and set within the defined Ash Urban Area on the Proposals Map, as well as its removal from the proposed area of greenbelt.

Spatial Vision

The Plan continues to rely heavily on large strategic releases, most notably from the changes in delivery of housing, which is now heavily weighted towards the end of the plan. Emphasis, in the short term, should be focused on the delivery of smaller sites, including land at Ash and Tongham (Site A28) which will not require large infrastructure delivery, as well as assisting Guildford meet its identified shortfall in 5-year land supply.

Vortal Properties role as development partner of Site A28 wish to reserve the right to attend the Examination in order to clarify any elements relating to the site allocation and/or the site capacity, appropriate use and/or the implications of any plan policies for the delivery of the allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1170  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changing of the wording of point (2) from ‘must’, to ‘should’ allows the required flexibility for each development to be considered on a case by case basis.

The inclusion of 4.5.8a should include wording to ensure the viability of a development is not hampered, or is considered within any viability argument over deliver of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1171  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst in principle the increased carbon reduction requirement from 15 per cent to 20 per cent is acceptable, the inclusion of the wording in 4.5.30a ‘the financial viability of the requirements set out in Policy D2 will be considered as part of the planning application process’ is supported to recognise potential viability implications.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1172  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes to Policy D4 are deemed appropriate to reflect housing across the borough and not just the urban areas of Guildford, and Ash and Tongham, and inset villages.

Whilst the inclusion of the wording for high quality design expected in the borough is welcomed, the council should take a balanced view on the enforcement of each individual point, so that they are not to the detriment of the development coming forward. Each site should be considered on a site-by-site basis with various levels of weight attributed to each policy, to ensure the correct design of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1164  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Density

The Council state that sites allocated for housing within the Local Plan will not be permitted if the development result in a net loss of all housing or specialist housing. Planning applications should be considered on its own merits, capacities and site constraints, as developments may have the ability to reduce or increase the amount of deliverable housing. An allocation figure should only be considered as an approximant figure until further technical studies are undertaken, in line with an up to date delivery of housing.
The removal of the ‘4.2.8 – Density’ is therefore not supported as each development should be reflective of the local character, context, distinctiveness and the sustainability of the location.

Specialist accommodation housing

Vortal Properties support the inclusion of well-designed specialist forms of accommodation in appropriate sustainable locations such as Site A28.

Accessible accommodation and housing for older people

Whilst the inclusion of 4.2.10 is accepted, the percentage figures required must have the ability to alter both upwards and downwards to reflect figures in the latest SHMA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1165  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the whole Vortal Properties support the changes to Policy H2, specifically including:

- the removal of the wording in (3) ‘Developers will be expected to provide land for affordable homes at nil value,’ which should form part of the viability of the development
- the addition to allow Affordable housing contributions to be provided off-site, or by payment in lieu subject to agreement with the Council

Exceptions to changed wording include:

- Section (2) does not align with National Planning Policy and size of housing threshold to deliver affordable housing
- C2 housing should not be included within the requirement for delivery of affordable housing, due to the specialist nature of the dwelling usage. The wording for consideration on a ‘case-by-case’ basis is not definitive and should be removed altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1167  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst Vortal Properties support that residential developments over 50 dwellings can provide or contribute to appropriate SANG and SAMM measures, and will not be required to undergo Appropriate Assessment, it is deemed definition 4.3.50c is too restrictive on smaller scale developments.

The threshold of ‘over 50 net new residential units’ should be increased to ‘over 100 net new residential units’ so as not to constrain the ability for smaller allocations to come forward.

The removal of C2 development from the zone of influence is recognised in line with other Borough Council Local Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1163  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)  
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Borough wide strategy has reduced the growth targets for housing over the Plan Period to 12,426 new homes.

The delivery of housing over the plan period has been heavily weighted to towards the end of the plan (para 4.1.9a), due to large infrastructure requirements, increasing the likelihood for Guildford Borough to be able to demonstrate a 5-year land supply in the short term.

In the short term, the Council should proactively bring forward identified sites (such as A28) that do not require infrastructure upgrades to help meet local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Weighting of development

Attached documents:

Comment ID: pslp17q/207  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)  
Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Vortal Properties considers that the changes to the Local Plan are thought to be legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/208  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Vortal Properties considers that the changes to the Local Plan are thought to be sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/3524  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)
Agent: Vortal Properties Ltd (Robert Symons)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Spatial Vision

The Plan continues to rely heavily on large strategic releases, most notably from the changes in delivery of housing, which is now heavily weighted towards the end of the plan.
Emphasis, in the short term, should be focused on the delivery of smaller sites, including land at Ash and Tongham (Site A28) which will not require large infrastructure delivery, as well as assisting Guildford meet its identified shortfall in 5-year land supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1194  Respondent: 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam)  
Agent: MADDOX (Matt Hill)  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A24  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Policy A24: Land Allocation - Slyfield Area Regeneration Project, Guildford  

We support the allocation of land of land within the Slyfield regeneration area for mixed use redevelopment, including the provision of 1,500 homes. The policy states that 1,000 homes will be delivered within the plan period with the additional 500 homes to follow thereafter.

We consider the site capable of delivering the full residential capacity identified for the site within the plan period. However, we do not object to the policy as currently worded as we note that the housing delivery will be re-assessed as part of any Local Plan review which, as set out within the Planning Practice Guidance, is recommended to take place five years after the adoption of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/236  Respondent: 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam)  
Agent: MADDOX (Matt Hill)  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
Proposed Policy H2: Affordable Homes

Proposed policy H2 sets out that the Council will work with registered providers, developers and landowners to increase the number of affordable homes in the borough to assist in meeting the identified needs. As a result of this, the Council is seeking the provision of at least 40 per cent of affordable homes on sites providing five or more homes, or where they are greater than 0.17ha. In addition, policy H2 sets out that affordable contributions may be provided off-site, or by payment in lieu where the Council agrees that on site provision and management would be impractical.

Within the subtext of proposed policy H2, reference is made to viability. The sub text outlines that in considering viability, there may be some circumstances where abnormal costs would make the scheme unviable to deliver. In such circumstances, developers will need to demonstrate that providing the amount of affordable housing required by the policy would not be economically viable and as such, the Council may consider varying the tenure mix or reducing the overall number of affordable homes to assist in delivering the scheme.

The requirement to provide 40 per cent affordable homes on scheme of over 5 dwellings or 0.17ha in size, as sought through proposed policy H2, is supported in principle. However, although the subtext of policy H2 makes reference to the viability testing which we support, no specific reference is contained within the policy itself.

To ensure the policy fully complies with national planning policy and guidance, it is considered pertinent to provide direct reference to viability testing within the wording of policy H2 so that that 40 per cent of homes on qualifying sites will be sought for affordable housing, subject to the necessary viability testing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/237  Respondent: 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam)
Agent: MADDOX (Matt Hill)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary, we support the preparation of the Local Plan and the principle of both policies H2 and A24 positively. However, we consider policy H2 (affordable housing) can be enhanced further in order to conform with national planning policy and guidance, assist forthcoming development in the borough and boost housing land supply.

Thank you for the opportunity to respond to the Local Plan Proposed Submission Consultation. We hope these comments are of assistance and would be grateful for confirmation that they have been considered as part of this consultation. We also confirm that we would like to be involved in the future stages of the Local Plan preparation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp17q/33  **Respondent:** 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam))  
**Agent:** MADDOX (Matt Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions I-7 of the questionnaire):** ()

We are of the view that the Plan meets the tests for legal compliance as set out under section 20(5)(a) of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and County Planning (Local Planning) (England) Regulations 2012.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp17q/35  **Respondent:** 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam))  
**Agent:** MADDOX (Matt Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions I-7 of the questionnaire):** ()

With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole has complied with the Duty to cooperate?

Local planning authorities have a duty to co-operate on strategic planning issues that cross authority boundaries as set out within the Planning and Compulsory Purchase Act 2004 (as amended) and NPPF. The failure to demonstrate compliance with the duty to co-operate would result in the plan not being legally compliant.

The Council’s Topic Paper, Duty to Cooperate, which accompanies the Proposed Submission Local Plan, indicates that the Council has been in discussions with neighbouring authorities as part of the preparation of the Plan. To ensure compliance with the Duty to Cooperate, we recommend that the Council continue to co-ordinate with neighbouring authorities in the delivery of this Local Plan and support the continuation of this through the life of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp173/785  **Respondent:** 18148609 / Office of Rail and Road (Paul Wilkinson)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have noted that the Council has identified costs but have you received confirmation for funding for these schemes?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3532  Respondent: 18148609 / Office of Rail and Road (Paul Wilkinson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Station redevelopment etc.

The Council documents refer to development and platform works at Guildford station together with aspirations for new stations within the locality and improvements on both the Portsmouth Direct and North Downs Lines.

There are only two references to Guildford (which are already complete and not the specific schemes listed) in the Enhancements Delivery Plan (EDP) which describes the outputs, scope and milestones for projects and ring fenced funds that Network Rail is committed to deliver in the current control period CP5 (1st April 2014 to 31st March 2019). Network Rail publishes an updated version of the EDP every quarter. ORR holds Network Rail to account for the delivery of the outputs it has committed to the funders of enhancements; in England and Wales this is typically the Department for Transport (DfT).

ORR does not present plans for future railway enhancement projects such as these to Parliament (although some are joint Train Operating Companies and Network Rail funded). The current process involves ORR requesting that DfT produce a High Level Output Statement (HLOS) which states what it requires the railway to achieve as a part of the run up to the next Periodic Review (PR18) http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/price-controls/periodic-review-2018. ORR does not have a role in selecting or, producing appraisals for, candidate schemes.

As a response to our recent consultation on the treatment of enhancements DfT has said that its forthcoming HLOS may not include new enhancements schemes this time, with these being dealt with in a separate process outside of PR18.

The national rail network controlled by Network Rail is divided into a number of routes, Guildford falls under Wessex.

The Wessex Route Study, which sets out the strategic vision for the future of this part of the rail network over the next 30 years and provides options for funders was established in August 2015 contained many of the points raised by the Council, which would have had an opportunity to comment on Network Rail’s plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We have noted the comments you have received back from Network Rail and add the following:

**Land Disposal**

We note that the Guildford Borough plan/strategy includes making use of land owned by Network Rail. One of ORR’s regulatory controls on Network Rail concerns land disposal, our objective being to protect land that may be required for the future development of the railway network and to prevent the disposal of that land against the public interest. Should Network Rail wish to dispose of land it may need to seek our specific consent in order to comply with its network licence. We expect Network Rail to work closely with Guildford Borough Council and all relevant stakeholders in developing its proposals. Details on our regulatory arrangements can be found at: [http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/network-licence/land-disposal-policy](http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/network-licence/land-disposal-policy)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: