Guildford borough Submission Local Plan: strategy and sites - main modifications

Consultation representations: all respondents by respondent ID

December 2018
Submission Local Plan proposed Main Modifications consultation representations

**Comment: MM3 - LPMM18/5420**  
**Respondent:** Safeguard Coaches Ltd (A J Halliday) 8555233  
**Agent:**

Safeguard Coaches has engaged with the Draft Local Plan process from the outset, principally arguing for better a better Town Centre where sustainable transport, especially bus travel, is promoted and for additional infrastructure to enable traffic congestion to be reduced and a more vibrant and pedestrian-friendly Town Centre created.

While we acknowledge that efforts are being made in these regards, including occasional discussions with bus operators, we believe that the new Policy S3 (Delivery of development and regeneration within Guildford Town Centre), which has been added to the Draft Local Plan at HM Inspector’s request, is not adequate or detailed enough given the vital importance of the Town Centre and its centrality to movement around the Town and its environs.

We fear that, if considered sound as currently written, the Draft Local Plan will fail to achieve the best possible outcome for Guildford and particularly its Town Centre. We have a huge opportunity to plan the Town Centre in a coordinated way with sustainable transport modes at its heart, address the present infrastructure deficit, provide for a larger town in the future and create a place that we and our children can be proud of.

**We urge that far more consideration be given to the planning of the Town Centre and that a far more robust and detailed plan be enshrined in the Local Plan.**

As we believe that significantly more work is required on all these aspects we consider the Plan to be **UNSOUND** at the present time and urge HM Inspector to work with the Council and its stakeholders to address the weaknesses of the Plan for the benefit of Guildford.

**Attached documents:**

**Comment: Other comments - LPMM18/6040**  
**Respondent:** Historic England (Alan Byrne) 8555425  
**Agent:**

**Guildford Local Plan: Strategy and Sites Main Modifications 2018**

I refer to your email of 10 September 2018 requesting comments on the above consultation document.

Historic England is satisfied that the proposed modifications that fall within our purview of the historic environment policy advice are sound and legally compliant, and we have no additional representations to make at this time.

**Attached documents:**

**Comment: MM1 - LPMM18/5227**  
**Respondent:** Guildford Residents Association, EGRA (Ms Amanda Mullarkey) 8556385  
**Agent:**

GRA welcomes this policy amendment.
The reasoned justification text should refer to the new requirement in the revised NPPF para 170 that “planning policies and decisions should contribute to and enhance the natural and local environment”. In a Guildford context, the following subsections are particularly relevant:

(a) “enhancing valued landscapes”…
(b) “recognising the intrinsic character and beauty of the countryside”… and
(d) “minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”…

Attached documents:

**Comment:** MM2 - LPMM18/5228  **Respondent:** Guildford Residents Association, EGRA (Ms Amanda Mullarkey)

8556385  **Agent:**

GRA asks for the Examination to be re-opened so that the implications of the ONS population and household projections can be considered by the Inspector through a fair and transparent process. The Inspector was very clear throughout the Examination, and when he gave his provisional conclusions, that a further hearing on the housing figure may be necessary if the anticipated revised projections were significantly different. Such a change has transpired: the household formation rates in the new projections suggest housing numbers that are 22-23% lower than the previous projections for the same population increase. GRA does not consider Policy paragraph (1) to be soundly based (NPPF para 35 and footnote 19).

• The method for assessing the Objectively Assessed Need (OAN) is not clear and justified in relation to the 2016 ONS population and household projections. Nor was it sound in relation to the previous population and household projections when adjusted for
  o under-recording of students leaving at the end of their studies (as described by expert Neil McDonald in GRA Reg 19 responses and hearing statement, the latter assessment having been reviewed by the ONS) or
  o inconsistent assumptions relating to the housing needed to support economic growth.

• The proposed amount of Green Belt loss cannot be justified by exceptional circumstances in view of the revised OAN for Guildford.

• Additional development in Guildford Green Belt to contribute to unmet need from Woking would be perverse when Guildford is more constrained than Woking (as described in GRA hearing statement) and can no longer be justified in view of the revised OAN for Woking using the standard formula (263) or the Woking housing figure that was approved at Examination.

o The test of exceptional circumstances is not met to justify this development in Guildford Green Belt. It would be inconsistent with sustainable development.

o The Sustainability Appraisal that considered unmet need in the HMA was not founded on a soundly based and up to date Green Belt exceptional circumstances assessment.

o GRA is troubled by the extent to which Woking’s unmet need was treated as a given at the hearings rather than as a figure yet to undergo scrutiny at examination.

o GRA suggests any unmet need estimate should be seen in the context of Woking’s ambitious development plans and potential for redevelopment.
It is not credible, in light of the new housing need evidence, to base assessment of Woking’s unmet need on the 2015 West Surrey Strategic Housing Market Assessment (SHMA).

- The supply in Table S2a is excessive, notwithstanding the need for resilience, being twice the figure of c360 homes a year required to achieve the Inspector’s ambition for economic growth.

- The supply is disproportionate given the context of the exceptional circumstances required to justify Green Belt development.

- The supply has been identified by turning too readily to Green Belt and has not been assembled pursuing a brownfield first approach consistent with the NPPF or the Inspector’s requirement that no stone should have been left unturned in identifying brownfield opportunities.

- The quantum of additional early supply cannot be considered sound in light of the revised OAN. The Sustainability Appraisal relied upon to justify these further Green Belt sites is not soundly based on exceptional circumstances that justify Green Belt loss.

- The distribution of supply across spatial locations in Table S2b is not sound being over reliant on Green Belt sites to the extent it reflects a Green Belt first approach. This is exemplified by the way Green Belt potential development areas, including the three strategic sites, were identified very early without putting comparable effort into brownfield site assembly. This bias has been perpetuated with the recently proposed further Green Belt sites where the justification appears to be that these sites have already been appraised.

- A reduced OAN increases the opportunity to identify and deliver brownfield sites during the life of the Plan and for this regeneration to make a significant contribution to overall need.

- Draft para 4.1.21 already describes that in addition to identifying sites to meet the current OAN, “as part of regeneration efforts, more housing is likely to come forward over the plan”. For the test of exceptional circumstances to be met, these sites should be factored into the spatial locations in Table S2b. The test of exceptional circumstances has not been passed if anticipated regeneration will provide additional homes surplus to OAN.

- There is a strong case for taking out at least one strategic Green Belt site. The revised housing figures make table S2b out of date and in need of re-examination.

GRA notes statements made by the Council since the Examination hearings indicating that it took a decision from the outset to opt for a high housing figure in order to fund infrastructure.

An authority may, of course opt to propose for Examination a housing figure that is higher than the OAN. However, in the case of the Draft Guildford Local Plan, the key issue is that a housing figure greater than the OAN has a bearing on whether exceptional circumstances apply that justify removing land from the Green Belt.

The justification given for Green Belt development has been housing need and developers only fund infrastructure to mitigate the excess demand they create.

GRA submits that a housing requirement of 630 plus 42 for Woking’s unmet need is not sound and does not provide a justification for Green Belt loss on the scale proposed, town cramming or the increased congestion that would arise in a constrained gap town.

Appendix 1 of this response is an assessment by expert Neil McDonald of the IMPLICATIONS OF THE 2016-BASED HOUSING NEED OF GUILDFORD BOROUGH.

Crucially, he calculates that updating his previous estimate of the OAN* (460 homes a year) to reflect the new ONS household projections reduces the figure to 360 homes a year (rounded from 361).

* Derived applying 2014 household formation rates to the 2016 population projections
He also submits that there ought to be similar reduction in the GLHearn figure with 629 potentially reducing to 480-490 homes a year.

He sets out that the main reasons for the differences with GL Hearn, as established in the statement of common ground, are:

- Their cautious view of the proportion of the Guildford population which will be available for work (i.e. economically active), which he believes is simply not compatible with the Inspector’s ambitious view of the future rate of jobs growth.

- GL Hearn’s figures are based on OBR economic activity rates consistent with a jobs growth forecast of 0.23%; those rates are not consistent with the Inspector’s view that planning should be on the basis of jobs growth that is more than 3 times as great at 8%. In contrast, the NMSS analysis is based on Experian forecasts which envisage job growth at a similar rate to that suggested by the Inspector.

- GL Hearn’s insistence that the population projections do not include any student growth at all, despite a growth in the 18-23 population that is much larger than the predicted growth in the number of students living in rented accommodation.

The updated OAN of c360 homes a year to support the Inspector’s ambitious rate of economic growth is not out of step with the OAN of 431 derived using the standard method (noting of course that this Plan is being examined under the previous approach).

We wish to reserve the right to comment in the light of what GBC proposes in response to the new ONS household figures. In the meantime, based on economic need to meet the inspector’s ambitious growth assumptions, economic participation rate assumptions consistent with this, the new household projections and the greater proportion of working age within the local population reducing the need to bring workers in, Neil McDonald identifies that the OAN should be revised to 360.

The current figure in the Draft Plan, of 630+42 extra homes a year, is 75% higher than the number of homes needed to support ambitious economic growth and out of step with both the new ONS figures and the new Government formula.

Para 4.1.9b In the last sentence, the meaning of “the policies which are most important for determining a planning application would not be considered up-to-date” should be redrafted to be intelligible to a non-expert and is too imprecise to reflect policy.

MM2 (2a)
Persisting with a 41,000 sq m allocation of comparison retail floorspace:

- is inconsistent with evidence of retail change that has continued since the hearing
- puts existing retail space, including the High Street, at risk
- denies the potential for other uses and cannot be justified when that land could potentially be allocated for other uses that are currently being directed to Green Belt
- does not respond adequately to the approach advocated by the Inspector of promoting mixed use development in the town centre

**Attached documents:**
NOTE ON THE IMPLICATIONS OF THE 2016-BASED HOUSEHOLD PROJECTIONS ON THE HOUSING NEED OF GUILDFORD BOROUGH

Introduction

1. The Office for National Statistics (ONS) published the 2016-based household projections for local authorities (the ‘2016 Sub-national Household Projections’ -2016 SNHP’) on 20 September 2018. These are the first set of household projections produced by the ONS. Previously the official household projections were produced by the predecessors of the MHCLG. The last set of projections produced by the MHCLG were the 2014-based projections (the ‘2014 SNHP’). The new projections use more recent data and a different methodology. Generally, the new set suggests slower household growth than the 2014 SNHP.

2. There are two main components to an official set of household projections:
   a. A set of population projections. Both MHCLG and the ONS have based their projections on the last available set of ONS sub-national population projections (SNPPs). The 2014 SNHP was based on the 2014 SNPP and the 2016 SNHP on the 2016 SNPP
   b. Projections of household formation rates. To turn a set of population projections into a set of household projections estimates need to be made of how the population will group itself into households i.e. how household formation rates (or, more strictly, household representative rates ‘HRRs’) will change. Both the MHCLG and ONS methods adopt a trend-based approach. The MHCLG approach disaggregated the population by 5-year age groups, sex and marital status whereas the ONS have only use age and sex groups – and a much shorter trend series. The ONS approach produces lower household formation rates and for some authorities, including Guildford, the difference is significant.

3. Prior to the publication of the 2016 SNHP it was common practice to update the 2014 SNHP using later population projections (the 2016 SNPP, possibly updated to reflect the 2017 Mid-year Population Estimates) and the household formation rates from the 2014 SNHP. That approach usually provides a reasonably reliable indication of a forthcoming new set of household projections. However, as the latest household formation rate projections are so different from the 2014-based set, such estimates have generally over-estimated the household growth which the 2016 SNHP has now projected.

What the new projections mean for Guildford

4. It was common ground between GL Hearn (Guildford Borough’s advisors) and NMSS (who have advised the Guildford Residents’ Associations) that:
   a. Updating the 2014 SNHP with the 2016-based population projections suggested a starting point demographic estimate of Guildford’s housing need of around 420 homes a year 2015-34.
   b. Further updating this estimate to reflect the ONS’s 2017 mid-year population estimates (which showed lower population growth than anticipated in the 2016 SNPP) reduced the demographic starting point to around1 400 homes a year.
   c. The jobs growth rate suggested by the Inspector implies a faster population growth (and hence more homes) than suggested by the demographic projections.
   d. There is no need to make a further market signal/affordability adjustment on top of the uplift required to support economic growth.

5. There were, however, large differences between GL Hearn and NMSS about how the number of extra homes needed to support job growth should be estimated: GL Hearn calculated this at 606 homes a year 2015-34 and NMSS at 460 homes a year. The differences are largely concerned with the assumptions made about the proportion of the population that will be in work or seeking work i.e. economic activity rates.
6. GL Hearn and NMSS also differ on whether the above figures will provide adequate accommodation for the expected increase in the number of students living in rented accommodation in Guildford. NMSS believe that it will; GL Hearn believe that an extra 23 homes a year are needed for students. Adjusting the homes for jobs led figures accordingly, the GL Hearn estimate of the number of homes needed each year (the OAN) is 629 (i.e. 606 + 23) whereas the NMSS figure is 460 (i.e. 460 + 0).

7. Full details of the comparison between the NMSS and GL Hearn estimates is set out in the table at Appendix 1, which is taken from a statement of common ground agreed between GL Hearn and NMSS.

8. Note that all of the above numbers are based on the household formation rates (HRRs) from the 2014-based household projections. They are now out of date and need to be revised to reflect the 2016-based household projections.

footnote 1 There were small differences between the exact numbers calculated but these were not material.

9. When the key figures are updated to reflect the 2016-based household formation rate projections:

a. The number of homes implied by the unadjusted 2016-based household projections is 325 homes a year (2015-34) – compared with 420 homes a year based on using the 2016 SNPP to update the 2014-based projections. This is a reduction of 23%

b. The NMSS calculation of the number of homes needed to support the Inspector's view of the rate of jobs growth is 361 homes a year – compared with 460 homes a year previously estimated. This is a reduction of 22%.

10. There will be similar reductions in the GL Hearn figures, suggesting a revised estimate in the range 480-490 homes a year 2015-34, although the exact number cannot be calculated without the detailed population age profiles for the GL Hearn projections.

**COMPARISON OF GL HEARN AND NMSS ESTIMATES OF GUILDFORD’S HOUSING NEED**

<table>
<thead>
<tr>
<th>Demographic Need</th>
<th>Headship Assumptions</th>
<th>NMSS Comments</th>
<th>NMSS</th>
<th>Council</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population Growth 2015-34</td>
<td></td>
<td>14,927 (10.3%)</td>
<td>14,927 (10.3%)</td>
<td></td>
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<tr>
<td>2016-based SNPP</td>
<td>2016-based SNPP</td>
<td></td>
<td></td>
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<tr>
<td>Rebasing for 2017 MYEs</td>
<td>NMSS calculation averages two alternative estimates</td>
<td>11,440 (10.0%)</td>
<td>14,891 (10.3%)</td>
<td></td>
</tr>
<tr>
<td>Household Growth</td>
<td>389 pa</td>
<td>396 pa</td>
<td></td>
<td></td>
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<td></td>
<td>Headship Rates from 2014-based</td>
<td>Headship Rates from 2014-based</td>
<td></td>
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<tr>
<td></td>
<td>Household Projections</td>
<td>Household Projections</td>
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<tr>
<td>Vacancy Rate</td>
<td>GL Hearn assumption used</td>
<td>2.3%</td>
<td>2.3%</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>2016 Council Tax data</td>
<td></td>
</tr>
<tr>
<td>Demographic Need</td>
<td>2014 SNHP HRRs</td>
<td>398 dpa</td>
<td>405 dpa</td>
<td></td>
</tr>
<tr>
<td>PRT</td>
<td>Not appropriate</td>
<td></td>
<td>455 dpa</td>
<td></td>
</tr>
<tr>
<td>25-34 return to 2001</td>
<td>Not appropriate</td>
<td></td>
<td>459 dpa</td>
<td></td>
</tr>
<tr>
<td>Economic-led Need</td>
<td>Number of Jobs the Demographic Need Could Support</td>
<td>Not calculated: depends on assumptions which must be mutually consistent (c.f. OBR approach)</td>
<td>9,612</td>
<td></td>
</tr>
<tr>
<td>Assumptions</td>
<td>To deliver 0.8% employment growth requires bullish assumptions on EARs. Experian’s forecasts are the only ones available to NMSS that are remotely consistent with 0.8%</td>
<td>From 2015, OBR no reductions, unemployment reduced 400 (2015-17), constant commuting (Census) and DJ (APS)</td>
<td></td>
<td></td>
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<tr>
<td>Expected Employment Growth</td>
<td>NMSS figure is higher than GL Hearn’s as the Experian jobs estimate for 2015 is higher than GL Hearn’s so 0.8% increase</td>
<td>15,316 jobs</td>
<td>14,600 jobs</td>
<td></td>
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<tr>
<td></td>
<td>produces larger job growth</td>
<td>As in Inspector’s preliminary findings</td>
<td>Experian and GL Hearn estimate of Experian Guildford EARs</td>
<td>OBR 2017 [no decreases]</td>
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<td>-------------------------------</td>
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<tr>
<td>Economic Activity Rates</td>
<td></td>
<td>0.8% pa</td>
<td>Experian and GL Hearn estimate of Experian Guildford EARs</td>
<td>OBR 2017 [no decreases]</td>
</tr>
<tr>
<td>Commuting Ratio</td>
<td></td>
<td>Not quoted by Experian</td>
<td>0.91</td>
<td></td>
</tr>
<tr>
<td>Double Jobbing</td>
<td></td>
<td>Consistent with Experian forecast</td>
<td>Based on analysis of APS data</td>
<td></td>
</tr>
<tr>
<td>Unemployment</td>
<td>Experian</td>
<td>Reduced by 400 from 2015-17: no further changes modelled</td>
<td>549</td>
<td></td>
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<tr>
<td>Economic-led Need</td>
<td></td>
<td>NMSS estimate is an average of two calculations</td>
<td>549</td>
<td></td>
</tr>
<tr>
<td>2014 PRT</td>
<td></td>
<td>Not an appropriate way to adjust for poor affordability</td>
<td>603</td>
<td></td>
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<tr>
<td>25-34 return to 2001</td>
<td></td>
<td>See above</td>
<td>606</td>
<td></td>
</tr>
<tr>
<td>Affordable Housing Need</td>
<td></td>
<td>Not calculated</td>
<td>517 affordable dpa</td>
<td></td>
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<tr>
<td>Assumed % Delivery</td>
<td>40%</td>
<td></td>
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<tr>
<td>Notional Provision to Meet Full Affordable Need</td>
<td>This figure is purely “notional”: it has no practical meaning</td>
<td>1,293 dpa</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Market Signals</td>
<td>Uplift Proposed</td>
<td>No specific adjustment beyond economic-led need</td>
<td>No specific adjustment beyond economic-led need</td>
<td></td>
</tr>
<tr>
<td>Applied to</td>
<td>Demographic starting point (398 dpa)</td>
<td>Demographic starting point (405 dpa)</td>
<td></td>
<td></td>
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<tr>
<td>Need with Market Signals</td>
<td>Economic Led Need Equates to 15% Uplift</td>
<td>Economic Led Need Equates to 47% Uplift</td>
<td></td>
<td></td>
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<tr>
<td>Adjustment to Accommodate Student Growth</td>
<td>Revised projection includes provision for more than twice the number of additional 18-23 year olds than the expected increase in students in market housing</td>
<td>Nil</td>
<td>23</td>
<td></td>
</tr>
<tr>
<td>Full OAN for Guildford Borough</td>
<td>460</td>
<td>629</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Attached documents:**
Comment: MM23 - LPMM18/5232  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey)  
8556385  Agent:

MM23

In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23

(D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately. It should shape windfall as well as larger sites notwithstanding the anticipated, overdue Development Management Policies.

MM23

Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

This policy should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

Attached documents:

Comment: MM3 - LPMM18/5229  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey)  
8556385  Agent:

MM3

The town centre policy should include an allocation for an all direction bus interchange. Ensuring the centre is designed around sustainable transport is essential. The geography of Guildford, as a constricted, congested gap town with a steeply sloping high street, means that is does not lend itself to a ring round and peripheral bus stop approach. A central bus interchange from which you can travel in any direction is essential. It is a major failing of the plan that no site is identified. With changing demand for retail floorspace, the reasons for loss of the existing bus station site cannot be sustained in the absence of an alternative bus proposal.

MM3 (5)

New town centre development should avoid adverse impact on surrounding residential areas.

MM3 New Policy

There should be a policy (S4) for the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate. At the outset GRA advocated targeted site assembly and redevelopment linked to enhancement in a few locations, such as parts of Park Barn, and this option was not pursued because so much Green Belt was identified. Without a policy to promote this approach there is a concern no action will be taken either in this plan period or in readiness for the next plan period.
**Comment: MM31 - LPMM18/5233  Respondent:** Guildford Residents Association, EGRA (Ms Amanda Mullarkey)  
8556385  **Agent:**

MM31

The North Street policy should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

A height limit for North Street is required.

Where is the allocation for an all-direction bus interchange?

**Attached documents:**

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**Comment: MM32 - LPMM18/5234  Respondent:** Guildford Residents Association, EGRA (Ms Amanda Mullarkey)  
8556385  **Agent:**

MM32

A height limit for White Lion Walk is required.

**Attached documents:**

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**Comment: MM33 - LPMM18/5236  Respondent:** Guildford Residents Association, EGRA (Ms Amanda Mullarkey)  
8556385  **Agent:**

MM33

This should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB eg Merrow Downs.

**Attached documents:**

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**Comment: MM35 - LPMM18/5237  Respondent:** Guildford Residents Association, EGRA (Ms Amanda Mullarkey)  
8556385  **Agent:**

MM35
Gosden Hill should be a candidate for removal from the Plan. It is highly effective Green Belt along the A3 providing a strategic gap traveling from London. It includes a potential location for a future A3 tunnel. Revised housing need figures weaken the justification for development.

“Transport (2)” is too woolly and should clearly require a new access road to a fourway junction onto the A3 at Gosden Hill Farm.

If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM36 - LPMM18/5239  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey) 8556385  Agent: MM36

Blackwell Farm should be a candidate for removal from the Plan. It is Green Belt that also protects views from the AONB along the Hogs Back. Revised housing need figures weaken the justification for development.

Attached documents:

Comment: MM37 - LPMM18/5240  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey) 8556385  Agent: MM37

The proposed land for an access road between the A31 and Blackwell Farm would harm the AONB.

Attached documents:

Comment: MM39 - LPMM18/5242  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey) 8556385  Agent: MM39

Can adding a new Green Belt site at Aaron’s Hill be justified given revised figures?

Attached documents:

Comment: MM40 - LPMM18/5243  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey) 8556385  Agent:
Wisley should be a candidate for removal from the Plan. Revised housing need figures weaken the justification for
development. It does not adjoin Guildford.

Comment: MM41 - LPMM18/5244  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent: 8556385

Should Garlick’s Arch be retained as Green Belt in view of revised housing need, rather than expanded?

Comment: MM43 - LPMM18/5245  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent: 8556385

Can adding a new Green Belt site at Chilworth be justified in view of revised figures?

Comment: MM44 - LPMM18/5246  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent: 8556385

Can adding a new Green Belt site at Send be justified in view of revised figures?

Comment: MM45 - LPMM18/5248  Respondent: Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent: 8556385

Can adding a new Green Belt site at Flexford be justified in view of revised figures?
**Comment: MM9 - LPMM18/5231**  
**Respondent:** Guildford Residents Association, EGRA (Ms Amanda Mullarkey)  
**Agent:** 8556385

MM9

In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed, would harm openness and become a loophole.

**Attached documents:**

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**Comment: MM45 - LPMM18/2487**  
**Respondent:** Angela Gray  
**Agent:** 8557217

**Normandy Local Plan MM45 Policy A64**

I object to the proposed amendment to MM45 Policy A64 a plot of land in previous applications known as land to the East of Glaziers Lane, Normandy not actually Flexford at all.

- What are the exceptional circumstances needed for removing this land from the sensitive green belt? The openness of this area is very important to see and for our wildlife who need corridors of land to move freely in and not squeezed into small areas where they can’t flourish.
- Previous applications for a much smaller number of housing have been refused by Guildford Borough Council on the grounds it is in the green belt. One application for 9 houses I believe was refused only last year. Therefore how can GBC suddenly want to build 105 homes?
- Access to this site will be from Glaziers Lane which is classed as a ‘D’ road with a hump backed bridge just metres away. Glaziers Lane is used by many lorries that cannot use Westwood Lane at they are too high for the railway bridge there. They come thundering over the Glaziers Lane bridge which has a slight bend on it and with up to a possible 200 cars (let’s be honest most homes have on average 2 cars some with young adults may have more) coming out onto this D road it would be disastrous. Also the pavement straight after the hump back bridge (heading towards the Drs Surgery and this proposed development) runs out and pedestrians have to cross to the other side of the road, another huge danger.
- If there is not enough parking for the 105 houses which typically there is not nowadays on new build estates and especially no room for visitors then people will start parking along Glaziers Lane which will make it again very dangerous when cars come over the hump back bridge. We are currently having new pavements laid on Glaziers Lane what we don’t want are cars parking half on the pavement and half on the road wrecking the new tarmac and making it unsafe to walk on.
- The Thames Basin Heath Special Protection Area has been identified as an internationally important habitat for four rare species of bird - the Dartford warbler, woodlark, tree pipit and nightjar. Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations especially as many are ground nesting and easily disturbed.
- I believe the landowner of the lake area of A64 (where the plot is divided by a public footpath) does not want to sell his field? Is GBC compulsory buying land now? It would be criminal to fill in this man-made lake which is 25 year old now and well established. It has become a vital source of water for wildlife especially in a hot summer like we have just experienced. A watering hole for foxes, badgers, kingfisher, and numerous birds. The Great Crested Newt has been found on the SNCI at the Little Flexford Flaxpond just over the railway line and in a pond at Passengers farm not too far away. Great rested Newts are land and water amphibians so are more than likely in this lake as well and they are a Protected Species. We are lucky enough to have barn owls nesting about 400 metres away and this year they succeeded in fledging 5 young. They use the fields around them to hunt for voles and mice and likely to drink from the lake. Many of the streams on the side of the railway bridge A64 dry up in the summer months so taking away this oasis would be criminal.
- To fit 105 homes on this small plot of land one assumes you are thinking of some flats which would be very out of keeping with the a
• There would be no community benefit to having 105 homes on this land. Instead there will be more stress on the sewage and water pipes of an already fragile area.

The part of the field that abuts Glaziers Lane is under water much of the year as it is on the flood plain and is on clay soil. This will be most unsuitable for housing and gardens if they are given any.

Attached documents:

Comment: MM2 - LPMM18/3255  Respondent: Beverley Mussell 8559041  Agent:

Please ask the Inspector of the Local Plan to re-open the examination and amend the Plan to take into account the lower housing need figures that have been produced by the Office for National Statistics.

MM2

The current figure of 672 is now proved to be grossly inflated. The actual need is 360.

Even this number will further damage living conditions for residents of Guildford who already suffer high congestion and pollution levels.

Most of the roads into Guildford are packed to a standstill at peak morning and evenings times. The polluted smog that hangs over the whole area from these exhaust fumes doesn't clear at all on still days.

This is increasing childhood asthma rates and the number of sufferers from breathing diseases such as COPD. No one has the answers which provide a better infrastructure to correct this. Why make it worse for no good reason?

How much of the great push for more houses is driven by the banks and financial system?

Who wants a house where you can't breathe clean air?

There is also the matter of inadequate sewerage provision even for the present population.

Why should greenbelt land (which should be sacrosanct anyway) be lost to make Guildford a worse place to live?

Let's not do this when there is no need to.

It is unfair to expect Guildford to build on Green Belt to make up for a housing shortfall in Woking. Let Woking deal with their own shortfall!

Attached documents:

Comment: MM36 - LPMM18/3256  Respondent: Beverley Mussell 8559041  Agent:

MM36

In view of the lower housing need, Blackwell Farm should be removed from the list of sites approved for development. Development here damages the overall beauty and cohesion of Guildford as a fine example of an English town at peace and complementing its surrounding beautiful countryside. This idea is particularly unwelcome. And now shown to be unnecessary!
Development here also presents serious access and egress problems to an already dangerously congested section of the A31.

Attached documents:

Comment: MM37 - LPMM18/3257  Respondent: Beverley Mussell 8559041  Agent:

MM37 The proposed land for an access road between the A31 and Blackwell would harm the AONB.

Attached documents:

Comment: MM2 - LPMM18/5005  Respondent: Holy Trinity Amenity Group (Robert Bromham) 8559297  Agent:

HTAG Submission to Changes to the Draft Borough Plan, 2018.


Our Group is a member of the Guildford Residents Association, and we fully support their submission, in particular the request that The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

The following are detailed comments relating to our own area and to the town centre that is adjacent our area, and which provides almost all our amenities.

4.1.9(c) Taking into account a reduced housing target, Blackwell Farm should be removed from the site allocations. This area of land, on the North Downs and adjacent the AONB, is important as a component of Guildford’s rural setting. It also has the potential for providing much increased leisure activities, including walking. It could be made easily accessible from our area.

Attached documents:

Comment: MM23 - LPMM18/5010  Respondent: Holy Trinity Amenity Group (Robert Bromham) 8559297  Agent:

POLICY D1. Modification MM 23.

“Efficient use of natural resources (12). All new development will be designed with regard to efficient use of natural resources including passive solar gain to maximise the use of the sun’s energy for heating and cooling.” Add “The loss of materials and embedded energy in demolition of a building is to be taken into account, and opportunity to convert buildings is to be considered in accordance with the NPPF”.

Add, under (6) “Appropriate building height limits will be set for each area”.

Attached documents:

Sustainable Development (2). The “Sustainable Design and Construction Supplementary Planning Document (SPD)” should not be deleted unless it is planned to update it. Suggest add “--or its replacement”.

4.5.39. Building Waste. Add “PVC waste must be recycled, and only incinerated in exceptional cases”.

POLICY ID4. Modification MM29, para. 4.6.48b.

Add “The requirement for an 8m buffer zone applies to all the River Wey within the Borough”.

POLICY S3. Modification MM3.

The addition of a policy to cover the Town Centre is welcome, but it needs to be more concise and positive. It can repeat guidance provided elsewhere but should not present them as quotes, but as clear independent policies of the Borough Plan. If necessary, they should be adapted to fit current circumstances. Detailed comments:

(1) Reword as “Developments will not be allowed that would compromise desired or planned developments on adjacent sites”.

(2) Reword as “Residential development must be considered as a priority for all sites and should be part of any major development”.

(3) Reword as “Schemes must demonstrate that they have made effective use of the site”. While high density developments are anticipated the need for sites to include some open space must also be emphasised. Add: “Guidance on housing density will be given in a revised Residential Design Guide; densities higher than the norm for the area will be allowed in the area up to 300m from the designated centre boundary.” (The present 800m from the centre is too high).

(5) Add, as (e), new developments will “have regard to The Town Centre Conservation Area Appraisal”.

6(b). We presume this refers to open space. We do not understand “well enclosed”. Reword as “Defined public and private open space”.
Paras 4.18 and 4.19 quote the Corporate Plan and The Town Centre Regeneration Strategy. We do not think these should be quoted under the “Reasoned Justification” for the S3 Policy. They should stand as independent parts of the S3 Policy. In this context we have the following comments:

4.1.18 (a). Reword “Facilitating major new residential and mixed-use developments the centre, including in North Street”.

4.1.18 (b). Some parts of the Regeneration Strategy need to be set out as enforceable polices.

4.1.18 (c) Delete “surfaces”. This should not be singled out. There are many improvements needed to the public realm, see comments on 4.1.25 below.

4.1.19. (c). reword “and overall feel” as “and character as an historic market town”.

4.1.19 (h) reword to clarify as “Improve walking links from the town centre to the train station”.

4.1.19 (i) reword as “Conserve and enhance the river Wey and the riverside, including the towpath, as a key historic feature of the town. Develop it as a green wildlife corridor through the Borough, and respect it as a continuous Conservation Area. It must not be compromised by intrusion of new building too close to the river or overshadowing by too high buildings”.

4.1.20. This might be read as an excuse for lack of action. Suggest reword as “Close collaboration will be obtained with other bodies who have some control of the area” and include this in policy.

4.1.25. The public realm. This also should be part of the S3 policy, and should include general improvements to pedestrian facilities such as proper pedestrianisation of the existing town centre, ceasing use of the High Street as a car park for half the day, 20mph limits on roads in and around the town centre, pedestrian priority crossings, pavement widening, reinstatement of pavement curbing, policing of vehicle intrusion onto pavements (particularly in the evening), prohibition of A-boards. It should also include tree planting and seating.

Attached documents:

Comment: MM31 - LPMM18/5013  Respondent: Holy Trinity Amenity Group (Robert Bromham) 8559297
Agent:

POLICY A6, North Street Development. Modification MM31.

Originally this was “Minimum of 41,000 sq m (gross) comparison retail floorspace” and is changed to “Approximately 41,000--- or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies.”

Delete this sentence, as 41,000 is now known to be a false estimate for current circumstances. Replace by “Provision of retail to match retail need assessment made at time of implementation”.

Add “A component of the development will be a high-quality bus station”.

Attached documents:

Comment: MM32 - LPMM18/5014  Respondent: Holy Trinity Amenity Group (Robert Bromham) 8559297
Agent:
POLICY A60, White Lyon Walk.

Add “Height to be restricted to 4 storeys, and design to be appropriate for the Conservation Area and Historic Core”.

Attached documents:

Comment: MM4 - LPMM18/5007 Respondent: Holy Trinity Amenity Group (Robert Bromham) 8559297 Agent:


Re para “Significant reductions from the approximate housing numbers ----and housing uses as set out in the site allocations will be resisted.” Add “Unless new issues are identified”. (This might make it more difficult to get the housing number on the Bright Hill site reduced to allow the present public view to be retained.)

Attached documents:

Comment: MM9 - LPMM18/5008 Respondent: Holy Trinity Amenity Group (Robert Bromham) 8559297 Agent:


Delete the added sentence “Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.” This does not clarify the previous sentence “Inappropriate development will not be permitted unless very special circumstances can be demonstrated” and could create added confusion.

Attached documents:

Comment: MM27 - LPMM18/2889 Respondent: Mr Brian East 8559745 Agent:

MM27, MM41, MM42 & MM48 Transport Strategy.

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons plus of course Gosden Hill and Wisley/Ockham are major and not adequately addressed with the proposed A3 changes etc.

It will I feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.

Attached documents:
I strongly object to the latest Guildford local plan for Send, which if approved will destroy our village, quality of life and cause much stress to local residents.

My objections to the main modifications are as follows:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43.

Increased from 400 to 550 homes.

I'm dismayed to find that despite over 7000 objections previously to this development this was ignored and the number of houses has been increased to 550. This is over development in what is Green Belt and will undoubtedly result in major increases in traffic on the surrounding roads and cause an overburden on our schools and medical facilities which are already under strain.

Attached documents:

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MM27, MM41, MM42 & MM48 Transport Strategy.

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons plus of course Gosden Hill and Wisley/Ockham are major and not adequately addressed with the proposed A3 changes etc.

It will I feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.

Attached documents:

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MM42 Land at Burnt Common, London Road, Send, Policy A58.

Increased from 7000 to a minimum of 14800 sq.m of industrial and storage.

Why having been deleted from the 2014 plan has this been increased twice, doubling the area when there is unused capacity at the Slyfield site.

Where is the demand anyway for industrial land, there are no special circumstances for this so it also contradicts policy MM9.

We already have a 25% increase making a much bigger concentration in Send than any other village with no proven demand.

Again this would impact on the environment and traffic on our already busy roads.
The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons plus of course Gosden Hill and Wisley/Ockham are major and not adequately addressed with the proposed A3 changes etc.

It will I feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.

MM27, MM41, MM42 & MM48 Transport Strategy.

New site for 120 homes.

Although deleted from an earlier draft because of objections it is has been reinstated! It is a Green Belt site with no special circumstances so it does contradict Green Belt Policy MM9.

Additional traffic will just add to the overall traffic problems that Send will have with these large developments.

When you combine this with Garlicks Arch it adds 770 homes to Send that is a 45% increase in houses and is far to much for our infrastructure, furthermore, Im told that according to Consultants and the Office for National Statistics appropriate growth in the Guildford Borough as a whole can be achieved with 460 houses per year.

Why are GBC not looking at Brownfield sites which I understand could meet the requirements.
It will feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.

Attached documents:

**Comment: MM27 - LPMM18/2991**  **Respondent:** Chris Brown 8561057  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes. Currently buses run one an hour to Woking and so people are forced to use cars.

Attached documents:

**Comment: MM41 - LPMM18/2987**  **Respondent:** Chris Brown 8561057  **Agent:**

**Comments on MM for the Guildford Local Plan**

I make the following comments on the Main Modifications to the proposed sites as follows:

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

I Object to the proposal to increase the number of homes on this site from 400 to 550. Anyone who has actually visited the site will see how unsuitable it is.

I object to the number of homes being increased by 37%. With an average of 2 people per house will mean a possible 1000 plus residents who will all require access to roads and amenities.

I went to the hearing about this site and listened to the overwhelming and compelling evidence presented by various groups about how unsuitable this site was. The councils representatives had few answers to this and so the conclusion from the Inspector that the site should be increased and not scrapped is astounding.

It is likely this will add over 750 additional cars to the traffic in the surrounding area. Access to both Guildford and Woking would add to the massive traffic jams at present at Send Dip and the Burnt Common Roundabout. Send Road is already the main access road between Woking and the M25 carrying heavy goods vehicles and articulated trucks.

There is nothing in the Local Plan about additional road infrastructure so the current small roads we currently have which are over-crowded already will simply not be able to cope. If the other proposed sites all go forward then these roads will simply gridlock making life a misery for everyone concerned. There is a serious safety angle to this problem as cars bunch and speed limits are broken to enable to get from A to B on time. The situation will be far worse during weekdays.
The additional traffic which will result from the excessive building programme in Send will make the situation far worse and in all probability result in gridlock.

With the additional houses there will inevitably be families requiring schools for their children. There is only now one primary school for the villages of Send and Ripley since the recent closure of Ripley School. George Abbot is the nearest secondary school and for many years the children of Send and Ripley do not get into the school due to it being over-subscribed. The next nearest school is the Howard of Effingham which currently does not take children from the villages.

There are no plans to build any new schools, surgeries, dentists or amenities.
More houses will mean the current amenities will be over stretched and unable to cope.

In my opinion this is an irresponsible and ill-conceived site to chose.

Attached documents:

Comment: MM41 - LPMM18/2992  Respondent: Chris Brown 8561057  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.
Currently buses run one an hour to Woking and so people are forced to use cars.

Attached documents:

Comment: MM42 - LPMM18/2988  Respondent: Chris Brown 8561057  Agent:

MM42 Land at Burnt Common, London Road Send, Policy A58

I object at the proposal now to double the original area proposed especially in view of the increased capacity at the Send Business Centre and the spare capacity at Slyfield. This will also generate additional traffic consisting of vans and larger vehicles which will all travel through the narrow and already busy roads of Send and Ripley. This will add to further congestion and noise and air pollution.

It will bring safety concerns for local residents and pedestrians in the village who will be using the local recreation ground and need to cross the road.

It will be better to centralise and develop Slyfield Industrial Estate where there is already existing infrastructure and spare capacity.

Attached documents:
**Comment: MM42 - LPMM18/2993  Respondent: Chris Brown 8561057  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes. Currently buses run one an hour to Woking and so people are forced to use cars.

**Attached documents:**

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**Comment: MM44 - LPMM18/2989  Respondent: Chris Brown 8561057  Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

I object to the proposal for 120 homes at this location which is a wholly unsuitable development in such an area and for the same reasons as the other locations in Send namely excessive pressure on local services and additional traffic on a road system which was never intended for such potential traffic volumes.

The only way in and out of this site is through Send Marsh Road which is unsuitable to carry this amount of extra traffic generated by this many houses. Access either end, at Send Dip and Mays Corner onto Send Road is already very difficult due to the congestion through Send and Ripley and the result will be long traffic jams along Send Marsh Road.

This is prime green belt land and there is no reason to make an exception for housing here when there are other areas outside of the greenbelt or on brownfield sites. GBC do not have any explanation as to the reason for the exception to put this land on greenbelt land for this site. This is not acceptable.

**Attached documents:**

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**Comment: MM48 - LPMM18/2994  Respondent: Chris Brown 8561057  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes. Currently buses run one an hour to Woking and so people are forced to use cars.
This can hardly claim to be a policy when the above developments all impinge on the existing Green Belt which GBC seem prepared to sacrifice. Following GBC’s logic, all greenbelt land can be sacrificed and therefore is able to be built on. This breaches all GBC’s own policies and government directives.

General feedback

I really don’t understand why it is necessary to comment again on these sites.

GBC do not appear to be following a democratic process. There have been over 7000 objections from Send and Ripley which is a very loud and clear message to say GBC have got it wrong. Now we are effectively gagged and can only comment on modifications to proposals which appear to be presented as a ‘done deal’.

I do not feel both my own and those of the many residents I know who all share the same feeling are being listened to and each time a plan is presented it is modified to an even more concentrated plan.

We in Send have expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before.

The opening paragraph to the local plan states

“Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough’s most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, supported by suitable infrastructure including education, healthcare and transport. The new Local Plan will be in place until 2034.”

Furthermore there are signs at various points proclaiming

“The Surrey Hills an area of Outstanding Natural Beauty.”

I am very disappointed with the way the Guildford Plan has been presented and the complete lack of listening to resident’s views.

If 7000 objections does not get the message across then I fail to see what GBC need to get the message that they have these proposals completely wrong.
Introduction

This document represents the response of The Guildford Society (the Society) to the Consultation by Guildford Borough Council to the Main Modifications to the Guildford Submission Draft Local Plan (GSDLp).

The Society recognises that the Officers and Councillors of Guildford Borough Council have worked very hard to bring the Local Plan to this stage, and we have participated objectively throughout the Local Plan process, seeking to help the Council to arrive at a sound Local Plan for adoption, to shape, control, protect and enhance our places and spaces, our landscape character and our historic architectural and spatial heritage.

We have been dismayed at times throughout the process, that many of our representations have been ignored or dismissed. We have used as one of our litmus tests of engagement and response, the Council-published Settlement Profiles Report, which we see as a fundamental building block supporting the spatial hierarchy of the Local Plan.

We have consistently pointed out major failings in that document, along with inaccuracies and errors of cutting and pasting, which hamper the interpretation and analysis of the site allocation strategy in key areas – notably in the Guildford Urban Area.

This, in our view, is a contributory factor to (or tangible evidence of) a fundamental failure to plan for development in the two most sustainable tiers in the Council’s Spatial Hierarchy, the Town Centre and the Guildford Urban Area.

In responding to this consultation, we are following the guidance of the Council, in that we are responding to the Main Modifications they have brought forward. We are also keen to point out that, as important as the Main Modifications are, there are some parts of the plan where there should have been Main Modifications, and where these are lacking, and we point some of these out in our response.

This is a very important point, especially having in mind the Examination in Public (the EIP) and the Inspector’s comments throughout the process. The point is that it is reasonable, in law, in responding to this latest consultation, to refer both to Main Modifications made, and also to Main Modifications that should have been made in order for this Local Plan to be lawfully sound.

The Society’s interventions during the EIP, and its representations, have been made objectively, generally to steer the process towards sound planning practices and principles, never seeking to derail or ‘sink’ the Local Plan, but to make it the best we have believed it can be, based on the drafts prepared by the Council.

Some of our interventions have, however, been based on planning law – Statutes and Regulations – and go to the heart of the soundness of the Plan in legal terms.

The Society firmly believes the consultation (and interpretation of responses) should not be screened to only comment on Main Modifications by way of insertions and deletions, and we are also concerned that some of the Minor Modifications in the latest iteration of the GSDLp are poorly made, do not, in some cases, make sense or are ambiguous to the extent of possibly conveying the opposite or a differential meaning from that intended. We have attempted to pick these out to help the Council improve its Plan.

In our submission, we make several references to the lack of soundness of policies as amended.

Please note paragraph 5.22 of the Planning Inspectorate Procedural Practice in the Examination of Local Plans (see APPENDIX I – Procedural Practice in the Examination of Local Plans, June 2016 (4th Edition v.1)) which notes that, in the interests of fairness, the Inspector will provide an opportunity to appear at the hearings to those who seek an amendment which follows directly from the LPA’s proposed post-submission change(s) to the Plan.

As a point of law, we consider this is important, given that we have seen no written recommendation to the Council from the Inspector as part of the EIP process outlining the scope and scale of Main Modifications required, and as we understand there were direct consultations between the Inspector and a Local Plan Officer at the Council.

Please note, therefore, we will be providing a copy of this response to the Programme Officer for the EIP with a direct request for the hearings to be reopened to consider representations made by the Society and others in response to this consultation.
Executive Summary

The Guildford Society has engaged actively and objectively with the Local Plan. We have had little or no interaction with Guildford Borough Council since the Guildford Local Plan Forum was disbanded before the Local Election of 2015 and not reinstated by the new leadership.

There is nothing in our responses to the 2016, 2017 and 2018 responses (including this one) that we would not have worked through with the Council had they been prepared to engage. We do understand that the large numbers of responses may have made any direct interaction much more difficult.

We have got to this stage in the process with that desire to be positive still intact. We do find, though, that the Council has not fully embraced the Inspector’s concerns and comments in its Main Modifications document. We therefore find that the Plan is not yet sound.

As the Inspector reminded us at the beginning of the Examination in Public, soundness involves examining the Plan to determine whether it is:

(a) positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
(b) justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;
(c) effective – deliverable over its period and based on effective joint working;
(d) consistent with national policy – able to achieve sustainable development in accordance with the Framework’s policies.

We believe that the Inspector should reopen the Examination on eight counts (each of which would require further Main Modifications):

1. Policy S2 - Housing Numbers - we largely support Guildford Residents Associations position on housing numbers, which, following publication of the latest ONS Household Formation data, seems to be prescient and well-considered. This really needs to be bottomed out, the Woking figures also need to be revisited. The housing target in the Plan is unjustified.

2. Policy S3 - this Policy doesn’t yet do what it needs to do – it does not provide any commitment or pressing urgency to deliver regeneration. The absence of an allocation of key sites makes the Policy bland and relatively ineffective and must guarantee action on Master Planning and delivery of both development and infrastructure.

3. Policy D1 – this Policy speaks of master planning strategic sites but is severely impaired by the failure to include the Town Centre in the master-planning requirements. To this extent the Plan fails to positively plan the Town Centre for development that would deliver regeneration and housing in the topmost hierarchy of sustainable sites.

4. The Infrastructure Delivery Schedule needs to reflect requirements for Town Centre Infrastructure to deliver on Policy S3, without which the Plan will be ineffective.

5. There is no policy for bringing forward sites in the Guildford Urban Area during the Plan Period, meaning that the second hierarchical tier is completely unplanned – in other words, there is a failure to positively plan the Guildford Urban Area for development that would deliver regeneration of relatively deprived areas and housing in the second tier of the hierarchy of sustainable sites.

6. The Society is adamant that to regenerate the key Town Centre sites as early as practically possible, and within the Plan Period, there must be an allocation or allocations for the Town Centre Regeneration Area, and their omission is unjustified.
7. Policy S1 - The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline "12 years to limit climate change catastrophe" which is within the Plan period. The scientific consensus calls for "urgent and unprecedented changes" to limit the use of fossil fuels. The plan (MM1 S1) in no way reflects the urgency or importance called for, and, as such, it **fails to plan positively.**

8. The Plan directs development to the Green Belt, when it cannot be shown that Green Belt development in the latter years of the Plan could not be better provided in the Town Centre and Guildford Urban Area. This is **contrary to national policy.**

It gives us no pleasure to register these failings of the GSDLP with its Main Modifications, and we would like to work positively with the Council to bring about a sound Local Plan as quickly as is possible.

**Omission 1 - Key Facts about the Borough**

This section is somewhat out of date and should have been amended – especially in Paragraph 2.3 as the ONS forecasts now date from 2016.

The amendment to Policy S1 itself (Policy para (3)(a)) is acceptable to the Society.

The text amendments to Reasoned Justification Paragraph 4.1.4 do not adequately deal with the impact of case law (eg., CJEU Case C-323/17 People over Wind v Coilite Teoranta).

There should not be a presumption in policy that a blanket mitigation strategy be applied, such as SANG charges, without recourse to individual assessment.

The Society has pressed for town centre housing development to be exempt from any blanket charge of SANG contributions where it can be demonstrated that the impact of such development on the SPAs would be de minimis, and that a blanket mitigation strategy would be disproportionate. We would prefer to the SANG funding in these cases being diverted to the provision of affordable homes and/or infrastructure.

Since the Examination in Public, the UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline "12 years to limit climate change catastrophe" which is within the Plan period. The scientific consensus calls for "urgent and unprecedented changes" to limit the use of fossil fuels. The plan (MM1 S1) in no way reflects the urgency or importance called for.

We consider that the Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy, that best practice towards sustainability is adopted, that this is a dynamic concept as opportunities and necessity will change as the sense of urgency increases during the plan period.

The biggest issue within Guildford is peak-time congestion. This doubles fuel consumption and therefore doubles the amount of carbon being produced. Accordingly, there is disproportionate benefit in reducing the amount of traffic to that typical during school holidays. There should be clear targets and mechanisms identified in the plan aimed at achieving this. Bland statements of desire are meaningless, have proved ineffective in previous plans, and would prove ineffective in this one if allowed to persist.

MM1 S1 the word appropriate could be a helpful addition: “sustainable appropriate development”. This might be helpful in the context of sui genesis proposals such as student housing or Costco retailing, or other things not yet thought of, where there is no real policy but they might be considered inappropriate.

MM23 Policy D1 (12) refers to "including passive solar gain to maximise the use of the sun’s energy for heating and cooling". This appears a very muddled and dangerous statement. Passive solar gain is a double-edged sword which can lead to the desire for air conditioning, particularly in commercial buildings or residential properties with large south facing glazed areas. There is a real risk that this well-intentioned idea could have the perverse effect of increasing energy demand for cooling particularly in flats and large houses aimed at overseas buyers and others not constrained by the cost of energy.
Main Modification 10 – Policy P3 (Countryside)

We have no objection to the principle in (1)(c) except that this may be overly prescriptive when considering minor developments such as extensions, dormer windows, etc.

Paragraph 4.3.34a is poorly constructed and needs to be redrafted for the sake of clarity. Perhaps the meaning is intended to be: “Significant growth is planned in the south eastern corner of the previously-defined (when?) Ash and Tongham Urban Area. Whilst it is accepted that some merging will result between the previously-defined urban area and the northern settlement boundary of Ash Green Village (is this shown on any of the local plan maps?), development should be limited to that south eastern corner to preserve and protect the respective identities of Ash & Tongham and Ash Green. Development within the remaining area of buffer between these two settlements, designated as countryside, will be strongly resisted.”

Monitoring Indicators

The target should be zero.

Main Modification 11 – Policy P4 (Flooding)

We accept the additional wording in paragraph (3).

We continue to regret the absence of holistic flood risk planning along our vulnerable River Wey Corridor through the town centre.

We accept the amendments to the Monitoring Indicators.

Main Modification 12 – Policy P5 (Thames Basin Heaths SPA)

We do not believe the Council has met the criteria set out in the People over Wind verdict (CJEU Case C-323/17 People over Wind v Collite Teoranta).
We continue to protest that there is likely to be minimal incremental harm to the Thames Basin Heath’s Special Protection Area resulting from residential development in the town centre, and that no SANG payment should automatically be sought from developers of town centre homes.

**Attached documents:**

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**Comment: MM13 - LPMM18/3149**  **Respondent:** The Guildford Society (Mr Julian Lyon) 8561377  **Agent:**

**Main Modification 13 – Policy E1 (Meeting Employment Needs)**

Policy E1 (1a) provides for a “Borough-wide” allocation of comparison goods retail with an “Assumed gross capacity” of 40,289 sqm. As we have previously pointed out (to no avail) Policy A6 allocates “approximately 41,000 sqm” of comparison retail to the North Street development. The North Street Site is slated to also provide approximately 6,000 sqm of food and beverages space, against an “approximate net gain” of 6,000 to 8,000 sqm of “Assumed gross capacity”.

Clearly, in our minds, this policy is out of step with the allocations. The Inspector pointed out that this land-use allocation seems to be at odds with the national trend for retail floorspace. It is also, in our view, likely to preclude the development of key town centre sites with active street frontages (for example on Bedford Wharf, where retail and food & beverage will be critical components of the new communities (whether offices, residential or a mixture of both).

The Society has also pointed out the anomaly in the Evidence Base that, whereas homes and office & industrial space needs are assessed according to population projections (Objectively Assessed Need), the retail and leisure needs are shown to be a function of Demand. We do not think it appropriate to mix the drivers of need in this way, and we are also concerned that, of the demand identified in the latest retail report, at least two of the major space users have gone out of business since the report was written.

Furthermore, the Town Centre Regeneration Strategy is cited as key evidence for this policy, and yet, the allocation of retail space ignores the proposed development areas in the Town Centre Regeneration Strategy (assuming that, whilst it may be desirable to regenerate these areas, there is no allocation remaining to accommodate within those Regeneration sites).

This policy still does not work effectively, and we would recommend the Inspector holds a further session relating to these critical uses and the Town Centre, having particular regard to Policy S3.

**Attached documents:**

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**Comment: MM14 - LPMM18/3150**  **Respondent:** The Guildford Society (Mr Julian Lyon) 8561377  **Agent:**

**Main Modification 14 – Policy E2 (Locations for Employment)**

Paragraph (1) has created a sequential hierarchy that now places equal weight to sites on the edge of centres and those within 500m of a public transport interchange. This does not seem sensible as it has the propensity to cause additional traffic generation at edge of centre sites without mitigation.

Paragraph 4.4.21a seems to suggest an applicant may wish to draw its red line so as to pass the test rather than to illustrate the true extent of the proposals. We think this is an indication of a poorly-conceived Policy in the first place (paragraphs (3) and (4) of Policy E2).

**Attached documents:**
Comment: MM15 - LPMM18/3151  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 15 – Policy E3 (Employment Capacity)

We do not understand the rationale behind deletion of paragraph 0(b)(a).

We agree the amendments to (3) and, reluctantly, (4) because it is generally in line with Government policy.

Paragraph (6) is unnecessarily wordy and seems to contradict paragraphs (3) and (4) rather than perhaps to qualify those paragraphs. We would suggest: “Where redevelopment or change of use to a non-employment use is envisaged in accordance with paragraphs (3) and

(4) of this policy, such change of use or redevelopment will only be acceptable where the land or premises are suitably located having regard to: its impact on the environment, levels of traffic movement, accessibility to public transport, links to infrastructure, and impact on the amenity of the area or adjoining occupiers.”

We support the inclusion of Paragraph (7) and supporting paragraph 4.4.31a.

Attached documents:

Comment: MM16 - LPMM18/3152  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 16 – Policy E4 (Surrey Research Park)

We agree the wording of paragraph (1). We do believe, however, that this should not act in such a way as to cause the park to fail at times when there is no current demand for research- based businesses, or where, for example, it were seen as prudent to permit co-working or collaboration space which may not be limited to research-type businesses.

We do not object to the amendments to the Monitoring Indicators

Attached documents:

Comment: MM17 - LPMM18/3153  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 17 – Policy E5 (Rural Economy)

We do not object to the modifications to this policy.

Attached documents:

Comment: MM18 - LPMM18/3154  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 18, 19 & 21 – Policies E7 & E8 (Centres)
Paragraph (1a) does not seem to make much sense. This is a Policy for the Town Centre. The policy sets out “to strengthen the liveliness and economic resilience of Guildford town centre.” And yet, if there are “no suitable sites…within the centre”, these uses may be located around the outside. We consider that the final sentence should be deleted.

We do not object to the amendments to paragraph (5), and, whilst the fast food policy was pragmatic, we support its deletion.

We do not object to the amendments to paragraph 4.4.85.

E8

We do not object to the amendments to paragraphs (4) and (5). We do not object to the amendments to paragraph 4.4.89.

Attached documents:

Comment: MM19 - LPMM18/3155  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent: 

Main Modification 18, 19 & 21 – Policies E7 & E8 (Centres)

E7

Paragraph (1a) does not seem to make much sense. This is a Policy for the Town Centre. The policy sets out “to strengthen the liveliness and economic resilience of Guildford town centre.” And yet, if there are “no suitable sites…within the centre”, these uses may be located around the outside. We consider that the final sentence should be deleted.

We do not object to the amendments to paragraph (5), and, whilst the fast food policy was pragmatic, we support its deletion.

We do not object to the amendments to paragraph 4.4.85.

E8

We do not object to the amendments to paragraphs (4) and (5). We do not object to the amendments to paragraph 4.4.89.

Main Amendments 22,20,19,21 – Policy E9 (Local Centres)

We do not object to the inclusion of paragraph 4(a) on the basis the plan is found sound with the allocation of the sites at policies A25, A26 and A35.

We do not object to the amendment of paragraph (6) and the deletion of paragraph (7).

We do not object to the additions at paragraph 4.4.94.

Attached documents:

Comment: MM2 - LPMM18/3137  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent: 


Main Modification 2 – Policy S2 (Spatial Strategy)

It is worth taking a look back at the Sustainability Objectives in table 4.1 of the 2016 Sustainability Appraisal (SA) – table 3.1 of the Sustainability Appraisal (SA Report Addendum, September 2018) (SA Addendum) – which includes:

3. Create and sustain vibrant communities;

4. Maintain Guildford Borough and Guildford Town’s competitive economic role;

9. Provide sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns;

10. Minimise use of best and most versatile agricultural land and encourage the remediation of contaminated land;

11. Conserve and enhance landscape character;

13. Make the best use of previously developed land and existing buildings;

16. Achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)

At 5.2.9 (second and third paragraphs) of the SA Addendum, AECOM say:

“First and foremost the strategy reflects an understanding that there is a hierarchy of places/ potential growth locations within the Borough, and that a sequential approach to allocating development sites must be followed. In other words, capacity should be fully utilised at the most suitable sites (e.g. town centre sites), before moving down to the next tier in the hierarchy, and so on until a residual amount of growth is left to be delivered at sites in the bottom tier, namely village Green Belt sites, which tend to be less suitable for development.

However, the strategy also reflects an understanding that there must be flexibility to deviate from a strict sequential approach, in response to the many issues that can serve to complicate the question of development site suitability. In practice, this means that there can be a need to pass over allocating a site in one tier of the hierarchy, in favour of allocating a more suitable site in a lower tier. Factors that influence development site suitability, unrelated to location in the hierarchy, include (but are not limited to) –

• timescales for delivery (see discussion above, under ‘trajectory’);
• constraints, e.g. in relation to AONB, SPA, flooding, heritage, biodiversity;
• reliance upon, or ability to facilitate provision of, essential infrastructure; and
• policy constraint, e.g. Green Belt sensitivity.”

When we look at the allocations in the GSDLP (Figure 5.2 of the SA Addendum) this shows how scant regard has been given to the spatial hierarchy:
The SA Addendum, at 5.4 (Establishing the reasonable alternative housing scenarios) does not explain what was done to ensure all of the urban and brownfield areas had been considered; rather, it sets out to explain where else in the lower tiers of the hierarchy housing could go.

In the June 2016 SA, Table 6.2, highlighted below, all of the options analysed retained identical numbers for several of the top three bands in the hierarchy: Town centre, Guildford Urban Area and Ash & Tongham Urban Area.

This is indicative of the failure to identify alternative sites focusing firstly on more challenging brownfield sites in the Town Centre and Guildford Urban Area.

The independent expert, Neil MacDonald, has demonstrated to the Guildford Residents Associations that about 360 homes a year would support the ambitious economic growth proposed by the Inspector.
630 homes per year would appear to be out of step with both the new ONS figures and the Government’s Standard Method.1

The figure of 630 homes is based on some inappropriate assumptions.

The Society has common ground with GRA in its analysis, which is consistent with our own analysis.

All that being said, the Spatial Strategy adopted by the Council, contrary to their own Sustainability Assessments, is to direct development onto the Green Belt, citing exceptional circumstances. This argument barely stood up before the publication of the new household formation projections. It certainly does not do so now, and there may be a strong case for removing one, two or even three strategic (Green Belt) sites from the GSDLP.

For this reason, quite apart from the other reasons we have cited in our response, we believe the Examination should be reopened.


This policy has been almost entirely amended but not rethought. It fails to take full account of the Inspector’s guidance in some key areas, and it maintains a higher level of residential provision than is rational or reasonable – particularly having in mind the ONS data on population and household formation as at 2016.

It was common ground between the Council’s advisors (GL Hearn) and the advisors to the Guildford Residents’ Associations (NMSS) that:

1. Considering the 2016-based population projections provided a base demographic estimate of Guildford’s housing need of circa 420 homes per year from 2015 to 2034.
2. The ONS 2017 mid-year population estimates have reduced that number, suggesting around 400 dwellings per annum.
3. The Inspector chose to apply a jobs growth rate that implied a faster population growth than was suggested by the demographic projections.
4. There is no need to make further market signal/affordability adjustment on top of the uplift required to support economic growth.

There were areas of difference, leading to GL Hearn’s OAN at 629 versus NMSS’s OAN at 460 homes per year.

These figures were taken from the Household Formation Rates from the 2014-based household projections. The Household Formation Rates from the 2016-based household projections are considerably lower.

This change of circumstances would have a substantial impact on the Exceptional Circumstances argument made in the GSDLP for the release of various parcels of Green Belt land.

CONCLUSION

The Society, therefore, calls for a follow-up hearing, as part of the EIP, to arrive at a suitable housing target, having regard to the weight of evidence at the earlier hearings that has been shown to be more plausible having regard to the ONS household formation data published last month.
The Guildford Society had expressed its concerns about the staged increase in housing delivery and is pleased to see paragraph (2) deleted.

There does not appear to be any mechanism in the Submission Local Plan (as Amended) to allow for Grampian Conditions to be applied to ensure housing does not come before (or separately from) the infrastructure upon which it will rely and which it will doubtless otherwise impact.

The Guildford Society considers that Paragraph 2a should have been amended to avoid the interpretation that “at least… 41,000 sq m of comparison retail floor space (gross)” will be provided. This is to misinterpret the Evidence Base (which is highly speculative) and the nature and content of discussions and the Inspector’s guidance during the Examination in Public.

The main issue is that Policy S2 does not spell out, in any coherent or conclusive way, the reasoning behind putting the majority of the housing development, allocated in the GSDLP, in the Green Belt. It is our clear view that the Exceptional Circumstances have not been proven.

We have included at APPENDIX 2 – Landmark Chambers: Exceptional Circumstances a series of Cases which deal with the Green Belt.

It seems to us that there are several cases that need careful analysis:

1. Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J, in which it was said that: “Preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to a green belt boundary”. The case notes continue: “the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration”.

2. IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J, in which, distilled from Gallagher (above), it was said: “or revisions to the green belt to be made exceptional circumstances have to be demonstrated. Whether they have been is a matter of planning judgment in a local plan exercise ultimately for the inspector”.

3. Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J, in which it was said: “the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt”.

4. Hunston Properties Ltd [2013] EWCA Civ 1610; [2014] JPL 599, Kay and Ryder LJJ, Sir David Keane; this case deals with Very Special Circumstances rather than Exceptional Circumstances. “On the facts, the Inspector was obliged to find a housing shortfall. However, the weight to be given to such a housing shortfall (and whether it constituted ‘very special circumstances’ for the purposes of NPPF 87) was a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies which restrict development (such as AONBs, National Parks or Green Belts)”.

5. R (Luton BC) v Central Bedfordshire Council [2014] EWHC 4325 (Admin), Holgate J, in which it was said: “…paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: “very special circumstances” have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan.

6. R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin), Ouseley J, in which it was said: “A shortfall in housing land supply can, as a matter of policy, be a very special circumstance, although the occasions when it is likely to suffice by itself to warrant the grant of permission for housing development in the Green Belt are expected to be few and far between”.

7. R (Wildie) v Wakefield Metropolitan BC [2013] EWHC 2769 (Admin), Stephen Morris QC, “Given that inappropriate development is by definition harmful, the proper approach [is] whether the harm by reason of inappropriateness and the further harm, albeit limited, caused to the openness and purpose of the Green Belt was clearly outweighed by the [countervailing benefit arising from the development] so as to amount to very special circumstances justifying an exception to the Green Belt policy”. Furthermore, “whilst principally a case on the content of the “very special circumstances” test, Doncaster is also a case on the adequacy of the reasons given for a finding of very special circumstances. Although this is a case of an inspector's decision and so does not directly relate to the Article 31 duty upon a local authority, nevertheless it does demonstrate the need for sufficient reasons so as not to be left in doubt as whether the very special circumstances test has been correctly applied”.

8. Turner [2016] EWCA Civ 466, Arden, Floyd and Sales LJJ, in which it was found: “The concept of “openness of the Green Belt” is not narrowly limited to the volumetric approach suggested by Mr Rudd. The word “openness” is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.” The findings continued: “Openness of aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness. The preservation of “the setting … of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields. Again, the reference in para. 81 to planning positively “to retain and enhance landscapes, visual amenity and biodiversity” in the Green Belt makes it clear that the visual dimension of the Green Belt is an important part of the point of designating land as Green Belt.” Furthermore: “The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there. But, as observed above, it does not follow that openness of the Green Belt has no visual dimension”.

All of these extracts are small snippets from the cases, and so they do not amount to a legal view or an emphatic position. They do, nonetheless, indicate to us that the failings of the Spatial Hierarchy mean that the plan falls short of its Exceptional Circumstances test.

CONCLUSION

This Policy S2 is not yet amended in a form and to an extent where it is sound. The principal reason for this is that the evidence undermines the figures in the Plan and, in turn, damage or destroy the ‘Exceptional Circumstances’ argument for amending the Green Belt boundaries – a fundamental plank of the GSDLP.
Paragraph 4.1.9a is broadly acceptable as a statement of case and fact (separating it for a moment from the housing numbers themselves). This paragraph should not seek to confuse the provision of student accommodation with the provision of housing per se. The failure of the plan to differentiate is already leading to developments that could, and perhaps should have delivered market homes, being brought forward exclusively for students. This provision of student homes does not alter the underlying need for market homes and should be deleted. The policy and plan should, if functioning well, allow graduates and post-graduates to live and remain in the area should they choose to pursue their careers and build their lives in Guildford Borough.

Paragraph 4.1.9aa refers to outdated housing numbers, highlighting Woking’s undersupply of homes during the Plan period at 630 homes, whereas the ONS 2016 household formation data project that household formation over the plan period will be 146 homes per year fewer.

4.1.9ab is incorrect for the reasons given above.

4.1.9ac should be informed by the most recent population data. What this table continues to highlight is the abject failure of the Council, during the plan-making process, to follow its own spatial hierarchy, to work to bring forward Town Centre and Urban Area housing, and to take all reasonable steps to avoid having to develop green belt sites other than those where previously developed land makes development hierarchically more suitable, and where such development is sustainable.

SUGGESTED RE-WORDING

4.1.9b The Society does not agree with the wording of “…the policies which are most important for determining a planning application would not be considered up to date”. This is misleading and inappropriate. We would suggest this be worded as follows: “where the Housing Delivery Test indicates that the delivery of housing is substantially below the housing requirement over the previous three years, some policies, including policies which are most important for determining a planning application may not be considered up-to-date”.

4.1.10 The Society generally supports the principle of using the ‘Liverpool’ approach but considers the housing numbers themselves need to be adjusted (see above). We are, however, concerned at the soundness of a Plan which seeks to spread its current shortfall over the life of the Plan but where much of the development in the Plan is predicated on the delivery of the A3 (Policy ID2) which is outside the Council’s control.
CONCLUSION

The Council must show it is able, within its control, to deliver sufficient housing throughout the Plan period for the Liverpool method to be appropriate. In this instance, reliance on the A3 (beyond the Council’s control) must put this at risk and the Society advocates a stronger Town Centre Policy framework to require the Council to put themselves in a position (in policy terms) where they can replace undeliverable (or Grampian-constrained) housing in the Town Centre and Urban Areas during the plan period.

4.1.11 The Society accepts the paragraph as amended.

Monitoring Indicators

These need to be adjusted to take account of the most recent household formation forecasts.

Attached documents:

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Comment: MM20 - LPMM18/3158  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Amendments 22,20,19,21 – Policy E9 (Local Centres)

We do not object to the inclusion of paragraph 4(a) on the basis the plan is found sound with the allocation of the sites at policies A25, A26 and A35.

We do not object to the amendment of paragraph (6) and the deletion of paragraph (7).

We do not object to the additions at paragraph 4.4.94.

Attached documents:

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Comment: MM21 - LPMM18/3156  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 18, 19 & 21 – Policies E7 & E8 (Centres)

E7

Paragraph (1a) does not seem to make much sense. This is a Policy for the Town Centre. The policy sets out “to strengthen the liveliness and economic resilience of Guildford town centre.” And yet, if there are “no suitable sites…within the centre”, these uses may be located around the outside. We consider that the final sentence should be deleted.

We do not object to the amendments to paragraph (5), and, whilst the fast food policy was pragmatic, we support its deletion.

We do not object to the amendments to paragraph 4.4.85.

E8

We do not object to the amendments to paragraphs (4) and (5). We do not object to the amendments to paragraph 4.4.89.
Main Amendments 22,20,19,21 – Policy E9 (Local Centres)

We do not object to the inclusion of paragraph 4(a) on the basis the plan is found sound with the allocation of the sites at policies A25, A26 and A35.

We do not object to the amendment of paragraph (6) and the deletion of paragraph (7).

We do not object to the additions at paragraph 4.4.94.

**Attached documents:**

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**Comment: MM22 - LPMM18/3157  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:**

Main Amendments 22,20,19,21 – Policy E9 (Local Centres)

We do not object to the inclusion of paragraph 4(a) on the basis the plan is found sound with the allocation of the sites at policies A25, A26 and A35.

We do not object to the amendment of paragraph (6) and the deletion of paragraph (7).

We do not object to the additions at paragraph 4.4.94.

**Attached documents:**

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**Comment: MM23 - LPMM18/3161  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:**

Main Modification 23 – Policy D1 (Place Shaping)

The Design Policies have been substantively and substantially amended. We are generally unhappy that these policies do not adequately safeguard the character and heritage of most settlements in the Borough.

Policy D4 has been deleted entirely, but the design elements in D4 have not been entirely replaced in D1.

The Guildford Society is adamant that we need to move some of the D4 design policies into D1 where they don’t duplicate.

Policy D1 is too focused on strategic and major sites, rather than being a “merged policy” addressing all development to avoid duplication. We understand that the latter was the intention in scrapping D4 in the first place.

The essential requirement of D1 is set out at the start of the new policy, namely that:-

“All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.”

What is important is the interpretation and application of those words, by both planning officers and Councillors, in the consideration and determination of planning applications – and much is left to individual interpretation.
At the time of the consideration of the Solum application the Council was, and still is, operating under the policies contained in the 2003 Local Plan (albeit as modified by the NPPF). For “Land and buildings at Guildford Railway Station” (Policy G8), paragraph 9.60 states:-

“Development should be in scale with the surrounding environment”

Other supporting paragraphs to Policy G8 refer to the requirements for affordable housing; that any proposals should promote improvements to the townscape; they should respect and provide enhancement of views and improvements to public access to the river; and should incorporate “…improved pedestrian and cycling links between the station, Town Centre and the surrounding areas to the west.”

The Guildford Society’s principal objection to the Solum application was to the fact that the proposals were massive and totally out of scale with the surrounding area; they had an adverse impact on views; there was a less-than-adequate requirement in relation to the provision of affordable housing; there was no improvement in pedestrian and cycling links to the surrounding areas to the west; and (aside from making a contribution to the cost of replacing Walnut Bridge) nothing of any meaningful benefit in respect of securing improvements to the riverside and links to the town centre.

The point is, however good the policies may be, the key issue is whether, in the consideration and determination of planning applications, the Borough Council will seek to ensure that developments comply with the Council’s own planning policy. (Much the same analysis could be made in respect of the (totally out-of-scale) proposals for the Pegasus site on Portsmouth Road).

Sadly, based on its handling of the Solum and Pegasus applications (both at the negotiation and determination stage), Guildford Borough Council showed a track record of non-adherence to its own policies.

Furthermore, a shortcoming in the modifications is in not stressing (or even mentioning!) that as part of the Master-planning process for the major sites (e.g. Gosden Hill, Blackwell Farm) these developments (and the Town Centre) will need to take into account the importance of successfully integrating with the surrounding area. As far as we can see, the guidance contained in the policy only talks about on-site considerations.

The Master-planning process for the major sites should demonstrate that these developments will not give rise to unacceptable consequences in terms of traffic and the impact on existing community facilities such as schools. In short, they need to show how the new development will satisfactorily integrate with the adjoining areas and, if there are problems and/or deficiencies, these should be addressed in tandem with the proposals for new development.

D1

MM23 contains the re-written 'The Place Shaping' Policy' D1, and the deletion of 'Character and Design of New Development' Policy D4.

The Guildford Society is concerned that Policy D4 has been deleted without being fully reinstated elsewhere.

The context of our concerns is that it remains unclear to a user of the Local Plan which policies are saved from the 2003 Local Plan pending publication, consultation and adoption of the impending Development Management DPD; we are, therefore, uneasy that the design and protection policies in this Local Plan do not provide sufficient guidance or protection to ensure good planning nor the maintenance of the character of key areas of the Borough.

We consider that D1 should contain more of the Policies in the abolished D4, adequately addressing character. This is particularly important pending publication, consultation, examination and adoption of the Development Management Local Plan (due in or around 2021).

Formally any 2003 Policy not covered by a new Submission Plan Policy will be covered by the Development Management Policies, with the exception of M8 and the seven Policies which were not saved (H1, H10, S1. G74, RE9, HE11 and U1). Appendix E of the Submission Plan tabulates the Submission Plan's new Policies. For each Policy it sets out the Policies in the 2003 Plan which the new Policy supersedes.
Presumably, any Policy not on the list, except for the above exceptions, will still be valid in so far as they are consistent with the latest version of the NPPF right up until the Development Management Policies are adopted.

We would have preferred this to be made more explicit to ensure the limited policy protections we have are still in play until replaced by the forthcoming DPD.

At present Appendix E says D1 will replace G1(5) on crime prevention and G5(1) on context for design which reads "New development respects established street patterns, plot sizes, building lines, topography, established views, landmark buildings, roof treatment, aspects and relationships with other buildings". Amendments to Appendix E are given in MM49. G5(6) on important views and roofscape is added; it reads "Important public views are protected and opportunities to create attractive new vistas are provided and encouraged".

Are these two Policies G5 (1) and (6) covered adequately by D1 as set out in MM23, taking into account if possible the NPPF.

Appendix E under D4 also listed the 2003 Policies which were covered by D4 but will not be covered following the deletion of D4, namely H4, H10, G1(3) and (12), and G5 (1), (2), (3) and (7). These will have to be covered by Development Management Policies. So for any suggested insertions into D1 from D4 someone will need to check whether any of the above eight Policies need to be added to the list for D1. One could also go through all eight of the 2003 Policies seeing what could be moved to D1 rather than left to Development Management Policies, but I am not suggesting that: It would entail a lot of cross-checking with the NPPF.

In Paragraph (9), strategic sites should not (by omission) be exempt from a requirement to reflect locally distinct patterns and character of development. This would remain compatible with sites creating their own identity, and would allow them to be high quality developments fitting in with the general grain and fabric of Guildford’s market town heritage and its more successful suburbs.

Promotion of ‘green approaches, should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screening around the edge of settlements.

If D1 fails adequately to capture the qualities (including landscape) to be protected along the Wey corridor, then Main Modification 29 should be revised to specifically provide for this.

D1 needs to place greater emphasis on height and bulk of development, given the importance of views into and out of the town, including to and from the AONB.

Policy D1 (12) refers to "including passive solar gain to maximise the use of the sun’s energy for heating and cooling". This appears a very muddled and dangerous statement. Passive solar gain is a double-edged sword which can lead to the desire for air conditioning, particularly in commercial buildings or residential properties with large south facing glazed areas. There is a real risk that this well-intentioned idea could have the perverse effect of increasing energy demand for cooling particularly in flats and large houses aimed at overseas buyers and others not constrained by the cost of energy.

Attached documents:

Comment: MM24 - LPMM18/3162  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:
Main Modification 25 – Policy D3 (Historic Environment)

The Society is alarmed in respect of the main modifications to Policy D3 (2).

This does not seem to us to convey the level of responsibility the Council should have for our heritage assets – particularly at issue in the Guildford historic town centre.

Paragraphs 184 to 202 of the new NPPF may appear to provide adequate reassurance; NPPF 2012, upon which this Local Plan is based, says:

“126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.”

There is no such strategy for conservation or enjoyment. There is no strategy for the heritage assets most at risk. Heritage assets are irreplaceable but this has been deleted from the policy.

It is hugely unfortunate that the Council has chosen to delay its Development Management Local Plan until 2020 or 2021. In the meantime, this revised wording is simply not strong enough to protect Guildford’s heritage assets.

The Development Management Local Plan will be examined under the new NPPF, but in the meantime, we are somewhat underwhelmed by the protection that the NPPF and Policy D3 will afford.

Attached documents:

Main Modification 26 – Policy ID1 (Infrastructure)

The Society supports the amendment to ID1 (4).

All the more important that the Council brings forward town centre developments within its control, so that the Plan does not become unsound due to Grampian conditions leading to a shortfall in housing delivery.

The wording of Policy ID1 (5a) is somewhat odd but generally acceptable to the Society, as are the remainder of the modifications.

Attached documents:

Main Modifications 27, 28 – Policy ID2 (Supporting RIS)

This Main Modification is something of a concession that the Council is unable to control or materially influence the delivery of the Road Infrastructure Strategy.
It will also not be clear, until a package of measures is presented by the Department for Transport, consulted on and adopted, exactly what development this would support on any of the key sites.

The text at 4.6.24ba seems to be rather feeble for a Local Plan:

“Guildford Borough Council proposes to engage with Surrey County Council, the Local Highway Authority, to investigate the potential to amend the Traffic Regulation Order that supports the Guildford town centre Controlled Parking Zone. The forthcoming parking review may provide an opportunity to consider permit eligibility issues, particularly for new developments in areas within the Controlled Parking Zone where existing residents’ demand exceeds the supply of spaces prioritised for their use.”

The highlighted words and phrases point at work that should have been done in preparing the Local Plan, and this woolly wording is inappropriate for a statutory strategic planning document.

The final sentence of that paragraph:

“The possible exclusion of new developments, and any other restrictions on permit eligibility, would operate outside of the planning system.” Is presumably a reference to other measures – maybe legal agreements, which would take two sides to agree. This, again, seems to be inappropriate in the GSDLP.

These Main Modifications make it all the more urgent to bring forward, positively, development in the Town Centre and the Guildford Urban Area to ensure the Local Plan can be kept on track through the Plan Period.

Attached documents:

Comment: MM28 - LPMM18/3166  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

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Attached documents:

Comment: MM29 - LPMM18/3167  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 29 – Policy ID4 (Green/Blue Infrastructure)

The Society has no particular objection to this Main Modification.

Attached documents:

Comment: MM3 - LPMM18/3138  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 3 – Policy S3 (Guildford Town Centre)

The Inspector invited the Guildford Vision Group and The Guildford Society to comment on and submit our response to the draft Policy S3 issued swiftly during the Examination in Public.

We came to the conclusion, in submitting our proposed solution (https://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=28097&p=0), that this needed to have two distinct parts: S3 – The Town Centre; and S4 – The rest of the Guildford Urban Area.

Guildford Borough Council chose to ignore that suggestion and we have not had the opportunity to explain our approach to the Inspector. Policy S3, a crucial plank in the Local Plan’s Spatial Strategy, has also not been examined in public.

CONCLUSION

We request that the Inspector provides the scope to examine both this policy (or these policies), and the hierarchical principles behind it/them, by reopening the Examination in Public.

The NPPF differentiates and distinguishes between town centres and urban areas in terms of densities, and so it is important to treat them separately. In S3 there is now a policy for the town centre. The second most important part of the borough hierarchically is the Guildford Urban Area, where approximately 45% of the population of the Borough lives. It cannot be appropriate to have no specific policies for bringing forward development, even if in due course, in this important area.

NOTE

It is our settled and firm view that one of the principal reasons this area has not been planned, has few site-specific policies, and has contributed a negligible number of sites and homes, is the very poor quality of the Settlement Profiles Report for Guildford Urban Area including the Town Centre (reproduced at APPENDIX 3 – Settlement Profiles Report for ease of reference). This has needed to be dealt with since the initial consultation on the Local Plan, as consistently requested by the Society.

The second part of the Local Plan (the Development Management Local Plan) has not yet been made available, even in draft, and will not be adopted before 2020 at the earliest.
Policy S3 does not incorporate the Guildford Urban Area as a whole. The policy environment throughout the Local Plan provides little protection against garden-grabbing, backhand development, but equally fails to promote and direct development towards areas of greatest need and relative deprivation.

The failure to introduce a policy for the wider Guildford Urban Area will mean that the plan acknowledges the prospect (and propensity) of development and its character in the Town Centre (Policy S3) and in the Green Belt and Countryside (Policy P2 and Site-specific policies), but fails to provide for positive planning in the remainder of the Guildford Urban Area (our proposal for a Policy S4).

As a Group focussing on Guildford’s Transport issues for the last 16 years, the Society’s Transport Group is disappointed that the Council has failed to accept the unique opportunity offered by the Inspector to stiffen up elements contained in their Transport Strategy to create a more positive framework.

Over the years, many studies have been carried out in attempts to alleviate the mainly peak time congestion occurring around the gyratory, each one failing, principally due to the bottleneck caused by the Bridge Street/Farnham Road Bridge intersection. No serious investment has been made, and little change has taken place, except for the closing of two pedestrian underpasses below major routes which have increased the degree of potential conflict between road and pedestrian traffic. Some improved traffic signal controls are promised, and some improved cycle routes contemplated but “Key facts about the Borough” admits that the network of cycle routes is “fragmented and disjointed”.

While the Council fails to be proactive in the planning of all types of movement in the Town Centre, by essentially delegating such matters to the whims of developers, it is likely that the current situation might, at best, become no worse, but certainly no major improvement would be likely. In fact, elements of the Transport Strategy accept that matters will worsen before they improve.

We believe this to be a recipe for Guildford’s stagnation, and a major obstacle to development which is largely within the Council’s control.

To state, in Policy S3, that the Council will “play a key coordinating role” in the development of the Town Centre with a policy, inter alia, to “realise the Council’s ‘drive to, not through’ concept to reduce the impact of traffic in the Town Centre” and to “give priority to pedestrians and cyclists over motor vehicles” is simply not enough. If they plan to delegate transport issues to be funded by developers (as is set out in – or missing from – the Infrastructure Delivery Schedule), the Council must have at least an outline plan for implementation.

The only feature of its Transport Strategy with any impact on the Town Centre is the Sustainable Movement Corridor. While an excellent concept in theory, it could not, in practice, function if overlaid on an unchanged Town Centre traffic structure. It is worth noting that the original proposal by ARUP included a new east-west crossing of both the river and railway, whereas the current proposal simply enlarges an existing pedestrian bridge over the railway to create a low-capacity single lane crossing for buses.

In September Dr. Steve Melia of the University of the West of England, made a presentation to the Borough Overview and Scrutiny Committee. In it he postulated that increasing urban density tended to reduce the amount of traffic in the area but this needed to be in conjunction with diverting major flows of traffic away from it. He quoted the particular example of Taunton where his colleagues would be studying the changes in traffic behaviour as a result of a diversion being planned there to restrict the flow of traffic through the centre of the town. See diagrams below – current (left); and proposed (right):
In our view, this is exactly what Guildford should be planning to do, and to be seeking the necessary funding.

The key feature which the Council has failed to grasp is the need to conceive some means of diverting this current “through” traffic, which it recognises “afflicts the urban area during peak hours” (see 2. Key facts about the Borough) away from the Town Centre, notably from Bridge Street and Onslow Street.

The Society is a supporter and advocate of the Guildford Vision Group Plan, where a new crossing could, with one stroke:

• Free up road space for the Sustainable Movement Corridor to function effectively along Bridge Street, Onslow Street and the southern end of Walnut Tree Close.
• Reduce the number of delaying junctions inherent in the current gyratory system, with two river crossings in close proximity and only one rail crossing at Farnham Road.
• Improve the pedestrian route between the Railway Station and the Town Centre and reducing the potential conflict between pedestrians and vehicles.
• Improve permeability in the area generally for both pedestrians and cyclists, including pedestrianisation.
• Reduce public transport delays allowing buses to keep close to timetables.
• Reduce the pollution in Bridge Street and Onslow Street caused by heavy traffic.
• Divert HGVs which currently benefit from using the bus lane in Onslow Street.
• Provide ready access to the riverside for all.

All of these are aspirations are included in the Society’s Transport Strategy.

In terms of the Evidence Base, we understand that Origin and Destination data now exists for a wider area outside the gyratory which should establish the current pattern followed by through traffic so that a suitable diversionary route can now be identified. It is most likely that this would call for a new east-west crossing, a version of which was first conceived by this Group in 2009.

The Borough is a major landowner in the Town Centre, with only a few others. We believe that elements of the Local Plan need to be amended to include the intention of the Borough to Masterplan areas of the Town Centre so that any necessary land can be reserved for transport improvements. This could be by identifying strategic sites or at least by encouraging essential land assembly.

The Society is concerned that Policy S3, as drafted, contains plenty of wording that will be difficult to translate into the planning assessment of submitted proposals. For example:

Paragraph (1)
In the absence of an over-arching Master Plan and/or specifically designated development areas, how can we encourage development proposals to seek opportunities to take account of the development potential of adjacent sites, when the Plan contains no specific proposals for what those development sites might need to take into account?

Paragraph (2)
We acknowledge the difficulty of having Policy S3 as an enabler for development which was not identified in any detail
in the formation stages of the Local Plan. We do, however, have a qualitative as well as a quantitative concern about the phrase “…will be expected to meet identified housing need.” There should be a clearer policy to make the satisfaction of the Borough’s housing need hierarchically (or sequentially) better in the town centre than outside the urban areas. There should also be some indication of the types of housing that should be accommodated in the town centre.

Paragraph (3)
This policy makes the Society nervous because an unqualified phrase such as “schemes must demonstrate that they have made the most efficient use of land” may simply promote over-development and fail to deliver the place shaping the town centre really needs, or interfere with views, etc.

Paragraph (4)
This seems to us to be a hollow threat of the Council’s use of Compulsory Purchase powers. Without allocating a Master Plan or Regeneration area/site within the Plan, the necessary circumstances for CPO will rarely if ever exist.

The first paragraph (4.1.18) of the section ‘Reasoned Justification’ seems out of place in a plan from 2015 to 2034.

We recognise the statement of aspirations, but past performance does little to suggest that deeds follow words. We find it difficult to reconcile 4.1.19c and 4.1.19d with the Council’s approval of the nine-storey Guildford Plaza scheme, which certainly paid no respect to townscape at ground and roof level, and with the Planning Inspector granting consent to the Guildford Wall that is Solum at Guildford Station.

We would propose some fundamental rewriting of these two paragraphs to achieve what they seem to set out do:

SUGGESTED WORDING

4.1.18 Through the Town Centre Regeneration Strategy we have identified the need to regenerate and improve Guildford town centre, with a key intent to embrace high quality place-making. We have allocated the Town Centre Regeneration Strategy Area for development in accordance with an area-wide Master Plan to be brought forward within the first two years after adoption of the Local Plan. Key projects to support this and the delivery of the Local Plan include:

(a) Facilitating the delivery of a major new mixed development in North Street
(b) Tackling the town centre’s traffic and transport infrastructure
(c) Implementing the Council’s ‘Drive to, not Through’ concept
(d) Increasing visitors’ dwell time to contribute to the town’s vitality, including its leisure and evening economy
(e) Improving the public realm in key town centre areas
(f) Updating Conservation Area and Character Area Assessments
(g) Urgently bringing forward a Roofscapes, Heights and Views Supplementary Planning Document

4.1.19 This policy and the Town Centre Regeneration Strategy will help deliver the following objectives:

(a) enhance the vibrancy of Guildford Town Centre
(b) create and foster high quality design
(c) protect the town’s heritage and overall feel
(d) respect existing townscape at both the street and roof level
(e) create an enhanced and more positive public realm
(f) reduce the concrete environment atmosphere
(g) reduce the impact of traffic in the town centre, complementing future environmental improvements
(h) link the Town Centre to the train station
(i) open up the River Wey and improve connections to the river
(j) assist in meeting Guildford’s housing need
(k) ensure schemes are sustainable and do not block future development potential
(l) promote and create an investment friendly environment

Policy E7 looks somewhat odd after the removal of paragraphs into this Policy S3, but paragraph 4.4.71 could also usefully come across into S3. S3 and E7 should also cross-refer for the sake of completeness.
**Policy S3: Guildford Society Commentary**

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<thead>
<tr>
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<tbody>
<tr>
<td><strong>Introduction</strong></td>
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<tr>
<td>4.1.12 Guildford town centre has a unique setting and historic character and is the largest retail, service, administrative and commercial centre in the county of Surrey (measured by floorspace and number of units). With good transport accessibility by rail and road, it is one of the key town centres in the South East outside of London.</td>
<td>Accepted</td>
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<tr>
<td>4.1.13 The town centre is centred on two linear features, the River Wey, and the High Street that rises up the valley side from Town Bridge. Related to this, the centre has striking topography, with attractive views to the surrounding countryside south and east of the town centre. It is renowned for its picturesque historic High Street and lanes off it, known as ‘gates’ which link the High Street, the Castle and the other key shopping street, North Street. The setting and the historic street pattern in the central area of the town centre are a vital part of its special character as is the range and concentration of heritage assets.</td>
<td>… with attractive views to and from the surrounding countryside west, south and east of the town centre. ADD at the end of the paragraph: “The quality of the town centre deteriorates rapidly towards the north-west, and there are opportunities to regenerate the urban fabric, and to enhance and improve the riverside and shopping areas through greater pedestrianisation and public spaces.”</td>
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<td>4.1.14 The NPPF states that policies should recognise that residential development often plays an important role in ensuring the vitality of centres and therefore should encourage residential development on</td>
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**Agent:**

Comment: MM3 - LPMM18/3139  Respondent: The Guildford Society (Mr Julian Lyon) 8561377
appropriate sites. The Council is committed to ensuring that the policies and allocations within the Local Plan, including those within the Guildford Town Centre, are deliverable and its objectives are realised over the plan period. Furthermore, the Council remains committed to supporting any further opportunities for future development and regeneration within the town centre that reinforces its important role and function. The Guildford Town Centre is intended to function as the key focus for a more intense vibrant mix of uses including residential, office, retail, leisure, tourism, entertainment, and arts and cultural facilities.

4.1.15 The Council is facilitating the delivery of development through a range of proactive measures. These include:

- Driving and unlocking key development projects that form a basis for the delivery of the Local Plan (such as at North Street, A6; Guildford Park Road and Bright Hill car parks, A11 and A12);
- Playing a lead role, working with other delivery partners, in infrastructure interventions that realise growth and regeneration opportunities;
- Advancing and collaborating on key regeneration opportunities as part of the Guildford Town Centre Regeneration Strategy, which include leveraging the Council’s own landholdings as part of efforts to promote mixed use and higher density development supporting the vitality and vibrancy of the town centre.

4.1.16 In undertaking and further to these actions, the Council will explore the use of a range of mechanisms at its disposal to support regeneration and the accelerated development of housing and mixed-use schemes. These include using, where appropriate, compulsory purchase powers, granting permission in principle, assisting in

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<td>land assembly and playing a coordinating role with its development partners around development opportunities.</td>
<td>NOTE: if the plan does not allocate the Regeneration Area AND if there is no specific reference to the sites in the Local Plan, it will be challenging to use some of these mechanisms.</td>
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</table>
4.1.17 The borough’s town centre will form the key focus for these measures to support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with careful attention to the Local Plan’s design policies, Development Management policies, the provisions of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development.

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<td>POLICY S3: Delivery of development and regeneration within Guildford Town Centre Coordination of development in the Town Centre</td>
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<tr>
<td>(1) Development proposals will be encouraged to seek opportunities to enable the future development potential of adjacent sites and not undermine their development potential. More efficient use of land and the acceleration of housing delivery</td>
<td>NOTE: By allocating the Regeneration Area, this will allow D1(15) Masterplanning to apply to the Regeneration Area. The Master Plan needs to be a comprehensive plan covering all appropriate topics from Floods to Riverside and from Infrastructure to Public Realm.</td>
</tr>
<tr>
<td>(2) Major applications will be expected to deliver a mix of uses and include residential development. Residential development in mixed use schemes will be expected to meet identified housing need.</td>
<td>NOTE: Rethink the use of the word ‘need’ with regard to both quantum and mix (maybe by cross-referencing to the Housing Policies). The town centre spatial strategy should not inevitably presume that all developments should be mixed use.</td>
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<tr>
<td>(3) Schemes must demonstrate that they have made the most efficient use of land both in terms of the quantum of development and the mix of uses.</td>
<td>SUGGEST: (3) Schemes must demonstrate that they have made the most efficient use of land both in terms of the quantum of development and the mix of uses within the context of the design Policies at D1, and, for developments within the Regeneration Area, in accordance with the Master Plan</td>
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once adopted, and in the meantime, not preventing nor frustrating such a master plan or comprehensive development.

(4) In seeking to achieve more efficient use of land and/or accelerated housing delivery and/or regeneration, the Council will where appropriate utilise mechanisms such as its compulsory purchase powers.

Without allocating a Master Plan or Regeneration area/site within the Plan, the necessary circumstances for CPO will rarely if ever exist.

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<td>a) the provisions of Policy D1;</td>
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<td>b) the historic environment, street pattern and topography;</td>
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<td>c) important views into and out of the town centre from the surrounding landscape;</td>
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<tr>
<td>d) views within the town centre of important historic buildings and local landmarks.</td>
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It is very clear to us that the Regeneration Area needs to be allocated – either as a set of sites (eg., Water Quarter, Railway Quarter; Bedford Wharf; Walnut Tree Close and Woodbridge Meadows) or as a single Master Plan site, where all of the sites fall within a zone to be planned holistically.

We are not sure how this policy sits with the press release: Transforming Guildford’s Town Centre and Future Continues (https://www.guildford.gov.uk/article/21944/Transforming-Guildford-s-town-centre-and-future-continues).

This says: ““Guildford is a successful and high-performing regional centre and we must keep looking ahead to ensure a vibrant future for our local economy and communities.

"We are now starting work to review and update our Town Centre Regeneration Strategy. This long-term flexible strategy continues to evolve and making our ambitious vision a reality will take time and appropriate investment.

"I am also very pleased that we have engaged external specialists to work with our professional Council teams on our new Guildford Heights and Views Strategy and our new Strategic Development Framework."
Our new Guildford Heights and Views Study will identify particularly important views of our historic places and buildings that help us to better understand the development of the town. Land Use Consultants (LUC) will be assisting with this study, which focusses on the town centre with key views identified from locations outside and on the approach to Guildford. Being located near the North Downs also means there are strong visual links between our town and countryside.

We have also commissioned David Lock Associates to produce a Strategic Development Framework, which will look at overall high level master planning for strategic sites in the borough, including their connections to and from the town centre.

Cllr Spooner adds: "There are great opportunities, as well as challenges, in making our dynamic and attractive town a great place to live, work and visit. There will be consultation opportunities during the next stages of this important work to regenerate Guildford and we'll let people know how they can get involved."

Published on Thursday 16 August.

(6) Schemes must demonstrate high quality urban design and contribute wherever possible to achieving:

| a) | mixed use developments with active ground floor uses; |
| b) | defined public and private spaces which are well-enclosed; |
| c) | an attractive and safe public realm; |

Again, we need the Master Plan for the regeneration area to make sure that this is holistic and cohesive urban planning.

We also need to open out spaces along the river which can only be done – thinking about Policy P4 – by reference to the Environment Agency over a large area.

| d) | legible routes that are easy to understand and to move through, and give priority to pedestrians and cyclists over motor vehicles; |
| e) | improved access and views to the River Wey. |

planned holistically and making smart use of lower levels for water attenuation in times of floods, but active pedestrian-level street frontages.

We also need schemes to make provision for the infrastructure and facilities that will be needed for so many urban homes, including healthcare facilities, education establishments and cultural centres.
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<td>Reasoned justification</td>
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4.1.18 Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its “Place Making” theme. Key projects to support this and the delivery of the Local Plan include:

(a) Facilitating the delivery of a major new mixed development in North Street
(b) Implementing the vision of the Town Centre Regeneration Strategy
(c) Improving the public realm, including surfaces, in key town centre areas

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<td>(e) Increasing visitors’ dwell time to contribute to the town’s vitality, including its leisure and evening economy</td>
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Improving the public realm in key town centre areas

Providing attractive pedestrian areas and routes, including linking the town centre to the railway station

Updating Conservation Area and Character Area Assessments

Urgently bringing forward a Roofscapes, Heights and Views Supplementary Planning Document, and in the meantime restricting new developments to similar heights to the immediately surrounding street scene

4.1.19 This policy and the Town Centre Regeneration Strategy will help deliver the following objectives:

(a) enhance the vibrancy of Guildford Town Centre
(b) create and foster high quality design
(c) protect the town’s heritage and overall feel
(d) respect existing townscape at both the street and roof level
(e) create an enhanced and more positive public realm
(f) reduce the concrete environment atmosphere
(g) realise the Council’s ‘drive to, not through’ concept to reduce the impact of traffic in the town centre, complementing future environmental improvements
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(h) link the Town Centre to the train station
(i) open up the River Wey and improve connections to the river, with an aspiration to provide footpaths and cycle ways on both banks of the river
(j) assist in meeting Guildford’s housing need

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<td>aspiration to provide footpaths and cycle ways on both banks of the river</td>
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<tr>
<td>(j) assist in meeting Guildford’s housing demand</td>
<td>(j) assist in meeting Guildford’s housing need</td>
</tr>
<tr>
<td>Local Plan</td>
<td>GSoc Comment</td>
</tr>
<tr>
<td>------------</td>
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</tr>
<tr>
<td>(k) ensure schemes are sustainable and do not lock future development potential</td>
<td>(k) ensure schemes are sustainable and do not block future development potential</td>
</tr>
<tr>
<td>(l) promote and create an investment friendly environment</td>
<td>(l) promote and create an investment friendly environment [although we are not clear how this operates in practice]</td>
</tr>
</tbody>
</table>

4.1.20 Whilst the Council will play a key coordinating role aimed at achieving delivery of development and regeneration, working with partners such as Surrey County Council, Network Rail and the National Trust, the private sector is central to this process. It is important that schemes that seek planning permission are conceived and designed in a manner that considers regeneration opportunities beyond the boundaries of the site. Collaboration between adjacent and surrounding property owners in the Guildford town centre, including efforts that seek to maximise regeneration opportunities through mutually supportive design elements, uses and access arrangements are supported.

4.1.21 The delivery of housing in the town centre adds to its vitality and vibrancy. The Council regards the town centre as critical in terms of meeting needs for main town centre uses. This includes high trip generating uses such as offices and retail, where there are opportunities to encourage linked trips and maximise the use of public transport networks. However, the town centre also represents the most sustainable location for new higher density housing. Whilst the Local Plan provides for sufficient sites to meet housing needs over the plan period, as part of regeneration efforts, more housing is likely to come forward over the plan period. It is important that this occurs in a manner that makes the most of its central location and is thus developed at a density that maximises its sustainability benefits whilst responding to heritage, design and flooding considerations. Consideration should also be given to the potential to minimise the provision of car parking where this can help optimise the density of development.
4.1.22 The Council will support mixed use development, which can retain or re-provide retail, leisure and employment uses/floorspace in the town centre, in line with national and Local Plan policies. This will help ensure the efficient use of land and presents an opportunity to enhance the vitality of the town centre and increase delivery of homes in sustainable locations.

4.1.23 Enhancing the vitality and vibrancy of the town centre cannot occur solely though more intense uses, nor greater numbers of residents. A quality public realm needs to support day-to-day activities, peoples’ well-being, safety and sense of place and forms the basis for the area’s attractiveness to residents, workers and visitors.

4.1.24 The public realm includes publicly-owned streets, squares, pathways, parks, publicly accessible open spaces, right of ways, and any public or private building and facilities that are accessible by all. Whilst parts of the town centre reflect high quality public environments, there are areas where this could be improved. This is often in areas that represent opportunities for regeneration and intensification of development.

4.1.25 The enhancement of the public realm and its amenity value will ensure the town centre becomes an even more attractive place to live, work and visit and will be a key component of the area’s regeneration. This could occur through a range of interventions such as improving surfacing of public space, providing more generous pedestrian environments, landscaping, street furniture, lighting and public art. The Council will seek contributions toward the improvement of the public realm from developments, where appropriate. The Council will also continue working with Surrey County Council to implement measures that deliver public realm enhancements.
### Key Evidence

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Target</th>
<th>Data source</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local Plan</strong></td>
<td>The number of new homes completed each year in the town centre</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>GSoC Comment</strong></td>
<td>Is this really the ONLY indicator? We believe this should include accidents, air quality, take-up of public transport, numbers of vehicle movements, pedestrianisation, amount of retail and commercial space relative to current and updated assessments of need, amongst other potential measures influenced by positively planning the town centre.</td>
<td></td>
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</tbody>
</table>

It is worthy of note that the Council’s references in 4.1.19(g) to “realis(ing) the Council’s ‘drive to, not through’ concept to reduce the impact of traffic in the town centre, complementing future environmental improvements”, whilst good in principle, does rather ignore the significant volume of traffic that does still travel through the town centre (due to being gap town with no scope for a ring road). It is important to ensure that this through traffic does not impact other routes around the town (e.g., the propensity for traffic to rat-run through Compton to the south west).

The entire transport policy in the Local Plan, the 2015 Town Centre Master Plan and the 2017 Guildford Town Centre Regeneration Strategy has no real substance to it, is based on old data (2011 Sky High Survey) and needs much more rigour.

There needs to be amendment and update to the Infrastructure Delivery Schedule to take into account the works required to specify, design and commission major works to improve the traffic and transport infrastructure in the Town Centre.

**Omission 2 – Guildford Urban Area**

The second hierarchically sustainable tier of development, as set out in the Sustainability Appraisal, is the Guildford Urban Area (described in rather general and unhelpful terms in the Settlement Profiles Report – see Appendix 3).
The Guildford Urban Area comprises approximately half of the Borough’s population, and contains settlements (villages that have, over many years, become suburbs) with differing characteristics, local services, levels of relative deprivation, and, consequently, needs.

The policies in the GSDLP do not provide any positive planning for growth, nor any protection against small or large-scale garden grabbing. This means that, for about half of the population, the GSDLP is at best largely irrelevant and at worst somewhat negative.

**NOTE**

Considering soundness involves examining the Plan to determine whether it is:

(a) positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;

(b) justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;

(c) effective – deliverable over its period and based on effective joint working;

(d) consistent with national policy – able to achieve sustainable development in accordance with the Framework’s policies

Of the tests of soundness set out in the Inspector’s note ID/2 Rev 2, the GSDLP fails in almost every category in the Guildford Urban Area:

The GSDLP, by its silence on relevant matters, is **not positively prepared** as it deals with the Guildford Urban Area – the second tier for identifying development, in which few sites have been identified, and where areas of relative deprivation have been largely ignored.

Leaving the Guildford Urban Area alone for the most part for the entirety of the Local Plan Period **cannot be justified** when the relative deprivation of areas (mostly coinciding with low development density at around 15 Dwellings per Hectare) has not begun to be tackled in the GSDLP.

The GSDLP is ineffective for the Guildford Urban Area

The failure to identify sites where regeneration is most needed has led to the Council looking to meet OAN in the Green Belt. This is **not consistent with national policy** and is counter to the Sustainability Appraisal hierarchy of sustainable locations for development, making the GSDLP unlawful as it stands.

It is disappointing that, during the time taken in preparation of the Local Plan, the Council did not identify areas where substantial regeneration could take place to help meet housing need and to deliver solutions to relative deprivation. We recognise that, in common with the Town Centre, it is not possible to specify numbers of homes that could be delivered with enough certainty to change the allocations in the Plan, and to reduce the need to remove land from the Green Belt.

In common with the Town Centre, the Plan must lay the groundwork for regeneration in the life of this Plan or at least ready for implementation early in the next plan period.

**REQUEST TO REVISIT THIS TOPIC**
As a result of the general failure to plan the Guildford Urban Area, we request that the Inspector reopens the Examination in public to address this topic.

Attached documents:

Comment: MM31 - LPMM18/3168  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 31 – Policy A6 (North Street)

This Main Modification needs to be read alongside our comments to Main Modification 2 – Policy S2 (Spatial Strategy), which seems to suggest that “provision has been made for at least… 41,000 sqm of comparison retail floorspace” across the Borough, and yet Policy A6(1) says that North Street alone will deliver “Approximately 41,000 sqm (gross) comparison retail floorspace…”

A height guide and limit should be imposed on this allocation.

We have not seen an allocation anywhere in the GSDLP for an all-direction bus interchange.

We consider this allocation should be amended to reflect the more flexible and less specific approach of promoting high quality mixed-use development (MM18).

As we have commented extensively previously, we are concerned that (a) the amount of retail in one centre is an outdated model; and (b) the impact on the High Street – especially if the retail sector continues to implode – could be devastating to Guildford, its attractiveness and its heritage.

Attached documents:

Comment: MM32 - LPMM18/3169  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 32 – Policy A60 (White Lion Walk)

The Society has no objection in principle to the new allocation of this site specifically in the GSDLP.

We are, nevertheless, concerned that there is no height, bulk or mass guide, that this is one site that does not appear to have been subjected to a rigorous test to see what can actually be accommodated on the site.

The Society believes that this allocation should be viewed in conjunction with the site to the east of the current allocation (including Marks & Spencer) to allow for a reallocation of retailers and to regenerate the M&S store, which we understand has some restrictions due to deleterious building materials. (red line below)

We also believe that this development should extend westwards to include the loading bays for the White Lion Walk development and also the unused/underused Phoenix Court, and to improve the residential space above the shops fronting Friary Street. (orange line below)

A plan is set out below incorporating the larger site:
Main Modification 33 – Policy A24 (Slyfield – SARP)

The Society remains concerned that there is still no policy paragraph on height and bulk, on set-back from the River Wey, and providing that walkways and cycle ways alongside the river are accommodated.

APPENDIX 1 – Procedural Practice in the Examination of Local Plans, June 2016 (4th Edition v.1)
Post-Submission Changes Initiated by the LPA

- 5.20 The Inspector will take the published plan (and if relevant, the addendum submitted with the plan to address matters arising from the public consultation on the plan at regulation 19 stage) as the final word of the LPA. Therefore, there is a very strong expectation that further LPA-led changes to the plan will not be necessary and this is a key premise of delivering an efficient examination timetable. Provision for changes after submission of the plan is to cater for the unexpected. It is not intended to allow the LPA to complete or finalise the preparation of the plan. In order for the Inspector to take forward any change (in effect a proposed main modification) initiated by the LPA (or any other party in the examination), the requirements of section 20(7B) and (7C) of the PCPA must be met. For example, a LPA’s change of preferred approach to a policy (including a site allocation) could not be accommodated unless the policy/site as submitted is, in the Inspector’s view, unsound or not legally compliant and the proposed change initiated by the LPA (or any other party) would make the plan sound/compliant.

- Any such proposed change should, where appropriate, be subject to the same process of publicity and opportunity to make representations as at regulation 19 stage and it would usually be handled as part of the section 20(7C) process set out in the paragraphs. If the proposed change were to alter the thrust of a policy, extend the range of development to which a policy applies, delete a policy or introduce a new policy, two very important considerations need to be borne in mind. Firstly, the proposed change must not undermine, or possibly undermine, the sustainability appraisal process that has informed the preparation of the plan. Secondly, it should be subject to adequate community engagement. If the LPA has taken appropriate steps to address these matters, the proposed change may in some instances be acceptable as set out in the paragraph above.

5.22. The consultation on the proposed change may generate new representations. If so, in the interests of fairness, the Inspector will provide an opportunity to appear at the hearings to those who seek an amendment which follows directly from the LPA’s proposed post-submission change(s) to the plan.

- Where the LPA proposes such changes, the Inspector will expect all the relevant material to be made available without the need for undue delay to the examination Guidance on the consideration of and procedures for suspension of the examination to allow further work to be carried out by the LPA, is provided in Section 9 ‘Exceptional Procedures’ of this guide.


APPENDIX 2 – Landmark Chambers: Exceptional Circumstances

http://www.landmarkchambers.co.uk/nppf9

This document is reproduced in full as indication of case law as it relates to the Green Belt.

There are some very useful cues as to the interpretation of very special circumstances and exceptional circumstances (the latter being the test for Local Plans where there is an intention to amend Green Belt boundaries or allocate development within the Green Belt. The emphases are ours.

SECTION 9 – PROTECTING GREEN BELT LAND NPPF 79-92

Timmins v Gedling DC [2014] EWHC 654 (Admin), Green J

Paul Brown QC appeared for the first Claimant

The Council found that the proposed development (cemetery) was appropriate development in the Green Belt, since it would preserve openness and would not conflict with the purposes of including land in the Green Belt.

“In my judgment, properly interpreted, section 9 NPPF means that any development in the Green Belt is treated as prima facie “inappropriate” and can only be justified by reference to “very special circumstances” save in the defined circumstances set out in paragraphs 89 and 90.” [25]
The true position surely is this. Development that is not, in principle, “inappropriate” in the Green Belt is, as Dove J. said in paragraph 62 of his judgment, development “appropriate to the Green Belt”. On a sensible contextual reading of the policies in paragraphs 79 to 92 of the NPPF, development appropriate in – and to – the Green Belt is regarded by the Government as not inimical to the “fundamental aim” of Green Belt policy “to prevent urban sprawl by keeping land permanently open”, or to “the essential characteristics of Green Belts”, namely “their openness and their permanence” (paragraph 79 of the NPPF), or to the “five purposes” served by the Green Belt (paragraph 80). This is the real significance of a development being appropriate in the Green Belt, and the reason why it does not have to be justified by “very special circumstances”. [24]

NPPF 79

R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJJ

“The concept of “openness” here means the state of being free from built development, the absence of buildings – as distinct from the absence of visual impact” [7]

NPPF 80

Smith [2017] EWHC 2562 (Admin), Sir Ross Cranston

Richard Turney appeared for the Claimant

Zack Simons appeared for the Secretary of State

“No authority was cited for the proposition that "urban sprawl" mentioned in para.80 of the NPPF is confined to urban sprawl through building.” [33]

NPPF 81

Fordent Holdings v Secretary of State for Communities and Local Government [2013] EWHC 2844 (Admin), HHJ Pelling QC

Change of use can fall within NPPF 81, but this does not mean by definition that a change of use falling within NPPF 81 is necessarily not inappropriate development for the purposes of NPPF 90. [23]

LOCAL PLANS

NPPF 83

Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J

Christopher Lockhart-Mummery QC and Zack Simons appeared for the Claimant

Preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to a green belt boundary. [125]

"124. There is a considerable amount of case law on the meaning of "exceptional circumstances" in this context. I was particularly referred to Carpets of Worth Limited v Wyre Forest District Council (1991) 62 P & CR 334 ("Carpets of Worth"), Laing Homes Limited v Avon County Council (1993) 67 P & CR 34 ("Laing Homes"), COPAS v Royal
From these authorities, a number of propositions are clear and uncontroversial.

Planning guidance is a material consideration for planning plan-making and decision-taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant

The test for redefining a Green Belt boundary has not been changed by the NPPF (nor did Mr Dove suggest otherwise).

In Hunston, Sir David Keene said (at [6]) that the NPPF "seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that 'the general extent of Green Belts across the country is already established'”. That appears to be a reference to paragraphs 83 and 84 of the Paragraph 83 is quoted above (paragraph 109). Paragraph 84 provides:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development?"

However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans (e.g. paragraph 2.7 of PPG2: paragraph 83 above), and has always required "exceptional circumstances” to justify a revision. The NPPF makes no change to this.

1. Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green. That is the ratio of Carpets of Worth.

ii) Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.” [124]-[125]

Gallagher Homes Ltd v Solihull DC [2014] EWCA Civ 1610, Laws, Patten and Lloyd LJJ

Christopher Lockhart-Mummery QC and Zack Simons appeared for the Claimant Christopher Katkowski QC appeared for the Council

“The fact that a particular site within a council’s area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question.” [36]

IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J

“What is clear from the principles distilled in the case of Gallagher is that for revisions to the green belt to be made exceptional circumstances have to be demonstrated. Whether they have been is a matter of planning judgment in a local plan exercise ultimately for the inspector. It is of note that in setting out the principles in Gallagher there is no reference to a falsification doctrine [that the basis on which land was excluded from the Green Belt has been falsified] or that any release of green belt land has to be seen as a last resort.” [96]


Richard Turney appeared for the Claimant
“Mr Turney … submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes… Suitability simpliciter cannot logically be envisaged as an exceptional circumstance…; suitability and availability may do, subject to the refinements discussed below.

NPPF 83-84


Richard Turney appeared for the Claimant

“The second sentence of paragraph 84 is not altogether clear. On the face of things, it might well be argued that it appears to reinforce the need to protect the Green Belt, but in my view it is capable of being interpreted slightly more broadly. The consequences for sustainable development may require revision of the Green Belt. Nonetheless, I do not readily agree with Miss Ellis that paragraph 84 throws any light on the meaning of “exceptional circumstances” within paragraph 83, or should be taken as somehow diluting this aspect. Sustainable development embraces environmental factors, and such factors are likely to be negatively in play where release of Green Belt is being considered. The second sentence of paragraph 83 supplies a fetter or brake on development which would, were it not for the Green Belt, otherwise be sustainable; but in deciding whether exceptional circumstances pertain regard must be had to the whole picture, including as I have said the consequences.” [19]

NPPF 84

IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J Paragraph 84 “is clear advice to decision makers to take into account the consequences for sustainable development of any review of green belt boundaries. As part of that patterns of development and additional travel are clearly relevant.” [98]

NPPF 87

Hunston Properties Ltd [2013] EWCA Civ 1610; [2014] JPL 599, Kay and Ryder LJJ, Sir David Keane

Matthew Reed appeared for the Council

On the facts, the Inspector was obliged to find a housing shortfall. However, the weight to be given to such a housing shortfall (and whether it constituted ‘very special circumstances’ for the purposes of NPPF 87) was a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies which restrict development (such as AONBs, National Parks or Green Belts).

Fordent Holdings v Secretary of State for the Home Department [2013] EWHC 2844 (Admin), HHJ Pelling QC

The meaning of ‘development’ in the NPPF is the same as in s.55 of the TCPA 1990. A material change of use can be inappropriate development for the purposes of NPPF 87: [18].

R (Khan) v LB Sutton [2014] EWHC 3663 (Admin), Patterson J

[After quoting from Wychavon District Council v Secretary of State for Communities and Local Government [2008] EWCA Civ 692]

“The guidance in the NPPF is unchanged in relation to very special circumstances. As such, whether a factor constitutes a very special circumstance is a matter for the decision maker in the exercise of his judgment in any particular case.” [80]

R (Luton Borough Council) v Central Bedfordshire Council [2015] EWCA Civ 537 (Longmore, Tomlinson, Sales LJJ)
“...paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: “very special circumstances” have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan.” [54]

NPPF 88

Redhill Aerodrome Ltd [2014] EWCA Civ 1386, Sullivan, Tomlinson, Lewison LJ

James Maurici QC appeared for the First Appellant Secretary of State

Stephen Whale appeared on behalf of the Second and Third Appellant Councils

Christopher Katkowski QC and Alistair Mills appeared on behalf of the Respondent, Redhill Aerodrome

The phrase “and any other harm” means any harm, not only harm the Green Belt.

Copas v Secretary of State for Communities and Local Government [2014] EWHC 2634 (Admin), Supperstone J

Matthew Reed appeared on behalf of the Claimants

NPPF 88 deals with the issue of weight to be attached to factors [32].

R (Luton BC) v Central Bedfordshire Council [2014] EWHC 4325 (Admin), Holgate J

“The NPPF does not require the planning authority to chop up a mixed use proposal into separate components and to apply the very special circumstances test separately in relation to each such component. No authority was cited to support that interpretation and I do not think that it is justifiable on the language used in paragraph 88 of the NPPF.” [167]

Dear v Secretary of State for Communities and Local Government [2015] EWHC 29 (Admin), HHJ Belcher

Stephen Whale appeared for the Secretary of State

The case concerned the weight to be given to harm to the Green Belt, in circumstances where the best interests of children must also be a primary consideration,

“In my judgement, provided the decision-maker ascribes the correct weight at the outset, in carrying out any adjustment to the weighting when considering the individual circumstances of the case, it matters not whether he reduces the weight on one side of the balance, or increases the weight on the other. The effect will be the same.” [47]

R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin), Ouseley J

“A shortfall in housing land supply can, as a matter of policy, be a very special circumstance, although the occasions when it is likely to suffice by itself to warrant the grant of permission for housing development in the Green Belt are expected to be few and far between. That is in effect what the NPPF and the Ministerial statement say. So there is nothing unlawful in the committee treating it as one of a number of very special circumstances. I do not accept Mr Harwood's submission that the committee considered it as another material consideration rather than as a very special circumstance. But, if so, it does not help the claimant. Once the issue is whether or not inappropriate development should be permitted in the Green Belt, all factors which tell in favour of the grant go to making up very special circumstances, which may or may not suffice. It is not necessary to go through the process of considering whether a factor is not a very special circumstance but nonetheless falls to be taken into account in favour of the development as another relevant material consideration. See Secretary of State for Communities and Local Government v Redhill Aerodrome Ltd [2014] EWCA Civ 1386.” [68]

Atkins v Tandridge City Council [2015] EWHC 1947 (Admin), Dove J

Adopted the need for Green Belt harm and other harm to be clearly outweighed, in Doncaster MBC v Secretary of State [2002] EWHC 808 (Admin), para 70:
“Given that inappropriate development is by definition harmful, the proper approach is whether the harm by reason of inappropriate and the further harm, albeit limited, cause to the openness and purpose of the Green Belt, was clearly outweighed by the benefit to the appellant’s family and particularly to the children so as to amount to very special circumstances justifying an exception to Green Belt policy.”

R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJJ

“The first sentence of paragraph 88 of the NPPF must not be read in isolation from the policies that sit alongside it. The correct interpretation of it, I believe, is that a decision-maker dealing with an application for planning permission for development in the Green Belt must give “substantial weight” to “any harm to the Green Belt” properly regarded as such when the policies in paragraphs 79 to 92 are read as a whole (consistent with the approach taken, for example, in the judgment of Sullivan L.J., with whom Tomlinson and Lewison L.JJ. agreed, in Redhill Aerodrome Ltd. v Secretary of State for Communities and Local Government [2015] P.T.S.R. 274, at paragraph 18). Reading these policies together, I think it is quite clear that “buildings for agriculture and forestry”, and other development that is not “inappropriate” in the Green Belt, are not to be regarded as harmful either to the openness of the Green Belt or to the purposes of including land in the Green Belt. This understanding of the policy in the first sentence of paragraph 88 does not require one to read into it any additional words.” [17]

NPPF 89

R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin), Ouseley J

“The words “agricultural building” in the NPPF, as in the legislation, in my view mean a building used for the purposes of agriculture alone and do not include one which was used for the purposes of agriculture alone and do not include one which was used for agricultural purposes but which, lawfully, is now used for another purpose, mixed with agriculture or not. These buildings were in fact no longer used for agricultural purposes alone. A barn now converted to a dwelling was once used for agricultural purposes, it was an agricultural building, but it is now a dwelling house and not an agricultural building.

The second aspect of this issue is whether nonetheless, as Mr Jones contended, the previous agricultural use of the buildings meant that the land was still excluded from “previously developed land” as it remains land which “is or has been occupied by agricultural buildings”. The language of the exclusion was quite straightforward. Mr Harwood contended that the exclusion could not apply where the agricultural use of the buildings had ceased and had been replaced by another use, whether a permitted use, or one which had become a lawful use. The position would be even more obvious if the buildings had been demolished and lawfully replaced with other buildings for use for non-agricultural purposes, but which logically on Mr Jones' submission would still mean that the land “has been occupied” by agricultural buildings.

In my judgment, those words must be read in the context of the words defining previously developed land. That is land which “is or was occupied by a permanent structure”. The exception uses the words “is or has been occupied by agricultural buildings”. The policy first looks at the present position and asks what buildings occupy the site, to which the answer is: buildings lawfully not used for agricultural purposes. The present tense deals with the position as it is. The policy then looks at whether the land “was” or “has been” occupied by permanent structures or certain buildings. The past tense deals with the position where the buildings which once occupied the land no longer do so, having been demolished, or fallen down. Their removal does not in general prevent land being previously developed land, and in the case of agricultural buildings, their removal does not end the exception. The past tense is not used to deal with former agricultural buildings which continue occupy the land but which are no longer agricultural buildings. That is covered by what “agricultural building” means.

The problem with Mr Jones' approach is threefold, although I can see that his interpretation is a possible one. First, it does not seem to me the most natural reading of the language of the policy. The policy would have to cover the position where buildings still occupy on the site, and where they once occupied the site but have since been demolished or have fallen down. That is what the two tenses deal with. The use of the past tense to cover both sites no longer occupied by any
buildings, and sites still occupied by buildings but which have changed from a use within the exception to one outside it, rather strains the scope of quite simple language. Second, the policy justification for his suggested interpretation is not strong enough to overcome that reading. The aim of the agricultural building exception is to avoid a necessary exception to normal policies, agricultural buildings in the countryside and the Green Belt, often permitted development not requiring specific planning permission, becoming the vehicle, through this new policy, for allowing built development which would otherwise be inappropriate in the Green Belt, or not normally allowed in the countryside. Were the lawful change of use of an agricultural building to become the vehicle for a new non-agricultural building, the aim of the policy could be to some degree undermined though it would still cover the erection of new non-agricultural buildings. I do not think that that makes a sufficient dent in the rationale for the policy to overcome the simple reading of straightforward language. Third, it would introduce some very odd consequences which I cannot accept are intended. If agricultural buildings had once occupied a site, whether they had changed their use long ago, or had been demolished and replaced with non-agricultural buildings with permission, the site could not be previously developed land. If the whole of the southern site is redeveloped for housing, it would still be within the exception to previously developed land when any further redevelopment took place. Accordingly, I conclude that the southern part of the site was correctly treated as previously developed land.” [38]-[41]

Gill [2015] EWHC 2660 (Admin), Rhodri Price Lewis QC

Stephen Whale appeared for the Secretary of State

“The description of development was amended to refer to the retention of the building and its change of use to offices but it still did not involve the construction of a new building applying the ordinary and natural meaning of those words.” [31]

R (Robb) v South Cambridgeshire District Council [2017] EWHC 594 (Admin), Ouseley J

Andrew Parkinson appeared for the Claimant

“Where the NPPF refers to exceptionally treating as appropriate limited affordable housing for local community needs "under policies set out in the Local Plan", it plainly intends that the relevant policy, here HG/5, should be properly complied with; that is, complied with according to its terms. Its terms require compliance in full with the criteria.” [24]

R (Tate) v Northumberland County Council [2017] EWHC 664 (Admin), HHJ Belcher

This case concerned whether a settlement was a village for the purpose of the penultimate bullet point of NPPF 89.

“Whilst accepting that there is no one definition of a village, Miss Graham Paul submitted that in interpreting Green Belt policy, and giving the word 'village' its ordinary reasonable meaning, for a settlement to be considered a village it must have at least one of the following: a clear core, boundaries, an evolution of different housing types and styles, basic services, highway frontage, or a population of between hundreds and thousands. Her skeleton characterise this submission as "must have" at least one of those criteria. In her oral submissions, she accepted the position was more nuanced. She accepted that no one factor was determinative, but she submitted that a village should have at least one of those criteria.” [19]

“...a decision which does not add up - in which, in other words, there is an error in reasoning which robs the decision of logic.” [25]

“In my judgment I cannot possibly conclude that a village must have at least one of the items on Miss Graham Paul's list, or that in the absence of at least one of the criteria in her list, a decision that a particular settlement amounts to a village is, therefore, irrational. There is no proper basis upon which I could conclude that any of the criteria is required. It would amount to my own subjective view and, in effect, a review of the decision itself (which is not the function of judicial review) rather than a review of the decision making process (which is the function of judicial review). In my view Miss
Graham Paul's list is inevitably subjective, and the subjective decisions to be made on the facts of this case are properly to be made collectively by those exercising planning judgement.” [27]

R (Robb) v South Cambridgeshire District Council [2017] EWHC 594 (Admin), Ouseley J

Andrew Parkinson appeared for the Claimant

“When the NPPF refers to exceptionally treating as appropriate limited affordable housing for local community needs "under policies set out in the Local Plan", it plainly intends that the relevant policy, here HG/5, should be properly complied with; that is, complied with according to its terms. Its terms require compliance in full with the criteria.” [24]

Attached documents:

Comment: MM33 - LPMM18/3171 Respondent: The Guildford Society (Mr Julian Lyon) 8561377 Agent: NPPF 89-90

Fordent Holdings v Secretary of State for Communities and Local Government [2013] EWHC 2844 (Admin), HHJ Pelling QC

“Previous national policy in relation to Green Belt development defined material changes of use as inappropriate unless they maintained openness and did not conflict with the purposes of including land within the Green Belt – see PPG2, Paragraph 3.12. That approach has not been carried through into the NPPF however, where the preferred approach is to attempt to define what is capable of being “not inappropriate” (footnote) development within the Green Belt with all other development being regarded as inappropriate by necessary implication. It is for this reason that there is no definition within Chapter 9 of the NPPF of what constitutes inappropriate development, or any criteria by which whether a proposed development is or is not appropriate could be ascertained. It is for that reason that Paragraph 89 of the NPPF provides that a particular form of development - the construction of new buildings – in the Green Belt is inappropriate unless one of the exceptions identified in the Paragraph applies. Paragraph 90 defines the “other forms of development” there referred to as also at least potentially not inappropriate. The effect of Paragraphs 87, 89 and 90, when read together is that all development in the Green Belt is inappropriate unless it is either development (as that word is defined by s.55 of the TCPA) falling within one or more of the categories set out in Paragraph 90 or is the construction of a new building or buildings that comes or potentially comes within one of the exceptions referred to in Paragraph 89.” [19]

Footnote: “In the course of the submissions before me, I was told that the correct distinction was between inappropriate development and development that was “not inappropriate”. I note that this is not the phraseology adopted for example in Europa Oil and Gas Limited v. SSCLG (ante) where the antithesis of inappropriate is said to be “appropriate”. In this judgment I have maintained the phraseology used by the parties without reaching any judgment as to whether its use is correct.”

Change of use can fall within paragraph 81, but this does not mean by definition that a change of use falling within paragraph 81 is necessarily not inappropriate development for the purposes of paragraph 90: [23].

“There is no general exception for changes of use that maintain openness and do not conflict with the purposes of the Green Belt.” [24]

Paragraph 89 is a “closed list of classes” [25]. It applies only to the construction of new buildings [26].

“Merely because a proposed development is inappropriate does not mean that there is a prohibition on it. The categories of what constitute very special circumstances are not closed.” [28]

R (Wildie) v Wakefield Metropolitan BC [2013] EWHC 2769 (Admin), Stephen Morris QC
Zack Simons appeared for the Claimant

Considering “very special circumstances”

“First, the correct approach to the very special circumstances test is to ask the following question (adapting the wording of §70 in [Doncaster Metropolitan Borough Council v Secretary of State for the Environment, Transport and the Regions [2002] EWHC 808 (Admin)] (as approved by Carnwath LJ in [Wychavon District Council v Secretary of State for Communities and Local Government [2008] EWCA Civ 692 [2009] PTSR 19] §26)):

“Given that inappropriate development is by definition harmful, the proper approach [is] whether the harm by reason of inappropriateness and the further harm, albeit limited, caused to the openness and purpose of the Green Belt was clearly outweighed by the [countervailing benefit arising from the development] so as to amount to very special circumstances justifying an exception to the Green Belt policy”

“Thus, in considering whether to allow development in the Green Belt, the decision maker must consider, first, the “definitional” harm arising from the inappropriate development as well as such further harm to the Green Belt as is identified as being caused by the development in that case, and then secondly consider countervailing benefits said to be served by the development; and then consider whether those benefits clearly outweigh the harm so as to amount to very special circumstances. Secondly, in order to qualify as “very special”, circumstances do not have to be other than “commonplace” i.e. they do not have to be rarely occurring. Thirdly, the test is not one of whether the harm to the Green Belt (definitional or specific) is “significant or unacceptable”, either of itself or following the balancing exercise.

“I add that, whilst principally a case on the content of the “very special circumstances” test, Doncaster is also a case on the adequacy of the reasons given for a finding of very special circumstances. Although this is a case of an inspector's decision and so does not directly relate to the Article 31 duty upon a local authority, nevertheless it does demonstrate the need for sufficient reasons so as not to be left in doubt as whether the very special circumstances test has been correctly applied: see Doncaster , §§74 and 75.”

R (Lloyd) v Secretary of State for Communities and Local Government [2014] EWCA Civ 839, Lord Dyson MR, Sullivan and Patten LJ

Sullivan LJ held that paragraph 89 of the NPPF had to be interpreted in its statutory context, which distinguishes between operational development and change of use. [38]

References in national policy to “buildings”, or “the construction of new buildings”, do not include mobile homes. [39]

New Forest DC v Owen [2013] EWHC 265 (QB), Judge Thornton QC

Paul Brown QC appeared as Leading Counsel for the Council

The Green Belt policies in the NPPF can require consideration of temporary use of sites. [198]

Timmins v Gedling DC [2015] EWCA Civ 10, Richards and Tomlinson LJJ, Mitting J

Paul Brown QC appeared for the Claimants

Paragraph 89 is concerned with new buildings, and not with other types of development. [30]

“Paragraph 89, as its opening sentence makes clear, lays down a general rule that the construction of new buildings in the Green Belt is inappropriate development: “building” for this purpose has the wide meaning given by section 336 of the Town and Country Planning Act 1990 (see paragraph 7 above). The various bullet points are exceptions to that general rule and are therefore likewise concerned only with the construction of new buildings. Thus the second bullet point covers the construction of a building (for example, a café) as an appropriate facility for an existing cemetery, but it does not cover a material change in the use of land so as to create a new cemetery.” [30]

Tandridge DC [2015] EWHC 2503 (Admin), David Elvin QC
“It is common ground here that the meaning of the replacement building exception should be approached in a similar manner to the earlier manifestation of the exception considered in R (Heath and Hampstead Society) v Camden LBC [2008] 2 P&CR 13.” [18]

“Here the apparently simple question is whether “building” should be understood as meaning only a single building and excluding any group of two or more buildings. I agree that this term, and its role as an exception to the general principle that new buildings are inappropriate development in the Green Belt, should be considered in its context of the NPPF as a whole and in the context of the Green Belt policies in particular” [33]

“However, while noting the change in language from PPG2, the exception under consideration here is still found in the NPPF, and all parties urged me to adopt the same approach in respect of the “not materially larger” test as was endorsed in the Heath and Hampstead case with regard to paragraph 3.6 of PPG2.

I agree that this is the appropriate approach, because it appears to me that the exceptions, though modified, generally replicate those in PPG2 and more importantly the underlying purpose of this exception does not appear to me to have changed. This is not a case like Timmins where the court is being asked to imply a category of appropriate development omitted from the NPPF, but concerns the interpretation of a category of appropriate development which has been included, and is broadly similar to its predecessor.” [42]-[43]

Turner [2016] EWCA Civ 466, Arden, Floyd and Sales LJ

The Inspector stated at para. 11 ‘Openness is essentially freedom from operational development and relates primarily to the quantum and extent of development and its physical effect on the appeal site.’

“I should mention that although in paras. 11 and 12 of the decision the Inspector referred to “operational development” rather than simply “development”, the judge correctly found that this was an immaterial slip and there is no appeal in that regard” [9]

“14 The concept of “openness of the Green Belt” is not narrowly limited to the volumetric approach suggested by Mr Rudd. The word “openness” is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.

* The question of visual impact is implicitly part of the concept of “openness of the Green Belt” as a matter of the natural meaning of the language used in 89 of the NPPF. I consider that this interpretation is also reinforced by the general guidance in paras. 79-81 of the NPPF, which introduce section 9 on the protection of Green Belt Land. There is an important visual dimension to checking “the unrestricted sprawl of large built-up areas” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. **Openness of aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness.** The preservation of “the setting … of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields. Again, the reference in para. 81 to planning positively “to retain and enhance landscapes, visual amenity and biodiversity” in the Green Belt makes it clear that the visual dimension of the Green Belt is an important part of the point of designating land as Green Belt.

16. The visual dimension of the openness of the Green Belt does not exhaust all relevant planning factors relating to visual impact when a proposal for development in the Green Belt comes up for For example, there may be harm to visual amenity for neighbouring properties arising from the proposed development which needs to be taken into account as well. But it does not follow from the fact that there may be other harms with a visual dimension apart from harm to the openness of the Green Belt that the concept of openness of the Green Belt has no visual dimension itself.
17 Mr Rudd relied upon a section of the judgment of Green J sitting at first instance in R (Timmins) v Gedling Borough Council [2014] EWHC 654 (Admin) at [67]-[78], in which the learned judge addressed the question of the relationship between openness of the Green Belt and visual impact. Green J referred to the judgment of Sullivan J in R (Heath and Hampstead Society) v Camden LBC [2007] EWHC 977 (Admin); [2007] 2 P&CR 19, which related to previous policy in relation to the Green Belt as set out in Planning Policy Guidance 2 ("PPG 2"), and drew from it the propositions that “there is a clear conceptual distinction between openness and visual impact” and “it is therefore wrong in principle to arrive at a specific conclusion as to openness by reference to visual impact”: para. [78] (Green J's emphasis).

The case went on appeal, but this part of Green J's judgment was not in issue on the appeal: [2015] EWCA Civ 10; [2016] 1 All ER 895.

18 In my view, Green J went too far and erred in stating the propositions set out in this section of his judgment should not be followed. There are three problems with it. First, with respect to Green J, I do not think that he focused sufficiently on the language of section 9 of the NPPF, read as part of the coherent and self-contained statement of national planning policy which the NPPF is intended to be. The learned judge does not consider the points made above. Secondly, through his reliance on the Heath and Hampstead Society case Green J has given excessive weight to the statement of planning policy in PPG 2 for the purposes of interpretation of the NPPF. He has not made proper allowance for the fact that PPG 2 is expressed in materially different terms from section 9 of the NPPF. Thirdly, I consider that the conclusion he has drawn is not in fact supported by the judgment of Sullivan J in the Heath and Hampstead Society case.” [14-18]

“The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there. But, as observed above, it does not follow that openness of the Green Belt has no visual dimension.” [25]

“It was rational and legitimate for [the Inspector] to assess on the facts of this case that there is a difference between a permanent physical structure in the form of the proposed bungalow and a shifting body of lorries, which would come and go; and even following the narrow volumetric approach urged by the appellant the Inspector was entitled to make the assessment that the two types of use and their impact on the Green Belt could not in the context of this site be “directly compared as proposed by the appellant” (para. 13). The Inspector was also entitled to take into account the difference in the visual intrusion on the openness of the Green Belt as he did in para. 14.” [27]

LB Bromley [2016] EWHC 595 (Admin), David Elvin QC

‘In my judgment, it is unnecessary to gloss the paragraph 89 exceptions and they should be read naturally and in the context that it is part of the statutory planning code that permission for new buildings always carries with it permission for the use of the buildings. The paragraph 89 exceptions can only be concerned with the use of new buildings, since the exceptions must all involve new buildings of some description. To include changes of use with respect to those new buildings does not involve contradicting the judgment of Timmins since it was concerned with whether there was a unstated general category of appropriate development comprising a material change of use of land. …

It goes too far to extend the reasoning of the Court of Appeal in Timmins, concerned as it was with whether material changes of use comprised a category of appropriate development, to apply it to the paragraph 89 exceptions when the Court's reasoning was closely based on the fact that what was appropriate development was what was set out in the NPPF and the NPPF made no provision for a material change of use as a freestanding category of appropriate development. There was nothing inherent in the concept of a material change of use which led the Court in Timmins to consider that it was not suitable in principle to be appropriate development. Indeed given that there had been such a category in the former PPG2 demonstrates otherwise. The point was, put at its simplest, that what is appropriate development is what is set out in the NPPF and the NPPF does not make provision for a general category of material change of use which preserves openness.’ [36]-[37]

‘It follows that, in my judgment, providing the new buildings fall within the use and other restrictions of the applicable indent of paragraph 89 the mere fact that permission for a new building may also involve a material change of use does not mean that it ceases to be appropriate development. This is a matter of the construction of language and purpose of the paragraph and that to interpret it according to that meaning and purpose appears to me to be consistent with a straightforward reading of it. Contrary to Miss Grogan's submission, it simply does not bring in via the back door the
general material change of use of land category rejected in Timmins. The only changes of use permitted in paragraph 89 are those arising from the new buildings defined as appropriate under it and in accordance with the conditions there set out.” [47]

Davis [2016] EWHC 274 (Admin)

HHJ Cooke considered whether there was a “general test” that development is appropriate so long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within the Green Belt. Referring to Timmins at [31]:

‘Neither Mitting J nor Tomlinson LJ therefore expressed a view as to whether there was any "general test" such as Richards LJ had rejected. But the clear inference must be that they did not consider that there was any such test, since if there had been it would have been relevant to the outcome of the case. The cemetery had been agreed not to affect openness; if it was to be presumed not to be inappropriate for that reason the appeal should have succeeded. Further, none of the judges in the Court of Appeal disagreed with Green J’s conclusion that prima facie all development in the Green Belt is to be regarded as inappropriate unless within the stated exclusions. The only scope for expanding the list of exclusions left open is development complying with the positive obligations in para 81.’ [66]

R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy,

Underhill, Lindblom LJ

“ Implicit in the policy in paragraph 89 of the NPPF is a recognition that agriculture and forestry can only be carried on, and buildings for those activities will have to be constructed, in the countryside, including countryside in the Green Belt. Of course, as a matter of fact, the construction of such buildings in the Green Belt will reduce the amount of Green Belt land without built development upon it. But under NPPF policy, the physical presence of such buildings in the Green Belt is not, in itself, regarded as harmful to the openness of the Green Belt or to the purposes of including land in the Green Belt. This is not a matter of planning judgment. It is simply a matter of policy. Where the development proposed is an agricultural building, neither its status as appropriate development nor the deemed absence of harm to the openness of the Green Belt and to the purposes of including land in the Green Belt depends on the judgment of the decision-maker. Both are inherent in the policy.

If the policy in the first sentence of paragraph 88 of the NPPF meant that “substantial weight”

must be given to the effect a proposed agricultural building would have on the openness of the Green Belt and on the purposes of including land within the Green Belt, the policy in paragraph 89 categorizing such buildings as appropriate development in the Green Belt, regardless of such effects, would be negated. This cannot have been the Government’s intention.” [20]-[21]

R (Boot) v Elmbridge Borough Council [2017] EWHC 12 (Admin), Supperstone J

Andrew Parkinson appeared for the Claimant

Neil Cameron QC and Zack Simons appeared for the Defendant

The Officer Report found that there was an impact upon the openness of the Green Belt, but concluded that “the proposal represents appropriate development within the Green Belt. The proposal is not considered to have a significant adverse impact on the openness of the Green Belt or the amenity of nearby properties.” The Council therefore approved the application for planning permission without applying the ‘very special circumstances’ test.

This decision was quashed as being unlawful.

“It seems to me that the general policy approach to development in an area of Green Belt is clearly set out in paragraphs 89 and 90. That approach is different, dependent upon whether the proposed development is in principle inappropriate or in principle not inappropriate (i.e. in principle appropriate). The former includes both the construction of new buildings other than those that fall within the exceptions in paragraph 89; and, because the paragraph 89 and 90 lists are closed, also any development not listed in the bullet points in either of those paragraphs. The latter includes both new buildings which fall within any of the paragraph 89 exceptions; and development which falls within any of the paragraph 90 listed categories, even if, in either case, to fall within the category, the development has to satisfy additional criteria such as the preservation of the openness of the Green Belt and that the development does not conflict with the purposes of including land in the Green Belt. It is noteworthy that those two particular criteria feature both generically in paragraph 90, but also specifically in the second bullet point exception in paragraph 89 (“provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it”). In my view, this illustrates the similarity of approach to the bullet point exceptions in paragraph 89, and the development considered not inappropriate as listed under paragraph 90.” [14]

“For the reasons I have set out (in paragraph 14 and following above), I do not accept Mr Village's submission that both paragraph 89 and paragraph 90 start from the same general proposition that development in the Green Belt is inappropriate. In my view – and, on my understanding of their submissions, this is not exactly as either Ms Lieven or Mr Easton put it– the relevant policy distinction is not between paragraphs 89 and 90 as such, but rather between, on the one hand, proposed development that is in principle inappropriate, and, on the other hand, proposed development that is in principle not inappropriate. This was the distinction crisply drawn by Lindblom LJ in Lee Valley (see paragraphs 19-20 above). As I have described (in paragraph 14 above), the former includes both the construction of new buildings other than those that fall within the exceptions in paragraph 89; and, because the paragraph 89 and 90 lists are closed, also any development not listed in the bullet points in either of those paragraphs. The latter includes both new buildings which fall within any of the paragraph 89 exceptions; and development which falls within any of the paragraph 90 listed categories, even if, in either case, to fall within the category, the development has to satisfy additional criteria.” [48]

“Mr Village submitted that, as a result of the principles set out in Turner, in considering openness, a planning decision-maker is obliged to take into account visual impact of the proposed development. However, that is not what Turner held. The case concerned whether the inspector had erred in taking into account visual impact of the development. Both Lang J and the Court of Appeal held, not that he was obliged to take visual impact into account, but only that, in the circumstances of the particular case, he was entitled to do so. The judgment of Sales LJ is particularly clear in this regard.” [51]

“I appreciate, of course, that the proper interpretation of the NPPF is a matter of law for the court to determine. However, given that we are dealing with (to use Sales LJ's epithet) an “open-textured” concept, in a policy for the guidance of planning decision-makers, I am persuaded by Ms Lieven's submission that factors such as visual impact, purpose, and degree of permanence and reversibility, are not matters to which, as a matter of law, a planning decision-maker must have regard in every case in which a proposed development is in a Green Belt area, or even in every such case in which openness is an issue. They are (as Ms Lieven put it) “CREEDNZ factors”, a reference to CREEDNZ Inc v Governor-General [1981] 1 NZ 172 at page 183 per Cooke J, as approved in In re Findlay [1985] AC 318 at pages 333H-334C per Lord Scarman. They are factors to which the decision-maker may have regard if, on the facts of the particular case, in the exercise of his judgment and discretion he thinks it right to do so: in other words, the decision-maker has a margin of appreciation within which he may decide just which considerations should play a part in his reasoning process (see R v Somerset County Council ex parte Fewings [1995] 1 WLR 1037 at pages 1049H-1050A per Simon Brown LJ). In deciding which considerations should play a part, the decision-maker must of course be guided by the policy looked at as a whole, including its broad objects; but, once he has made that decision, this court will only interfere, on conventional public law grounds, if he strays outside that margin (R (Plant) v London Borough of Lambeth [2016] EWHC 3324 (Admin) at [62]-[63] per Holgate J, and the cases to which he there refers).” [58]

Europa Oil and Gas [2014] EWCA Civ 825

Stephen Whale appeared for the Leigh Hill Action Group

The meaning of “mineral extraction” in paragraph 90 should be interpreted consistently with the meaning of the word later in the NPPF. Later paragraphs lean in favour of “mineral extraction” meaning exploration as well as production. [16]
Timmins v Gedling DC [2015] EWCA Civ 10, Richards and Tomlinson LJJ, Mitting J

Paul Brown QC appeared for the Claimants

Richards LJ and Mitting J differed on the question of whether NPPF 90 should be regarded as a closed list. Tomlinson LJ preferred not to express a firm view on the question, it not being necessary to determine on the facts.

R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin), Ouseley J

“I would accept that the effect of development on openness may involve questions of degree. and that there may be scope for some reduction in height and bulk offsetting some greater extent or spread of built area, and, if so, that how far the offset goes before the impact on openness increases can be a matter of impression. A conclusion on the degree of impact on openness is essential to reliance on the new flexibility for “previous developed land” in the first place … and to the analysis of harm.” [59]

Turner [2015] EWHC 2728 (Admin), Lang J

Sasha Blackmore appeared for the Secretary of State

““Openness” is not defined in the NPPF. The Inspector, at paragraph 11, described it as “essentially freedom from operational development”. I agree with the Claimant that the meaning of openness is freedom from any development, not just operational development. However, in my view, this was a slip by the Inspector which did not materially affect his reasoning, so as to give rise to an arguable ground of appeal. It is apparent from paragraph 79 of the NPPF that openness is an “essential characteristic” of the Green Belt which the policy protects.” [26]

“The Claimant submits that the Inspector wrongly elided the concept of openness with the concept of visual impact in paragraph 14. These are two different concepts, though often closely related…” [33]

R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy,

Underhill, Lindblom LJJ

“There is no difference between the concept of development being not “inappropriate” and the concept of its being “appropriate”” [8]

Smith [2017] EWHC 2562 (Admin), Sir Ross Cranston

Richard Turney appeared for the Claimant

Zack Simons appeared for the Secretary of State

“I cannot accept that in the light of Sales LJ cogent analysis [in Turner] the concept of openness is confined to the visual impact arising from buildings. Indeed, that is clear from Turner (supra) itself, when the impact on existing openness of the vehicles and so on around the site were taken into account. Even if the visual impacts the inspector identified in this case could not be said to be part of the development, that did not mean that they were to be ignored. The NPPF does not require an inspector to disaggregate the impacts of non- development features from the impacts of proposed development more generally.” [30]

APPENDIX 3 – Settlement Profiles Report

13.1 Guildford urban area

Size

Guildford urban area has a population of approximately 73,779 (just over half of the total population in the borough) and is located in the centre of the borough. It is one of two principal urban areas in Guildford borough.
Form

Guildford urban area contains a range of different forms

Character

It is important to note that the Guildford urban area is dissected by the strategic road network (A3) and rail infrastructure forming barriers to movement. As a result the urban wards to the north and north west of the borough are poorly connected to the rest of the Guildford urban area and town centre, where the majority of the services and facilities are located, due to limited crossing locations.

Economic and social sustainability indicators

Community services and facilities

Guildford urban area is well equipped with social and community facilities, it offers all of the community facilities and services assessed, and offers more leisure facilities including the Spectrum leisure centre. Northern (sic.)

Retail and employment

The town centre and 22 local shopping centres provide a broad range of goods and services to the local community.

Guildford urban area is home to the University of Surrey and Surrey Research Park. There is also Guildford College and the College of Law. They are important in not only generating a supply of well qualified personnel but also in establishing and facilitating the formation of a number of new businesses. Guildford urban area contains some of the borough’s key employment sites that include the Surrey Research Park, Guildford Business Park, Slyfield Industrial Estate and Woodbridge Meadows. Together these provide premises for a varied cross section of businesses from manufacturing through to high knowledge based industries.

Three urban wards, two in the town centre and one adjacent to the A3, account for the majority of employment. Retail and transport are predominantly located in urban areas. There are two large edge-of-town supermarkets. Manufacturing jobs are predominantly located in the urban wards of Friary and St Nicolas, Onslow and Stoke Guildford borough Settlement profiles 39 whilst construction and transport jobs are concentrated in the urban wards of Friary and St Nicolas, Stoke and Merrow.

Transport

Residents within Guildford urban area have access to a range of transport options. The River Wey runs through the town centre and acts as a transportation route primarily for recreation and tourism purposes. Guildford mainline railway station is located within the town centre and provides excellent connectivity to London, Portsmouth, Reading, Gatwick Airport and many other destinations. The second railway station is located to the north of the town centre away from the main shopping areas but also provides excellent connectivity. The main road that links Guildford urban area with London and Portsmouth is the A3. This contributes to the congestion issues in the town. There are frequent bus services into and out of Guildford town centre and the wider urban area.

Given the significant concentration in employment and the reliance of both residents and businesses on the private vehicle, the urban area suffers from traffic congestion during peak hours. The northern A320 corridor into Guildford urban area from Woking, past the Slyfield Industrial Estate and along the A322 Worplesdon Road, becomes heavily congested at peak times. The Stoke crossroads and junction with the A3 are already at their capacity. A lack of investment in associated junctions will continue to have an adverse effect on the communities and major businesses operating in the Guildford urban area. In addition to investment in roads and junctions, there is also a need for more investment in sustainable transport, including improvements to walking, cycling and public transport in the borough.

Environmental sustainability indicators
Further information

- There are 268 Listed Buildings within Guildford urban
- Flood zones 2 and 3 associated with the River Wey run south to north through the urban area and town centre affecting some
- There are several conservation areas within Guildford urban
- The area lies within the 400m-5km buffer zone of the Thames Basin Heaths Special Protection Area (SPA).
- There are three areas of High Archaeological potential, one to the south and two to the south
- An Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value (AGLV) lie to the south of Guildford urban

Conclusion

Guildford is designated as an urban area and contains a high level of services. As such it could support a level of development which exceeds that of any of the borough’s other settlements. If suitable sites are found, there is the option to extend the urban area to enable more development however this may lead to development away from key services. The sustainability of any extension should be assessed in more detail through other evidence base studies. This will include further work to assess the level of infrastructure needed to support the level of growth.

Julian Lyon

Attached documents:

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Comment: MM4 - LPMM18/3140  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 4&5 – Policy H1 (Homes for All)

Whilst the main modifications made to Policy H1 itself are acceptable to the Society, we remain concerned that this policy still does not deal adequately with affordable homes, and we believe that, for a University Town, the policy for HMOs, Paragraph (7), is not sufficient to prevent harm to neighbourhoods where large proportions of homes are given over to students, affecting the character of those neighbourhoods, especially during university vacation times.

At the end of Paragraph (1), we would like to add “…including affordable homes in accordance with Policy H2”.

Attached documents:
Comment: MM5 - LPMM18/3141  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 4&5 – Policy H1 (Homes for All)

Whilst the main modifications made to Policy H1 itself are acceptable to the Society, we remain concerned that this policy still does not deal adequately with affordable homes, and we believe that, for a University Town, the policy for HMOs, Paragraph (7), is not sufficient to prevent harm to neighbourhoods where large proportions of homes are given over to students, affecting the character of those neighbourhoods, especially during university vacation times.

At the end of Paragraph (1), we would like to add “…including affordable homes in accordance with Policy H2”.

Attached documents:

Comment: MM6 - LPMM18/3142  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 6 – Policy H2 (Affordable Homes)

The Society broadly accepts the amendments to this policy but has some reservations.

Paragraph (4a) is not quite right, nor is it complete enough. We would prefer this to read: “If developers, acting objectively and reasonably, satisfactorily demonstrate that the provision of the amount of affordable housing required by this policy would not be economically viable, such demonstration to be available for scrutiny by the Council and the public, the Council will consider the following to assist with delivering a proposed development:

- varying the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size and/or type of homes to be provided; and/or
- reducing the overall number of affordable homes; or

(c) at the Council’s sole discretion, accepting a contribution to the provision of affordable housing elsewhere in the Borough;

all subject to the proviso that there will be clawback provisions whereby the developers provide additional contributions or make additional provision of affordable homes if the development returns exceed those in the viability assessment.”

Paragraph 4.2.38 seems to be adequate, although the Council may wish to make some adjustments to accommodate our comments on Policy H2 itself.

Monitoring Indicators

The number of new-build affordable home approved needs to have reference to the changes made to the threshold of ten homes for affordable housing obligations to apply. This should perhaps limit the indicator to schemes of more than ten homes.

Attached documents:

Comment: MM7 - LPMM18/3143  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:
Main Modification 7 – Policy H3 (Rural Exception Homes)

The Society has no particular comment on the modifications to this policy.

Attached documents:

Comment: MM8 - LPMM18/3144  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 8 – Policy P1 (AONB)

The Society has no objection to amendments to Monitoring Indicators.

Attached documents:

Comment: MM9 - LPMM18/3145  Respondent: The Guildford Society (Mr Julian Lyon) 8561377  Agent:

Main Modification 9 – Policy P2 (Green Belt)

We do not agree the specific wording of the last sentence of paragraph (1) of the policy itself. We would prefer this either to be deleted or for it to be less ambiguous. Something along the lines of: “Very special circumstances will not exist where the potential harm to the Green Belt, its openness and its permanence, is not substantially outweighed by other material considerations and where the development could not reasonably be accommodated on non-Green-Belt land.”

The amendments at Paragraphs (2)(a) and (2)(b) are generally acceptable to the Society.

At 2(c) the limited infilling must not be done in such a way as to extend villages through a loophole.

Paragraph (3a) is vague and contains a double negative and should be reworded to: “Certain other forms of development (description or test required) are also not considered to be inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of the Green Belt as listed in the NPPF.

The deletions of paragraphs 4.3.21 and 4.2.23 are generally acceptable to the Society.

The additional text at Paragraph 4.3.25 is inconclusive and vague and, because it is basically an incomplete list, it neither protects nor explains anything.

Monitoring Indicators

The target should, realistically, be zero as there is a general default against development in the Green Belt.

Generally

The Council has not satisfactorily applied its own settlement hierarchy (as demonstrated in the Sustainability Appraisal), and this sets a poor example and a very low threshold for a Very Special Circumstances test by comparison.

Due to the updated housing numbers, we do not believe the case has been made appropriately or conclusively for releasing land from the Green Belt. Consequently, we consider the Plan is unsound.
Comment: MM3 - LPMM18/1306  Respondent: Ms Christine Hetherington 8562113  Agent:

I wish to submit representations in relation to main modification MM3.

I regard these modifications as still leaving the Local Plan unsound in that:

1. The Council has not properly adhered to the obligation to give priority of consideration to development on brownfield sites - particularly in the Town Centre.

2. The Modifications rely heavily on A3 planned improvements, but these are within the powers of Highways England, not GBC.

3. Town Centre policy S3 remains inadequate and does not address the infrastructure deficit.

4. The housing numbers on which housing development is based does not reflect the latest ONS figures and projections.

For the above reasons I submit that the public hearings should be re-opened to allow re-examination of these issues.

Attached documents:

Comment: MM13 - LPMM18/6027  Respondent: C Sheard 8562561  Agent:

MM13 Retail Needs

The retail needs figures are revised to show an increase in net capacity to 2030 of 28,202 m². This flies in the face of all projected retail trends, in particular the increases in online shopping and shows the Council have not done a proper analysis of future requirements. They risk therefore sterilising land with unrealistic allocations and demands. The retail requirements should therefore be reduced.

Attached documents:

Comment: MM2 - LPMM18/6025  Respondent: C Sheard 8562561  Agent:

MM2 Policy S2 Planning for the Borough- our spatial development strategy

I object most strongly to the increase in housing numbers proposed to contribute towards Woking Borough Council’s unmet needs. The latest ONS projections released in September 2018 show a considerable reduction on the figures released earlier on which presumably this Plan is based. The difference between the latest and earlier figures risks rendering the whole Plan unsound and totally undermines the Council’s case for infringing on the Greenbelt. Rather than being increased, the overall housing need should be reset to a figure closer to the ONS projections say around 330 dwellings per annum which would still give the Council a contingency of 10% or so above the actual projected need of ca 300 households per year which would give the Council some breathing space for any years in which it fell short of its target.
**Comment: MM25 - LPMM18/6029  Respondent: C Sheard 8562561  Agent:**

**MM25 Policy D3 Historic environment**

I object most strongly to the watering down of Policy Paragraph 2 which contradicts all the additional hoops and incurred costs which those living in Listed Buildings and Heritage Assets are obliged to go through / bear which according to the rewording will now be undermined by inappropriate development on adjacent land.

**Attached documents:**

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**Comment: MM41 - LPMM18/6030  Respondent: C Sheard 8562561  Agent:**

**MM41 Policy A43 Land at Garlicks’ Arch, Send March**

This has increased from 400 to 550 homes, of which 450 are to be built in the first 5 years. This increase of 37% in the number of homes is excessive and if the outline plans shown at the Local Plan Examination are anything to go by will breach many of the other policies contained within the Local Plan regarding new sites reflecting the Local Character. It also ignores the 6000 plus objections to the previous proposal. The land is currently Green Belt and includes Ancient Woodland, which should have protected status under both the previous and current NPPFs and there would be no need for any incursion into the Green Belt were the Local Plan to be re-visited in light of the new housing requirements figures issued in September 2018 as outlined above.

The inclusion of this site seems to be driven by the Councils desire to expend the Bunt Common Junction with the A3 to a full four-way Junction which Highways England appear to be of the view cannot be delivered within the Safety Standards in their Manuals. Resolving this issue will render it impossible to deliver the proposed 450 houses within the first five years since otherwise the increased traffic on local roads will be intolerable and cost lives! The site is not suitable for housing local school and medical facilities will not cope.

**Attached documents:**

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**Comment: MM41 - LPMM18/6033  Respondent: C Sheard 8562561  Agent:**

**MM41 Transport Strategy**

The Local Plan is proceeding with inadequate traffic modelling that understates the roads infrastructure requirements that will be generated by its excessive housing number and site selection.

**Attached documents:**

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**Comment: MM42 - LPMM18/6031  Respondent: C Sheard 8562561  Agent:**
MM42 Land at Burnt Common

This proposal has increased from 7000 to 14800 sq m of industrial and storage facilities – this has been increased twice, having been previously deleted from the 2014 plan. It has now doubled the area. It is by far the largest new industrial allocation in any village. There is unused industrial capacity at Slyfield and the Send Business Centre so there is no need to site development land in the Green Belt. The Employment Land Needs Assessment showed a reduction in demand for industrial land, and this allocation is on top of a 25% increase proposed at Send Business Centre. There is more concentration of industrial units in Send than in any other village. The narrow village roads will not cope and this will affect air quality adversely.

Attached documents:

Comment: MM44 - LPMM18/6035  Respondent: C Sheard 8562561  Agent:

MM44 Site at Aldertons Farm Send Marsh Road

This new site for 120 homes was deleted from an earlier draft. It is a Green Belt site and no exceptional circumstances have been demonstrated; it is adjacent to an Ancient Monument and a collection of Listed Buildings which date back almost 600 years (of which Aldertons is one). Listed Buildings Permission is supposed to apply to their curtilage as well as the buildings themselves and whilst the site may not be in the immediate curtilage of Aldertons it is certainly within the general curtilage thereof. Moreover, considering the revised figures issued by the ONS in September 2018, this site is unnecessary and as with the Garlick’s Arch Site, local facilities will not bear the increase in population implied. I object most strongly to the re-introduction of this site, and note that their was no detailed discussion of its inclusion allowed by the Inspector during the examination of the Local Plan.

Attached documents:

Comment: MM9 - LPMM18/6026  Respondent: C Sheard 8562561  Agent:

MM9 Policy P2 Green Belt

I welcome the statement that “The Metropolitan Green Belt, as designated on the Policies Map, against inappropriate development in accordance with the NPPF. Inappropriate development will not be permitted unless very special circumstances can be demonstrated. “ I would point out however that the revised ONS housing figures issued in September 2018, would allow Guildford Borough Council to avoid building on the Metropolitan Green Belt entirely!

Attached documents:

Comment: MM51 - LPMM18/6267  Respondent: West Horsley Parish Council (Sam Pinder) 8563201  Agent: Colin Smith Planning Ltd (Colin Smith)

2.9

Notwithstanding that WHPC object to the policy of insetting their village (and others) from the Green Belt, the MM boundary change on the published Consultation map for West Horsley is noted, following GBC recognition that the
previous boundary was non-defensible. If the village is to be inset, then this proposed change is welcomed.

2.10

In addressing this point, the Inspectors attention is drawn to a number of discrepancies in the proposed inset boundary defining the Green Belt around West (and East) Horsley. This matter was raised at the hearing on this topic on 05.07.18. The Inspector invited West and East Horsley Parish Councils to discuss this matter at a meeting with Guildford Borough Council to review the boundaries and deficiencies in the insetting justification provided within the Green Belt & Countryside Study. However, when efforts were made to arrange such a meeting, it was refused by the Council on the grounds of being unnecessary (please see the email exchange set out at Appendix 1). It is the Parish Council’s view that the Borough Council have been uncooperative and unhelpful throughout the Local Plan process, and their approach to this issue is another example of their complete lack of engagement with West Horsley Parish Council.

Attached documents:

Comment: MM27 - LPMM18/556  Respondent: Mr David Gianotti 8565153  Agent:

MM27 MM41 MM42 and MM48

• Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and
• No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/553  Respondent: Mr David Gianotti 8565153  Agent:

I find it both frustrating and disappointing that I need to write once again to object to the latest series of proposals.

Below you will see just some of my comments and thoughts:

MM41

• This land is Green Belt and contains ancient woodland that needs to be preserved;
• Results in significant over development to an area I have lived in for many years for its space, quiet and rural attraction;
• The estimated 800 extra cars will result in gridlock; and
• GP surgeries, schools and hospitals will be strained to breaking point.

Attached documents:

Comment: MM41 - LPMM18/557  Respondent: Mr David Gianotti 8565153  Agent:

MM27 MM41 MM42 and MM48

• Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and
• No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/554  Respondent: Mr David Gianotti 8565153  Agent:

MM42

• Surely there can be no justification for another industrial site in the Green Belt when Slyfield has spare capacity;
• The traffic at peak times on narrow surrounding roads will come to a stand still; and
• Nitrogen dioxide levels in our area are already considered dangerous.

Attached documents:

Comment: MM42 - LPMM18/558  Respondent: Mr David Gianotti 8565153  Agent:

MM27 MM41 MM42 and MM48

• Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and
• No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/555  Respondent: Mr David Gianotti 8565153  Agent:

MM44

• Detracts from the heritage buildings in the area;
• This is Green Belt and contradicts policy MM9;
• Extra traffic will place more pressure on the Send Crossroads; and
• An extra 770 houses (if you include surrounding proposals) is just too much for the existing infrastructure.

Attached documents:

Comment: MM48 - LPMM18/559  Respondent: Mr David Gianotti 8565153  Agent:

MM27 MM41 MM42 and MM48

• Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and
• No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Please do take these comments seriously and don't allow our rural community to be destroyed!

Attached documents:

Comment: MM2 - LPMM18/5982  Respondent: Cobham Conservation and Heritage Trust (David Bellchamber) 8565217  Agent:

Submission Local Plan: Strategy and Sites

The Trust writes to comment on the current form of the Local Plan to say that it considers it to be unsound (including with the modifications suggested). Among the relevant points are that:

1. The housing numbers need to reflect the latest ONS figures and projections which are substantially reduced from those used for the examination, not only for Guildford Borough Council but also for Woking Borough Council.

2. The council has not properly observed its own hierarchy of development. The Plan has placed too much reliance in developing sites in the Green Belt and other places in the borough before sufficiently taking into account opportunities for using brownfield sites, and the huge potential for development in the town centre of Guildford, especially when the future change of uses from the likes of retail and office to residential is considered. The result is that there are not the exceptional circumstances to warrant the taking of land out of the Green Belt for many if not all the areas suggested in the Plan.

3. There is insufficient consideration of infrastructure requirements to support proposals and in particular too much reliance on improvements to the A3 for which clear commitments for projects and funding are needed from Highways England and are therefore beyond the council’s control.

4. The view of the Trust is that the public hearings should be re-opened to allow re-examination.

Attached documents:

Comment: MM2 - LPMM18/3206  Respondent: Tyting Society (David Thorp) 8565601  Agent:

The Tyting Society is a Residents Association representing 88 households, some 2 kilometres from the centre of Guildford, and sited in AONB land. Our particular concerns relate to MM2 and MM3, which are outlined below.

The scale of the increase in housing included in the plan would have an important impact deleterious on our local Tyting area, which is accessed by two narrow single tracked lanes. Increased traffic will be difficult to handle without loss of their existing character.

We ask that the housing target be reduced, for the reasons set out below. We are also concerned about the specific development proposed at Hornhatch Farm in Chilworth, just south of our area (MM43)

MM2 - policy S2. The examination should be re-opened because the housing figures should be revised in the light of the new ONS forecasts of population and households. The stated housing requirement is not a sound basis for the Local Plan or justification for such an extensive loss of Green Belt land.
MM2 - there is a strong case for taking out a strategic site and more scope for better town centre provision. This makes table (S2), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 - independent expert, Neil MacDonald, has demonstrated that 360 homes per year would support the ambitious economic growth rate proposed by the Inspector. 630 homes a year is out of step with the new ONS figures and the Government's new standard methodology. 630 is based on inappropriate assumptions that inflate the figures due to excessive allowance for student homes and their low economic participation.

MM2 - it is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained. The number of houses needed in Woking has also been reduced and has also not been re-examined.

Attached documents:

Comment: MM3 - LPMM18/3207  Respondent: Tyting Society (David Thorp) 8565601  Agent:

MM3 - policy S3. Guildford Borough Council must deliver real and co-ordinated results. The Guildford town centre must be designated a strategic site or sites.

MM3 - policy S3. Guildford Borough Council should adopt the Guildford Vision Group proposals, including a new crossing or equivalent effective alternative so as to deliver a safer pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM43 - LPMM18/3208  Respondent: Tyting Society (David Thorp) 8565601  Agent:

MM43 - Hornhatch Farm, Chilworth. As set out in MM2 above the much lower projection of housing needs removes the necessity to bite into the Green Belt and the development of this site.

Attached documents:

Comment: MM41 - LPMM18/1252  Respondent: Mr David W Lazenby 8566049  Agent:

1. Item MM 41

The previous version of the plan Included some 400 houses, which was excessive for this village and not properly justified. To increase this to 550 is astonishing. The land is Green Belt, which should, be protected. The infrastructure is already over-loaded. At present we sometimes have to wait 4 or 5 minutes to drive out of Sanger Drive onto Send Road. In busy times, particularly in the evening rush (5.00 to 6.15 pm) and traffic towards Woking queues for half a mile into Old Woking. The social infrastructure of medical surgeries, schooling and places for people to meet, would be overwhelmed. I OBJECT to this gross overdevelopment.

1. Items MM41, MM42, MM44, and MM9 and MM48
I OBJECT to the great concentration of development in and around the village of Send. It is neither sensible nor equitable to propose such enormous overloading of one village, when many could share any possible load.

**Comment:** MM42 - LPMM18/1256  **Respondent:** Mr David W Lazenby 8566049  **Agent:**

1. **Items** MM41, MM42, MM44, and MM9 and MM48

I OBJECT to the great concentration of development in and around the village of Send. It is neither sensible nor equitable to propose such enormous overloading of one village, when many could share any possible load.

1. **Item MM42**

The possible development of industrial Land at Burnt Common has apparently been in or out of planning policy for some time. There does not seem to have been justification for more than doubling the land usage here, when there is space available in other areas, including Slyfield and elsewhere around Guildford.

I OBJECT to the overdevelopment at Burnt Common.

**Attached documents:**

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**Comment:** MM44 - LPMM18/1253  **Respondent:** Mr David W Lazenby 8566049  **Agent:**

1. **Item MM44**

The land at Alderton’s Farm has been in and out of proposals, but with no proper justification for it being again re-inserted. The adjacent road has busy and dangerous junctions at both ends, with no hope of being able to cope with the traffic from an extra 120 houses!

I OBJECT to this development.

**Items** MM41, MM42, MM44, and MM9 and MM48

I OBJECT to the great concentration of development in and around the village of Send. It is neither sensible nor equitable to propose such enormous overloading of one village, when many could share any possible load.

**Attached documents:**

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**Comment:** MM48 - LPMM18/1258  **Respondent:** Mr David W Lazenby 8566049  **Agent:**

**Items** MM41, MM42, MM44, and MM9 and MM48

I OBJECT to the great concentration of development in and around the village of Send. It is neither sensible nor equitable to propose such enormous overloading of one village, when many could share any possible load.
Dear Sirs

I am writing in response to the modifications you propose to the development of the former Wisley Airfield. I think that the proposed modifications will still be to the detriment of the area and do not negate the results of the enquiry held last year.

To start with:

**The number of houses the Council is proposing for this site is wrong because it is based on outdated figures.** I believe that the hearing should be re-opened so that the latest ONS figures and household projections can be taken into account. These figures particularly need revision because they are allowing for meeting some of Woking’s unmet need. This should not be allowed because it will need the release of green belt land. The council is not following its own strategies which require that developments take place first in the town centre, the urban area and brownfield sites and only then to land in villages and green belt land.

**The modifications do not deal adequately with the problems of motorised transport in the area.** The delay in the improvements of J10 (the A3/M25 junction); A3 improvements at Guildford will cause real problems and these will have a negative effect on development in the area. The problems for other forms of transport ie cycling, walking, are not even acknowledged. This development will result in a huge increase in car use at a time when the government is proposing a reduction because of climate warming.

**The modifications reduce the size of the SNCI and yet the whole site qualifies on ecological grounds.** The biodiversity of the SNCI will be destroyed when there is rapidly increasing evidence that global warming and human life itself needs this diversity in order to continue.

**An Appropriate Assessment and Habitats Regulation Assessment have not been carried out.** This is in breach of case law.

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**Comment: MM2 - LPMM18/1776  Respondent: Mrs Diana Brighton 8566145  Agent:**

**Comment: MM40 - LPMM18/1697  Respondent: Mrs Diana Brighton 8566145  Agent:**
Comment: MM40 - LPMM18/1777  
**Respondent:** Mrs Diana Brighton 8566145  
**Agent:**  

The modifications do not deal adequately with the problems of motorised transport in the area. The delay in the improvements of J10 (the A3/M25 junction); A3 improvements at Guildford will cause real problems and these will have a negative effect on development in the area. The problems for other forms of transport ie cycling, walking, are not even acknowledged. This development will result in a huge increase in car use at a time when the government is proposing a reduction because of climate warming.

Comment: MM50 - LPMM18/1780  
**Respondent:** Mrs Diana Brighton 8566145  
**Agent:**  

The modifications reduce the size of the SNCI and yet the whole site qualifies on ecological grounds. The biodiversity of the SNCI will be destroyed when there is rapidly increasing evidence that global warming and human life itself needs this diversity in order to continue.

An Appropriate Assessment and Habitats Regulation Assessment have not been carried out. This is in breach of case law.

Comment: MM2 - LPMM18/5695  
**Respondent:** David Calow 8567105  
**Agent:**  

I have four main comments I would like to make on the local plan:

1. There is now so much doubt about the housing requirement that the plan will not have any local credibility unless the forecasts are properly and transparently reviewed.

Comment: MM3 - LPMM18/5696  
**Respondent:** David Calow 8567105  
**Agent:**  

2. The internet is rapidly changing shopping and delivery processes but the plan seems to assume the pre-internet world will just go on as before.
3. It seems there is no policy on building height for the town centre.
4. There is no plan to deal with the added congestion development brings beyond hoping other authorities will pay for very expensive new roads.

Attached documents:

Comment: MM2 - LPMM18/5335  Respondent: Miss Edwina Attwood 8568193  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:

2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.
I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/5353  **Respondent:** Miss Edwina Attwood 8568193  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.
MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/5347  Respondent: Miss Edwina Attwood 8568193  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5354  Respondent: Miss Edwina Attwood 8568193  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.
MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**

**Attached documents:**

---

**Comment:** MM32 - LPMM18/5358  **Respondent:** Miss Edwina Attwood  8568193  **Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

---

**Comment:** MM33 - LPMM18/5362  **Respondent:** Miss Edwina Attwood  8568193  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor **at Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

---

**Comment:** MM35 - LPMM18/5367  **Respondent:** Miss Edwina Attwood  8568193  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and **NOT** removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/5374  **Respondent:** Miss Edwina Attwood  8568193  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment</th>
<th>MM44 - LPMM18/5371</th>
<th>Respondent: Miss Edwina Attwood 8568193</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM44 The new Green Belt site at <strong>Send</strong> is not justified in view of the revised housing figures.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment</th>
<th>MM9 - LPMM18/5350</th>
<th>Respondent: Miss Edwina Attwood 8568193</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM9 In Green Belt, proposed limited <strong>infilling outside identified settlement</strong> boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment</th>
<th>MM2 - LPMM18/3761</th>
<th>Respondent: Effingham Village Plan (Jon Short) 8568225</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response from Effingham Parish Council to the Guildford Local Plan – Strategy and Sites – Main Modifications 2018</strong></td>
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<tr>
<td>Dear Sir or Madam,</td>
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<tr>
<td>Effingham Parish Council (EPC) thanks Guildford Borough Council (GBC) for the opportunity to comment on the main modifications to the Local Plan (LP), 2018. EPC has participated in the consultation process from the start and we had thought that that the plan, as it was before the examination in June/July, was broadly satisfactory and should have been acceptable to national planning authorities.</td>
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<td>We are, therefore, surprised that legislation allows for the LP process to pass to an unelected planning official to take control of the last critical modifications. We are particularly concerned that the planning official has the powers to:</td>
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<td>• Make a higher housing target.</td>
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<tr>
<td>• Demand a contribution to Woking’s unmet need.</td>
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<tr>
<td>We had understood that the Government planning processes required a greater amount of local involvement. This is what we had expected after completing and returning to GBC the many consultations and surveys into the LP over the last few years. We are particularly concerned to see that years of consultation between GBC and their residents can be overturned by an unelected official without any democratic redress. With regard to these two matters EPC:</td>
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<tr>
<td>1. objects to the new housing target which has increased beyond what was ‘agreed’ by GBC and its residents through previous consultations. We would ask, therefore, that the housing target be reduced to what it was previously.</td>
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<tr>
<td>2. objects to the contribution to Woking’s unmet need. This is the first time this has come up as a subject for consultation. Woking’s unmet housing need should be met by Woking, if not in their current LP then in the longer term. Is it not bizarre that Woking’s unmet need can be so easily shifted on to other authorities? Woking should meet its own need in full.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment</th>
<th>MM40 - LPMM18/3762</th>
<th>Respondent: Effingham Village Plan (Jon Short) 8568225</th>
<th>Agent:</th>
</tr>
</thead>
</table>
We also object to the former Wisley Airfield being considered for development at this stage and would ask that it is removed from being an inset site and a site selected for development. Following the Inspector’s comments when dismissing the Wisley planning appeal, he identified a number of very serious issues that have not yet been overcome or mitigated. It would seem appropriate to drop the former Wisley Airfield from being inset and as a development site until the serious problems identified by the Inspector have been overcome.

Attached documents:

Comment: MM13 - LPMM18/1937  Respondent: Mrs Fiona Curtis 8570273  Agent: Mrs Fiona Curtis

MM13

The retail figures are unrealistically high and should be downwardly reviewed.

Attached documents:

Comment: MM2 - LPMM18/1932  Respondent: Mrs Fiona Curtis 8570273  Agent: Mrs Fiona Curtis

MM2  Spatial development strategy and housing numbers

I would request that the Inspector takes into account the recent findings of Analyst, Neil MacDonald who has looked at Guildford’s ‘needs’ in light of the new ONS data using both old and new methodology. These findings suggest the housing target way exceeds the number needed even with an uplift to boost the economy and taking on Woking’s unmet need. The new data might also suggest that Woking no longer has an unmet need, in which case this should be removed along with Greenbelt sites. GGG has calculated an actual need of 301 new dwellings and GRA, of 360. A figure in that region would mean that development could be met using brownfield sites alone without the inclusion of Greenbelt/Greenfield sites for which there appears to be no demonstration of exceptional circumstances.

Tables S2a and S2b are out of date and should be reviewed.

Retail figures are too high, they must reflect National changes in shopping trends and High Streets must be designed to be more versatile, flexible and include a higher population of residents than is currently planned for to keep ensure the town thrives on all levels.

Attached documents:

Comment: MM23 - LPMM18/1938  Respondent: Mrs Fiona Curtis 8570273  Agent: Mrs Fiona Curtis

MM23 MasterPlan

I would ask the Inspector to take heed of the following comments by GGG

'They [plans] are produced by and approved by the developer. They do not have the status of supplementary planning documents or other local development documents and are not approved by the local planning authority. If the Council does not agree with them, it can do nothing. Notwithstanding that, para 17 requires planning applications to be consistent
with the masterplans, so in those respects is determining the acceptability of the developer’s own application on its compliance with the developer’s own master plan.

The master plans are required to respond to very vague criteria in para 16. Those are much less precise and useful than the expectations in the submitted D1(2). Almost any scheme could, in a developer’s eyes, meet para 16, even if it was a failure.

There is no obvious justification for the removal of policy D4 and D1 does not adequately replace it. D4 should be reinstated or D1 should be embellished to adequately reflect ‘character’ and equal protection should be given to settlement areas as is given to approaches.

The height of developments in the town should take account of views in and out of it, especially from AONB.

**Attached documents:**

**Comment:** MM3 - LPMM18/1933  **Respondent:** Mrs Fiona Curtis 8570273  **Agent:** Mrs Fiona Curtis

MM3 New Policy S3 - Delivery of development and regeneration with Guildford Town Centre

This policy is welcomed and must be implemented and not open to interpretation that permits this to be secondary to Greenbelt development as this would make a mockery of the NPPF.

It should be possible to build well-designed properties in the town, that meet much of the housing target, within the desired time frame without adverse impact on existing properties.

**Attached documents:**

**Comment:** MM33 - LPMM18/1939  **Respondent:** Mrs Fiona Curtis 8570273  **Agent:** Mrs Fiona Curtis

M33 – Green roofs on commercial buildings will help reduce the impact of commercial buildings on the surrounding area especially AONB

**Attached documents:**

**Comment:** MM35 - LPMM18/1940  **Respondent:** Mrs Fiona Curtis 8570273  **Agent:** Mrs Fiona Curtis

MM35 Revised housing need figures weaken the justification for development

**Attached documents:**

**Comment:** MM35 - LPMM18/1941  **Respondent:** Mrs Fiona Curtis 8570273  **Agent:** Mrs Fiona Curtis

**Comment:** MM35 - LPMM18/1941  **Respondent:** Mrs Fiona Curtis 8570273  **Agent:** Mrs Fiona Curtis
Revised housing need figures weaken the justification for this Greenbelt development.

Attached documents:

Comment: MM37 - LPMM18/1942  Respondent: Mrs Fiona Curtis 8570273  Agent: Mrs Fiona Curtis

I agree with all the points raised by Compton Parish Council, which are as follow:

1. Compton Parish Council objects to the addition of Policy A26A (Blackwell Farm Access Road) within the Local Plan for the following reasons:

   • In written and oral evidence to the Examination, not a single party advocated the use in any way of the existing Down Place access road for the new access road to Blackwell Farm. This was because, self-evidently, it is too narrow and steep for the purpose, and is bounded on both sides by trees which should not be removed for road-widening because they contribute greatly to the landscape and have historic interest. Proposals did suggest crossing this access road at some point, but were otherwise presented as solutions that specifically avoided damage to the existing Down Place. It is therefore inappropriate now to include the option of using Down Place in some way. The proposed Main Modification Policy A26a Requirement 2 should therefore be reworded to read: “The access road will be a new road which avoids the line of the existing Down Place and its associated tree belts.”

   • The revised land allocation for the link road between Blackwell Farm and the A31, shown in the mapped part of proposed Main Modification in new Policy A26a, is substantially different from the options presented in writing and orally to the Examination. It goes well beyond the change which the Inspector would have anticipated from the submissions made. In particular there is no justification for a land allocation for the road on the north-east side of Down Place on the steeply-rising ground on the A31 side of the sharp bend in Down Place (ie above the 120m AOD contour). There were no proposals considered at the Examination which would have involved road building in this area, or a junction with the A31 taking land north-east of Down Place. The allocated area of search for the new road on the principal slope should be amended so that it is confined to land south west of Down Place, and additionally be set back from Down Place to avoid damage to the tree belt alongside this road.

2. Compton Parish Council objects to the inclusion of policy A26a (access road to the Blackwell Farm development site) as a separate policy to the Policy A26 (the Blackwell Farm allocation). The separation should not be allowed to proceed because:

   • The submitted Plan is clear that the Blackwell Farm development cannot proceed without the link road, so the two parts of the scheme are completely linked and separation is entirely unnecessary: if a solution to the link road problem cannot be found, then Blackwell Farm itself cannot be developed;
   • The proposed separation was not raised, by any mechanism, as a matter for discussion at the Local Plan Examination: there is no authority for it from the Inspector;
   • The separation would give the impression that the Blackwell Farm development was entirely outside the Area of Outstanding Natural Beauty, whereas it is 100% dependent on the link road through the AONB;
   • By separating off the link road, the Plan would enable significant parts of the development to proceed without that element of the package: that was not what the submitted Plan proposed.

We doubt that it was the intention of the Council or the Inspector that Policy A26a should be separated from Policy A26, and this should be clarified by including in Policy A26 in Requirement 1, after the insertion of the Main Modification “see Policy A26a”, but within the brackets, the words “which shall be treated as an integral part of Policy A26”. This clarification would deal with our objections.

3. Compton Parish Council objects to the following modification within Policy A26:
• The increase in employment space on the Surrey Research Park in Allocation paragraph 3 from 30,000m² to 35,000m². Whilst the PC welcomes densification of development in the right areas, any increase in office space at this particular location would attract additional traffic and put pressure on a junction that would already be over capacity.


5. Compton Parish Council requests that Guildford Borough Council revisits the housing figures in the modified Policy S2 in the light of recently published ONS household projections. The PC believes that there should be a further hearing to consider both the June 28 ONS population projections and the September ONS household projections (on which, we understand, GBC has been invited to comment). We would then expect the Plan to be modified accordingly to include the removal of a strategic site.

Attached documents:

**Comment: MM40 - LPMM18/1944  Respondent: Mrs Fiona Curtis 8570273  Agent: Mrs Fiona Curtis**

Revised housing need figures weaken the argument for the inclusion of this development.

Apart from the wastewater requirements, the changes lack any rationale or benefit. The condition of the SNCI will be inevitably compromised by the development itself. Moving references to unique places and unique context from opportunities to requirements is no doubt intended to strengthen the expectations but involves turning a very vague expectation into a similarly vague requirement.

Attached documents:

**Comment: MM41 - LPMM18/1945  Respondent: Mrs Fiona Curtis 8570273  Agent: Mrs Fiona Curtis**

The impact of development within and outside Guildford has not been thoroughly modeled and that which has been done has not been scrutinised or even fully publicised (an FOI response to my request about traffic modelling was met with the answer that it was not a good use of Council’s time).

The Local Plan is proceeding with inadequate traffic modelling that underestimates the roads infrastructure requirements that will be generated by its excessive housing number and site selection.

Attached documents:

**Comment: MM43 - LPMM18/1946  Respondent: Mrs Fiona Curtis 8570273  Agent: Mrs Fiona Curtis**

This land is currently on the edge of the AONB and is within Green Belt and outside the settlement boundary. It is critical in preventing urban sprawl from Guildford into the AONB. The differentiation between Shalford and Guildford is fragile and these fields are critical in ensuring that Shalford retains its identity and that Chilworth does the same. This is a critical incursion into very precious open space. It affects views into and out of the AONB and is not a suitable site. This land has not featured in any previous public consultation and therefore is unsuitable for inclusion at this stage.
This new site for 120 homes was deleted from an earlier draft. It is a Green Belt site and no exceptional circumstances have been demonstrated; it will increase traffic, detract from heritage buildings and adds still more homes to the already inflated additions for Send (an increase of 45% for the village as a whole).

This new site for 120 homes was deleted from an earlier draft. It is a Green Belt site and no exceptional circumstances have been demonstrated; it will increase traffic, detract from heritage buildings and adds still more homes to the already inflated additions for Send (an increase of 45% for the village as a whole).

This new site for 105 homes in red-rated Green Belt has not featured in any previous public consultation on the Local Plan. It would increase by 7% the number of dwellings in Normandy Parish, and would place considerable strain on an already inadequate road and sewerage infrastructure in Glaziers Lane. By extending the Flexford settlement boundary north of the natural break of the railway line it would also start to eat into the open space between the distinct settlements of Normandy and Flexford, and damage the openness of the Green Belt in this area. In addition to the sensitivity of the site itself no “exceptional circumstances” have been demonstrated that would justify removing it from the Green Belt. There are also serious doubts about the ability of the site to deliver houses early in the Plan period, which is the sole justification for its inclusion at this late stage.

Map Amending SNCI Former Wisley Airfield

The amendment drastically reduces the size of the site of nature conservation importance at the Former Wisley Airfield. However, the ecological interest of the land still merits SNCI designation. The published SNCI designation is sound and there is no justification for changing it.

The change appears to be to facilitate the new settlement. However, SNCI designation depends upon the merits of the land rather than desires to develop it. Policy ID4(6) sets out the test to be applied to weigh any benefits of a scheme
against the harm to an SNCI. It is not there to be bypassed by the removal of SNCI designations because land is allocated for development or SANG.

Attached documents:

**Comment:** MM7 - LPMM18/1935  **Respondent:** Mrs Fiona Curtis 8570273  **Agent:** Mrs Fiona Curtis

MM7

Rural exception sites should be to help people within the immediate vicinity and at the discretion of the Parish Council/ equivalent. They should be misused or re-interpreted to create open market development to boost numbers to meet wider targets.

Attached documents:

**Comment:** MM9 - LPMM18/1936  **Respondent:** Mrs Fiona Curtis 8570273  **Agent:** Mrs Fiona Curtis

MM9

In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed, would harm openness and become a loophole.

Current NPPF guidelines to protect special landscapes/ features/ biodiversity/ wildlife are being circumnavigated to enable development and this is not in the spirit of the National Policy. If it is in line with the policy then the wording of the national policy should be changed so that the public can see that this government is not protecting these vital areas.

Attached documents:

**Comment:** MM2 - LPMM18/2177  **Respondent:** G Mansbridge 8571137  **Agent:**

**POLICY S2**

BARTON WILLMORE CONSULTANTS have concluded that the correct housing number for Guildford Borough is in fact 431 - not 789 as proposed!

Attached documents:

**Comment:** MM27 - LPMM18/2172  **Respondent:** G Mansbridge 8571137  **Agent:**

**REF. MM27, 41, 42 and 48**
TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.

Attached documents:

**Comment:** MM41 - LPMM18/2168  **Respondent:** G Mansbridge 8571137  **Agent:**

**REF. MM41**

LAND AT GARLICKS ARCH, SEND MARSH, POLICY A43

OBJECTIONS: Too many houses for infrastructure to cope with.

Green Belt with ancient trees

Flooding and contamination

**REF. MM27, 41, 42 and 48**

TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.

Attached documents:

**Comment:** MM42 - LPMM18/2169  **Respondent:** G Mansbridge 8571137  **Agent:**

**REF. MM42**

LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

OBJECTIONS: No need for a huge industrial site in a small village.

Pollution increase

Road congestion.

**REF. MM27, 41, 42 and 48**

TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.

Attached documents:
Comment: MM44 - LPMM18/2170  Respondent: G Mansbridge 8571137  Agent:

REF. MM44

LAND AT ALDERTON'S FARM, SEND MARSH ROAD, POLICY A36

OBJECTIONS: Green Belt Land, and too close to lakes with protection

Wild life corridor

Flooding

Attached documents:

Comment: MM48 - LPMM18/2175  Respondent: G Mansbridge 8571137  Agent:

REF. MM27, 41, 42 and 48

TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.

Attached documents:

Comment: MM9 - LPMM18/2171  Respondent: G Mansbridge 8571137  Agent:

REF. MM9

GREEN BELT POLICY

OBJECTIONS: The modifications will encourage developers to push for permissions on farm land and woodland valuable for recreation and wild life.

Attached documents:

Comment: Other comments - LPMM18/2176  Respondent: G Mansbridge 8571137  Agent:

OTHER DEVELOPMENTS

OBJECTIONS: The total amount of development proposed is quite extraordinary and unreasonable and we cannot understand why Send and Send Marsh are being targeted in this way.

Attached documents:
**Comment: MM2 - LPMM18/4528  Respondent: Gillian Cameron 8571585  Agent:**

MM2

The Examination should be re-opened in the light of the latest ONS figures for housing. 630 p.a. is excessive now and it is not justified to use so much Greenbelt land.

Woking’s figures are also reduced and it is not reasonable for Guildford to lose greenbelt land to cover its reduced needs.

There should be increased development in the Town Centre rather than on Greenbelt land.

**Attached documents:**

---

**Comment: MM3 - LPMM18/4527  Respondent: Gillian Cameron 8571585  Agent:**

MM3  Policy S3 of the Local Plan should:

The Town Centre must be a designated strategic site.

It must be Masterplanned (as opposed to site by site development permitted) and quality of development assured.

It must deliver transport resilience by providing another road across the river and railway lines. Also ensure adequate water, power, and sewerage.

It must open up and protect the river corridor

**Attached documents:**

---

**Comment: MM2 - LPMM18/5847  Respondent: Mr Gordon Farquharson 8571617  Agent:**

MM2- As a member of the Merrow Residents Association, I have access to the expert advice from Neil MacDonald from NMSS who has been contracted by the Guildford Residents’ Association to give advice on the ONS data. The MRA has access to and is entitled to make use of that advice as a contributing member of the GRA. Mr MacDonald suggests there are large differences between GL Hearn and NMSS about how the number of extra homes needed to support job growth should be estimated: GL Hearn calculated this at 606 homes a year 2015-34 and NMSS at 460 homes a year. The differences are largely concerned with the assumptions made about the proportion of the population that will be in work or seeking work i.e. economic activity rates. GL Hearn and NMSS also differ on whether the above figures will provide adequate accommodation for the expected increase in the number of students living in rented accommodation in Guildford. NMSS believe that it will; GL Hearn believe that an extra 23 homes a year are needed for students.

Adjusting the homes for jobs led figures accordingly, the GL Hearn estimate of the number of homes needed each year (the OAN) is 629 (i.e. 606 + 23) whereas the NMSS figure is 460 (i.e. 460 + 0). It is the view of Mr MacDonald that when the key figures are updated to reflect the 2016-based household formation rate projections:
• the number of homes implied by the unadjusted 2016-based household projections is 325 homes a year (2015-34) – compared with 420 homes a year based on using the 2016 SNPP to update the 2014-based projections. This is a reduction of 23%.
• the NMSS calculation of the number of homes needed to support the Inspector’s view of the rate of jobs growth is 361 homes a year – compared with 460 homes a year previously estimated. This is a reduction of 22%.

There will be similar reductions in the GL Hearn figures, suggesting a revised estimate in the range 480-490 homes a year 2015-34, although the exact number cannot be calculated without the detailed population age profiles for the GL Hearn projections.

Based on the new information from ONS and NMSS, and the material reductions in housing need that these point to, I take the view that it is essential that the Examination of the Local Plan is re-opened by the Inspector to allow the latest ONS and NMSS data to be examined and discussed.

Attached documents:

Comment: MM23 - LPMM18/5850  Respondent: Mr Gordon Farquharson 8571617  Agent:

MM23- I support and appreciate the importance of Master Planning. This is especially important for Gosden Hill Farm (Policy A25) to ensure that no development takes place until agreement is reached between the developer and GBC on the key infrastructure requirements for the whole site covering the road network, accessibility, transport, and provision of both water and sewage.

• I am very concerned that with this site there is a suggestion that some development might take place before any infrastructure improvements have been made. This would be unacceptable.
• This policy makes no specific reference to infrastructure nor to the means by which the Master Plan will be approved.
• The position of the Master Plan in the planning process is left vague.
• This deficiency should be rectified and the Local Plan should require that a Master Plan for Gosden Hill Farm be approved before any development takes place.

Attached documents:

Comment: MM27 - LPMM18/5852  Respondent: Mr Gordon Farquharson 8571617  Agent:

MM27 – 4.6.18a which follows the discussion in the Examination of the Local Plan gives us real concerns. I contend that the proposed two-way junction with the A3 in Policy A25 should be a 4 way junction. I refute the suggestion that if the A3 Improvement Schemes do not take place, the traffic problems can be mitigated by other measures. GBC suggested at the Examination in Public that these could include the Sustainable Movement Corridor and the new railway station in Merrow. I do not accept that these mitigating measures - even if they are implemented - are likely to deliver the level of necessary mitigation to address the potential serious traffic problems in the area which underlines the critical importance of a 4 way junction with the A3 on the Gosden Hill Farm site.
In addition I contend that the Sustainable Movement Corridor is not sustainable or viable at all in view of the restricted nature of the roads between Burpham and the Town Centre along the A3100.

More comment on this can be found at MM35.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM28 - LPMM18/5853</th>
<th>Respondent: Mr Gordon Farquharson 8571617</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM28 – I suggest that consideration should not only be given to setting maximum parking standards but also minimum standards. Parking allowances in current developments are totally inadequate.</td>
<td></td>
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</tbody>
</table>

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM3 - LPMM18/5848</th>
<th>Respondent: Mr Gordon Farquharson 8571617</th>
<th>Agent:</th>
</tr>
</thead>
</table>
| MM3 – I note that Policy S3 has been introduced at a late stage but it is neither a plan nor a strategy. I take the view that Policy S3 should be converted into a Master Plan to be incorporated into the Local Plan and that in addition it should include an element of housing development. The following are vital aspects of a proper masterplan amongst other items:  
  • I note that there is no reference to the importance of buses nor bus connections in the reasoned justification in 4.1.19. It is our view that there should be.  
  • I suggest that emphasis should be put on the possibility of underground car parking.  
  • There should be proposals for EV charging.  
  • There should be a review of the impact of ON-LINE shopping to the high street.  
  • Clear strategy for business rates. | | |

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM31 - LPMM18/5867</th>
<th>Respondent: Mr Gordon Farquharson 8571617</th>
<th>Agent:</th>
</tr>
</thead>
</table>
| MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.  
  MM31 A height limit for North Street is required.  
  MM31 There appears to be no allocation for an all-direction bus interchange. | | |

**Attached documents:**
Comment: MM35 - LPMM18/5854  Respondent: Mr Gordon Farquharson 8571617  Agent:

MM35 –Transport Strategy (1) is clear but Transport Strategy (2) is less so and the paragraph suggests that there could be an all movements junction of the A3 with roads north of the A3, Ist of the site and also to the east of the site. The wording of this condition should be amended to be absolutely clear as to what is being proposed to avoid confusion and debate at the planning application stage.

I say this because advice had been sought from GBC Officers prior to the Examination of the Local Plan and they raised the possibility of the connecting road running north east of the site but south of the A3 until it reached approximately Ewbank's offices (on the north side) where a new road and bridge could cross the A3 and link up with the existing B2215 thence on to the A247.

I continue to take the view that there should be a 4 way junction with the A3 at Gosden Hill Farm. The 3 way junction at Garlick's Arch together with the two-way junction at Gosden Hill Farm does provide a spread-eagled 4 way junction but does not avoid the reality that traffic for London from the site would have to go through Burpham or Merrow to get onto the A3. In order to prevent additional traffic congestion and snarl ups in Burpham I continue to believe that there should be a 4 way junction on the Gosden Hill Farm site. I suggest that Transport Strategy (2) should be amended to provide for the option of either such a 4 way junction or the suggestion from Officers mentioned in the preceding paragraph to be finally determined at the Master Planning stage.

I suggest that the last sentence of Transport Strategy (2) should be a separate condition as a link road to the A247 is a separate issue to a possible all movements junction on the A3.

Attached documents:

Comment: MM41 - LPMM18/5855  Respondent: Mr Gordon Farquharson 8571617  Agent:

MM41 – I support the provision at (0b) and a through vehicular link between the B2215 and the A247 that relieves pressure on the Send Marsh roundabout. I have already commented under MM23 on the importance of an infrastructure strategy for Gosden Hill Farm and I suggest that the infrastructure strategy for Gosden Hill Farm should also include these elements taken from MM41.

Attached documents:

Comment: MM5 - LPMM18/5849  Respondent: Mr Gordon Farquharson 8571617  Agent:

MM5 – I note that at 4.2.23 it is stated there is no evidence for a need for a (travellers) transit site within our borough. This is at total variance with the advice published by Commissioner David Munro on the 19th June 2018 where he stated that the use of Transit Sites had been useful in other areas but there are none in Surrey. He states that they should be introduced following a number of recent
unauthorised encampments. A number of these have been in Guildford. Since travellers from time to time make a nuisance of themselves in Merrow by occupying our Park and Ride facility causing significant inconvenience to our residents, and expense to GBC, I take the view that there is a need for a transit site in or near to our borough to avoid travellers parking illegally.

Attached documents:

Comment: MM3 - LPMM18/3069  Respondent: Gordon Bridger 8571809  Agent:

The town centre proposals are so fundamental to this and indeed any plan that making them a subsequent development defies basic planning procedure. A plan needs to start with an analysis of resources available and from this devise appropriate policies. This inadequate planning sequence has serious consequences as set out below.

To produce a plan which scarcely considers the area where most of the retail is based, is the source of most employment and produces most of the wealth of the Borough, where most people work, contains a very high proportion of its population, and the cause of most of its development problems, is a serious flaw.

This serious planning flaw, which the Inspector has rightly drawn attention to, has meant that the Plan does not consider the huge potential for some 3,500 houses on this brown field site claimed by the GVG. The GBC Plan proposes only around 380 houses and a vast, but unspecified increase in retail development. Why was this claim not investigated? If correct it means a massive misallocation of housing to the Greenbelt. Challengers to housing plans on the Greenbelt would demand to know why these figures were not in the Plan? Failure to take these proposals into account is a serious omission and will undermine the Plan. There would be a perfectly good case for a Judicial Enquiry which would surely indicate the Plan was flawed if these figures are not included, or at least challenged in the Plan.

This plan appears to still be heavily reliant on a massive retail development, maybe no longer the 41,000 sm proposed, but it is not clear how much is now planned – but with only some 380 housing a large increase seems to be expected. This needs to be made clear. Since the retail market has imploded, due to structural changes it is difficult to see any justification for an increase in retail. This substantiates the GVG proposal for a substantially higher housing figure. Once again failure to take this into account is another reason why many planning applications on Greenbelt sites are certain to fail – they are not “essential” with so much retail allocated. This space allocated should have been stated and justified. The j retail forecast have been based on a report by Carter Jonas which used data years out of date, was national data not relevant to Guildford, and most important ignored the priority need for housing. The current new Tunsgate shops, not fully rented are a testament to the inadequate retail forecasts.

The need for height of buildings restrictions in the Plan are woefully absent. The Inspector will surely realise when studying the Solum decision, and subsequent applications, for high rise buildings, that these out of scale and character and will ruin Guildford’s historic town centre and add to “the appalling surroundings” which the Inspector correctly identified. There should be a clear height restriction for the town centre which should not exceed 5 storeys.

Attached documents:

Comment: MM12 - LPMM18/2812  Respondent: Harry Eve 8573793  Agent:

MM12

I object to the apparent weakening of Policy P5. I object to the continued disregard for existing wildlife in the choice of sites declared as SANG.
Comment: MM2 - LPMM18/2810  Respondent: Harry Eve 8573793  Agent:

Guildford Local Plan Examination: comments on main modifications

MM2

The revised ONS projections make it clear that the housing number for Guildford and the Housing Market Area should be reduced very significantly. I object to the process continuing without a very significant reduction in the housing number. The examination must be re-opened.

Comment: MM26 - LPMM18/2813  Respondent: Harry Eve 8573793  Agent:

MM26/MM27

I note that the Local Plan preparation continues to proceed with inadequate and understated evidence for the infrastructure requirements that it will generate. An improved traffic model was promised but, at the time of writing, it has not been published and made available for public scrutiny.

Comment: MM27 - LPMM18/2814  Respondent: Harry Eve 8573793  Agent:

MM26/MM27

I note that the Local Plan preparation continues to proceed with inadequate and understated evidence for the infrastructure requirements that it will generate. An improved traffic model was promised but, at the time of writing, it has not been published and made available for public scrutiny.

Comment: MM40 - LPMM18/2815  Respondent: Harry Eve 8573793  Agent:

SITES

There are no exceptional circumstances for removing land from the Green Belt to enable the current site selection.
The continued inclusion of this site is a perverse decision. Guildford Borough Council’s apparent desire to build on this land regardless of the impacts on biodiversity is made clear by their proposed major reduction in the area of the SNCI. Local Authorities should be acting to maintain their SNCIs – not destroy them. I object to the proposed reduction in the SNCI and to the continued inclusion of this site.

The environment that Guildford Borough Council inherited from past generations will be passed on in a far worse state if this Local Plan is implemented. This is in direct opposition to the stated objective of the current Government.

**Attached documents:**

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**Comment:** MM9 - LPMM18/2811  **Respondent:** Harry Eve 8573793  **Agent:**

**Policy P2 modifications**

The revised NPPF places greater emphasis on maintaining, conserving and enhancing biodiversity:

"**Stronger protection for the environment**"

The new framework has also been updated to provide further protection for biodiversity; ensuring wildlife thrives at the same time as addressing the need for new homes.

Changes to the framework see the planning system align more closely with Defra’s [25 Year Environment Plan](#), which aims to leave the environment in a better state for future generations.

The current draft Local Plan will have the opposite effect – destroying wildlife and reducing biodiversity by removal of habitats and corridors.

I object to the policy of insetting villages. There are no exceptional circumstances for doing so. I support the views put forward by East Horsley Parish Council with regard to insetting. Insetting will lead to loss of wildlife corridors and result in smaller gardens most of which will be overmanaged in a way that deters wildlife and reduces biodiversity. It will be a very significant reduction in the quality of life for residents – altering the character of the villages entirely.

I object to the identification of the proposed settlement areas within the Green Belt.

Policy P2 is amended but continues to focus infilling on newly defined settlement areas, within the Green Belt, extending existing village boundaries. In my opinion there is no legal requirement to identify such areas and doing so amounts to pre-determination of planning applications against the intentions of the NPPF. Prescribing these village extensions restricts the right of residents to raise valid planning objections. The wording in Policy P2 should be amended to remove the identification of such areas – and they should be removed from the maps in Appendix H.

I have particular concerns regarding the area known as Horsleys - East Horsley (south) in the maps included in Appendix H. I have lived within the proposed area for 25 years and throughout that time I have acted to “maintain, conserve and enhance” its biodiversity. I manage my plot (garden and attached field) effectively as a private nature reserve. I am not alone in the area in taking a deep interest in, and appreciation of, the wildlife that we share our chosen places with.

“Horsleys – East Horsley (south)” is a choice made by Guildford Borough Council based on a desk-top exercise that ignores various aspects such as biodiversity, landscape, local character and sustainability. Any new housing in this proposed area will generate more short car journeys to the village due to the barriers to walking, and once in a car there is no incentive to switch to the poor local bus service for journeys to destinations such as Guildford town centre. I object to its inclusion in the plan.
I stressed the biodiversity and landscape aspects of the proposal in my examination statement.

Although I have commented on this previously it seems that I need to underline certain aspects of the biodiversity of the proposed settlement area by providing more detail (some of which was included in the East Horsley Neighbourhood Plan evidence).

My garden is home to an isolated colony of the **Small Blue butterfly**.

The Small Blue used to occur at The Sheepleas (an SSSI to the west of the proposed settlement area which includes Surrey’s Coronation Meadow) but died out there due to habitat change.

Efforts to link up the remaining colonies of the Small Blue are being made by the Surrey Small Blue Stepping Stones Project which involves considerable time and work carried out by volunteers. Guildford Borough Council is threatening the future of a colony, currently in my ownership, by signalling to developers that it is suitable for infilling.

My plot also includes a small colony of the **Chalkhill Blue butterfly**.

35 species of butterfly have been recorded in my plot - a high proportion of which are completing every stage of their life cycle on site. This is a high number by any standards for a small site. Butterfly Conservation lists 41 species for Surrey. 12 of the 15 rarer Surrey species have been recorded in my plot.

Nine species of orchid have been recorded in my plot and this includes an exceptional density of **Greater Butterfly Orchid** (Platanthera chlorantha) - probably one of the best remaining sites in Surrey. At least one additional orchid species (a very rare species in Surrey) is also present within the proposed settlement area. They are dependent on the special soils found in this area – and occur along with many other characteristic chalk grassland plants including the uncommon **Knapweed Broomrape** (Orobanche elatior).

Most people find that butterflies and meadows enhance their lives, and feeling of wellbeing, and there are many other aspects to biodiversity.

Among the invertebrates that occur in my plot and are of particular importance due to their scarcity are:

**Microdon devius**

A very rare hoverfly, dependent on anthills, which is now hard to find at The Sheepleas SSSI - one of the few known Surrey sites historically. It occurs in significant numbers in my plot and this year it was particularly numerous. According to information on the website of the Hoverfly Recording Scheme (the notes from "Falk (1991)") "**STATUS** Very local and declining with about a dozen known post 1960 sites, mainly from Wealdon, Hampshire, the North Downs and the Chilterns with one (possibly two) sites in North Wales (Merionethshire). It was also recorded from Middle Harling Fen, Norfolk in 1988."

I have visited a number of other likely historic sites on the North Downs in an attempt to find this species - but without success so far.

The presence of this rare species in large numbers in my plot enables me to make a contribution to knowledge of its phenology that would be difficult to obtain elsewhere.

**Callicera aurata**

A scarce hoverfly associated with old trees. Found on at least three occasions in my field (there has been a fourth likely sighting). Likely to be breeding in the older trees of Chalk Lane. The most recent confirmed sighting was on 15th September 2018.

**Andrena hattorfiana**

A rare, and easily recognised, large mining bee. The "Bees of Surrey" (Surrey Wildlife Trust - 2008) listed six known historic sites for this species in the County. It has been present in my field since at least 2003 (and probably earlier) and...
occurs here in large numbers. It is a Field Scabious specialist. I found it in Wellington Meadow (also within the proposed settlement area) in 2009 and it has been seen there every year since. A small area of Field Scabious has developed at The Sheepleas recently and hattorfiana occurred there for the first time this year (the only records of its occurrence at The Sheepleas are my own, this year, as far as I am aware). Whether there is sufficient suitable habitat to maintain a small population at The Sheepleas remains to be seen. It seems likely that having colonised my field at some point in the past it was able to colonise Wellington Meadow a few years after favourable management was undertaken by East Horsley Parish Council. If it has also succeeded in colonising a small corner of The Sheepleas, nearby, this demonstrates the contribution that large wildlife gardens (and sympathetic Parish Councils) can make to Surrey's biodiversity.

**Osmia bicolor**

A snail-shell nesting bee that is abundant in my garden and field. The North Downs is its main habitat in the UK. Its appearance is extraordinary when flying around carrying sections of dried grass stem to add to its "nest" for protection.

**Pammene trauniana**

I submitted photographs of "micro" moths found in my plot to a survey, the results of which were published in "The Smaller Moths of Surrey" (Surrey Wildlife Trust - 2012). One of the photographs turned out to be of this rare UK resident species. It was confirmed by an expert at the London Natural History Museum and was the only Surrey record obtained in the survey. My understanding is that it had not been found in Surrey for over 100 years. It was photographed on my garden hedge.

**Nemophora metallic**

Another micro moth (a Field Scabious specialist) that has been present in my field, often in very good numbers, since at least 1995. It has also colonised Wellington Meadow (included in the proposed settlement area) but there are still no records from The Sheepleas as far as I am aware.

**Nemophora cupriacella**

This attractive micro moth (also known to utilise Field Scabious and very rare in Surrey) was found in my field for the first time this year. It was on its foodplant. It remains to be seen whether it has colonised.

**Commophila aeneana**

An uncommon and attractive micro moth. Finding this in my field led me to the micro moth survey for identification. I find it nearly every year here and have also seen one in Wellington Meadow.

**Atypus affinis**

The purseweb spider - seen here on two occasions.

**Myrmarachne formicaria**

An unusual spider that resembles a rather colourful ant. Seen here on a number of occasions.

**Glow Worm** (*Lampyris noctiluca*)

It is still possible to find these in the area although they are much reduced from the numbers seen here at the end of the last century (in my experience).

My garden also has a thriving colony of **Viviparous Lizards** (*Zootoca vivipara*) while **Slow Worms** are plentiful in the area.

Another resident has told me that the **Hazel Dormouse** has been seen in two gardens suggesting that the tree-lined banks of the lane act as a north-south corridor for this species. This seems likely given the proximity of known colonies.
Infilling will lead to further destruction of the banks and loss of trees in order to create access points. This will break up the corridor for Dormice.

Many other aspects of chalk grassland wildlife are present (too much to list here).

The area also functions well as an east-west corridor for wildlife on the dip slope of the Downs. Infilling destroys wildlife corridors while the Government has indicated that it wants to maintain them.

My plot is an example of a "biodiversity opportunity area" (in the real sense – though not in the somewhat limited planning definition) in which the opportunity has been realised through 25 years of sound management (Wellington Meadow is another example). The same opportunity applies to the gardens and fields across this proposed settlement area that the Council is going out of its way to invite developers to infill. I am by no means the only wildlife gardener in Chalk Lane. It seems that the current Council is not genuinely concerned about biodiversity or landscape. By defining this settlement area the Council is actively discouraging wildlife gardening and wildlife-friendly land management. The Council is putting wildlife corridors at risk in an area where it could yield significant gains in biodiversity.

Perhaps the planning team were not aware of the implications of their decision - which is in direct contradiction to their own policy on biodiversity. I have pointed out the other aspects that make Chalk Lane unsuitable for infill development.

Please take this opportunity to remove the proposed settlement area from the maps.

Please also remove the other proposed settlement area extensions within the Green Belt and amend the wording in policy 4.3.25 so that no areas are pre-determined in this way. There can be no justification for circumventing the intentions of the NPPF in this manner.

Attached documents:

**SCOPE OF CONSULTATION**

I object to the rules imposed by the Council on this consultation which exclude any comment that strays outside the main modifications made to the latest draft. This sees the local plan in segmented compartments whereas a modification to one component of the plan can have a bearing on the acceptability or otherwise of another component and also on the aggregate effect of the plan on a particular location. In this case the objections stated above are exacerbated by the addition of 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of Send Business Centre, notwithstanding its location in the sensitive Wey Navigation conservation area, its severely restricted road access, its extremely poor public transport connections and the fact that there is no demand, as evidenced by the amount of industrial space in Send that has been vacant for an extended period.

**IMPACT ON SEND**

The aggregate impact of all these developments results in a concentration on Send and Send Marsh which by any standard is excessive and unreasonable considering that they are at the bottom of the spatial hierarchy as defined in the Sustainability Appraisal. Send appears to account for approximately 56% of proposed development in the villages and no reasons are offered even to try to justify why this percentage is so high.

The draft plan should be thought through again with a view to the amount of development required by the Borough being verified more reliably by Guildford Council than it has been so far, having proper regard to the expert evidence and up to date data now available from better sources. This should be followed by a more even distribution of development between a wider selection of villages. Until this is done the draft plan will fail on all key criteria.
HOUSING NUMBERS – POLICY S2 and TABLE at MM2

There is a serious discrepancy on projected housing numbers which undermines the credibility of all of the proposals based on them. At the Public Examination the figure being used by the Inspector was 789 houses per annum, which itself represented an increase over the previous estimate for reasons which were not transparent. Since then the respected consultancy, Barton Willmore, has said that on their calculations the figure should be 431. They disclosed their methodology unlike G L Hearn acting for Guildford Council who had refused to disclose theirs. The September 2018 figure from the Office of National Statistics claimed that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals from highly respected sources are massively less than the figure of 789 on which the Inspector has based his requirement for the current modifications. It should be particularly noted that the ONS have brought their forecast down from the 652 which it calculated in 2014 to 460 now because of the many factors which have changed in the intervening period and must be taken into account. The ONS estimates that by the end of the plan period Guildford Borough overall will have 4,662 additional households compared to the 7,717 which was assumed during the Public Examination. I strongly object, therefore, to the continued use of 789 per annum, and the extrapolations from it, when highly respected sources have compelling evidence that it is wrong.

Attached documents:

Comment: MM27 - LPMM18/5700  Respondent: Douglas French 8574369  Agent:

MAIN MODIFICATIONS MM27 MM41 MM48 Transport Strategy

I object that consideration of the full traffic implications of all these proposals have received such scant attention. With the neighbouring sites at Ockham and Gosden Hill the aggregate impact on traffic in Send Barns Lane and Send Road have simply not been appreciated, still less calculated. The authors of this part of the plan show all the signs of a lack of familiarity with what they are writing about, including in respect of non-vehicular transport routes. Clearly they do not understand the magnet effect of Woking especially Woking Station. Increased noise and nitrogen dioxide pollution will rise to intolerable levels for people living on those two roads, made worse by the impact of the proposed Clandon slip roads. None of this should happen unless and until an in depth study is made to measure the effects and establish whether there would be any ameliorating solutions. I strongly object to the cavalier approach of Guildford Council that it will sort out these matters later.

Attached documents:

Comment: MM41 - LPMM18/5685  Respondent: Douglas French 8574369  Agent:

MAIN MODIFICATION MM41 Land at Garlick’s Arch, Send Marsh, Policy A43

I object to an increase of 37% from 400 to 550 when two drafts earlier this site was taken out of the plans altogether. The fact that 450 of these houses are planned for the first five years is unacceptable since that figure is based on the now discredited total given in the paragraph above. It is regrettable that all the reasons given by residents earlier have been totally ignored by Guildford Council: it is green belt, ancient woodland, subject to flooding, contaminated by lead shot, would generate between 800 and 100 extra cars which the adjacent roads cannot accommodate and the additional population would strain school and medical facilities to breaking point. It is irresponsible for these very material reasons to be ignored.

MAIN MODIFICATIONS MM27 MM41 MM48 Transport Strategy
I object that consideration of the full traffic implications of all these proposals have received such scant attention. With the neighbouring sites at Ockham and Gosden Hill the aggregate impact on traffic in Send Barns Lane and Send Road have simply not been appreciated, still less calculated. The authors of this part of the plan show all the signs of a lack of familiarity with what they are writing about, including in respect of non-vehicular transport routes. Clearly they do not understand the magnet effect of Woking especially Woking Station. Increased noise and nitrogen dioxide pollution will rise to intolerable levels for people living on those two roads, made worse by the impact of the proposed Clandon slip roads. None of this should happen unless and until an in depth study is made to measure the effects and establish whether there would be any ameliorating solutions. I strongly object to the cavalier approach of Guildford Council that it will sort out these matters later.

Attached documents:

Comment: MM42 - LPMM18/5686  Respondent: Douglas French 8574369  Agent: 

MAIN MODIFICATION MM42 Land at Burnt Common, London Road Policy A58

I object to an increase from 7000 to 14,000 sq metres of industrial and storage land, an area which has been increased twice since 2014. This is now very substantially larger than in the earlier draft. When asked by the Inspector during the Examination what it was needed for, the Council were unable to provide a coherent reply. The Inspector then said that the Council could not take Green Belt land for speculative purposes. The Council’s response appears to be not merely to take it but increase its size, showing zero respect for the views of the Inspector. They have also shown zero respect for the residents of Send and Send Marsh/Burnt Common who pointed out that there is no need for new industrial sites on Green Belt land in Send when Slyfied has unused capacity. Added to the 25% proposed increase in the size of Send Business Centre it puts a massively higher concentration of new industrial/warehouse land in Send than in any other village in the whole of the borough. This is notwithstanding the fact that the Employment Land Needs Assessment showed a reduction in demand for such facilities and in any event the Burnt Common site is poorly located for high employment use.

Attached documents:

Comment: MM44 - LPMM18/5687  Respondent: Douglas French 8574369  Agent: 

MAIN MODIFICATION MM 44  Alderton’s Farm, Send March Road, Policy A63

I object to this site for 120 houses being reinstated at the Public Examination stage when it was deleted from an earlier draft because of the very cogent arguments against it made by residents. Now these arguments have been ignored again. With the addition of 550 houses at Garlick’s Arch, 60 at Clockbarn, 40 at Winds Ridge it makes a grand total of 770 extra houses, equivalent to an increase of 45% over the 1700 currently in Send/Send Marsh. The roads and the infrastructure are totally unsuited to this level of increase and no evidence has been produced to show that the implications have been properly thought through. Building here would be detrimental to the heritage sites at Send Marsh Green, destroy a natural wildlife habitat between Send Village and Send Marsh and join them up, so damaging the natural openness of the area.

Attached documents:
MAIN MODIFICATIONS MM27 MM41 MM48 Transport Strategy

I object that consideration of the full traffic implications of all these proposals have received such scant attention. With the neighbouring sites at Ockham and Gosden Hill the aggregate impact on traffic in Send Barns Lane and Send Road have simply not been appreciated, still less calculated. The authors of this part of the plan show all the signs of a lack of familiarity with what they are writing about, including in respect of non-vehicular transport routes. Clearly they do not understand the magnet effect of Woking especially Woking Station. Increased noise and nitrogen dioxide pollution will rise to intolerable levels for people living on those two roads, made worse by the impact of the proposed Clandon slip roads. None of this should happen unless and until an in depth study is made to measure the effects and establish whether there would be any ameliorating solutions. I strongly object to the cavalier approach of Guildford Council that it will sort out these matters later.

Attached documents:

Comment: MM9 - LPMM18/5699  Respondent: Douglas French 8574369  Agent:

MAIN MODIFICATIONS MM9 GREEN BELT

I strongly object to the Council’s determination to ride roughshod over the Green Belt adopting an approach which contravenes Case Law, the revised NPPF and the stated policy of HM Government. Guildford Council needs to appreciate that the law and Government policy applies to it in the same way as it does to everybody else. Without repeating all the case law here “exceptional circumstances” and “special circumstances” have been amply defined in court decisions. Guildford Council continues to show no signs of being aware of that, of, if aware, ready to comply.

MM9 GREEN BELT INSETTING OF VILLAGES

I object to Guildford Council making an exception to Green Belt policy allowing “limited infilling outside the identified settlement boundaries where it can be shown that a site should be considered to be within the village”. Considered by whom and on what criteria? This introduces a subjective test and considerable uncertainty. If Guildford Council wanted to try to negate Green Belt protection this effectively does it. It means that any land on the edge of a village like Send could be picked off for development, an open invitation to developers and speculators at the expense of residents.

This approach by Guildford Council is seriously anti-democratic and shows a complete betrayal of the trust conferred on them at the last ballot box.

Attached documents:

Comment: MM2 - LPMM18/2852  Respondent: Ian Reeves 8575649  Agent:

I am writing to protest most strongly to the latest Draft Guildford Local Plan which has substantially increased Green Belt Development in Send and Send Marsh. I would like my comments to be seen by the Planning Inspector.

The recent Planning Inspectors Report on the Guildford Local Plan was devastating heaping yet more development on Send and Send Marsh villages than the previous Plan. This is now the fourth consultation period since the process began.
In essence, the Planning Inspector has directed Guildford Borough Council in the area of more homes particularly in the first five years. Not surprisingly this has led to a plan incorporating more development on our Green Belt areas, when adequate sites exist in Brown Field sites, to the delight of developers. Yet the most recent ONS growth figures for Guildford are substantially lower than those previously used in the GBC Local Plan projections. We are informed that under the transitional provisions of the NPPF (whatever that means) the new standard method used by the ONS does not apply to the examination of the Guildford Local Plan, i.e. the Inspector is likely to ignore them! Why?? Who is he to trample all over local residents concerns!

The new housing plan calls for increases to the Garlicks Arch area, adjacent to Send Marsh (MM41) Policy A43 from 400 to 550 homes and reintroduction of 120 homes to Aldertons Farm, Send Marsh (MM44) Policy A63. This latter area was withdrawn from an earlier plan for very good reasons. With Clock Barn (60) and Winds Ridge (40) it adds 770 houses to the 1700 currently in Send and Send Marsh villages, an increase of 45%. More importantly the Garlicks Arch and Aldertons Farm sites are set at each end of the village of Send Marsh which is taking an unrealistic 'Hit of Development', scheduled for the first five years of the plan on Green Belt Land! This is not sustainable and will put pressure on an already stressed infrastructure.

In addition to all this the land at Burnt Common, the only link between Send Marsh and Send (MM42) Policy A58 has been increased from 7,000 sq. metres of Industrial Development and Storage to a minimum of 14,800 sq. metres. Did we, the local residents, do something terrible to deserve this level of victimisation? Furthermore we hear that Woking is predicting a shortfall of development piling more pressure on Send/Send Marsh as one of their neighbouring villages when Guildford Borough Council has sufficient Brown Field sites to include in the first five years of the Local Plan and not pander to the developers who of course want to maximise profits and build on our Green Belt!

This leads me on to (MM9) Green Belt Policy. Although these latest modifications to the Local Plan claim to protect the Green Belt except in very special circumstances GBC make an exception for limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be 'within the village'. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents. All sites in the proposed housing increases in Send Marsh are on Green Belt land.

Attached documents:

Comment: MM41 - LPMM18/3504  Respondent: Ian Reeves 8575649  Agent:

The new housing plan calls for increases to the Garlicks Arch area, adjacent to Send Marsh (MM41) Policy A43 from 400 to 550 homes and reintroduction of 120 homes to Aldertons Farm, Send Marsh (MM44) Policy A63. This latter area was withdrawn from an earlier plan for very good reasons. With Clock Barn (60) and Winds Ridge (40) it adds 770 houses to the 1700 currently in Send and Send Marsh villages, an increase of 45%. More importantly the Garlicks Arch and Aldertons Farm sites are set at each end of the village of Send Marsh which is taking an unrealistic 'Hit of Development', scheduled for the first five years of the plan on Green Belt Land! This is not sustainable and will put pressure on an already stressed infrastructure.

2) MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years.

7,000 objections to the previous lower number of houses have been ignored.

It is Green Belt land containing ancient woodland.

It constitutes vast over development with Aldertons Farm to the village of Send Marsh.

As is the case with Aldertons Farm it is subject to flooding.
At least 800 cars plus over 200 cars from Aldertons Farm will back up the adjacent village roads.

Again medical and school facilities be strained to breaking point.

At this moment in writing my objection to the Local Plan with many more objections in my head I am beginning to wonder why after all these years I bother to write my objections yet again and still vote for a Conservative Guildford Borough Council! There is in my mind and those of numerous local residents that our very valid concerns continue to be ignored! Stop blaming the Government Inspector and defend our Borough. He clearly has an agenda and that will not enhance this Governments position in this area, one of their strongholds, enough is enough!

Do not let us waste our precious time year after year objecting. You had a plan that meant our previous objections had been ignored and now you pile more insult on our local residents. I am serious that I want the Inspector to know my and our residents feelings on this matter. I would like to think that our Council would be on the side of their residents and not capitulate at the first fence with an uninformed Government Inspector.

Attached documents:

Comment: MM42 - LPMM18/3506  Respondent: Ian Reeves 8575649  Agent:

In addition to all this the land at Burnt Common, the only link between Send Marsh and Send (MM42) Policy A58 has been increased from 7,000 sq. metres of Industrial Development and Storage to a minimum of 14,800 sq. metres. Did we, the local residents, do something terrible to deserve this level of victimisation? Furthermore we hear that Woking is predicting a shortfall of development piling more pressure on Send/Send Marsh as one of their neighbouring villages when Guildford Borough Council has sufficient Brown Field sites to include in the first five years of the Local Plan and not pander to the developers who of course want to maximise profits and build on our Green Belt!

Attached documents:

Comment: MM44 - LPMM18/2853  Respondent: Ian Reeves 8575649  Agent:

Individual concerns:-

1) MM44 Land at Aldertons Farm, Send Marsh Road, Policy A63.

Site for 120 homes.

Why is this in the GBC first 5 year development plan - it is Green Belt land with no special circumstances so it contradicts Policy MM9.

These fields (now paddocks to graze horses) absorb a great deal of moisture and act as natural drainage resulting in flooding in the lower field during the winter. Send Marsh is as the name implies a marshland and does not require being concreted over to exacerbate the problem.

My neighbour in Tuckey Grove has some form of stream running under his garage and after rain it springs up in his drive and runs down the road. There is another site 50 metres away where water bubbles up during winter months. Building 120 houses on this site could result in further water issues in adjoining houses.

Apart from the horses in these fields there is much wildlife including deer that can often been seen grazing along side them.
The additional traffic will increase pressure on the Send Cross Roads.

It will detract from the whole heritage and buildings in Send Marsh.

Development of it will incur much noise and disruption within a Surrey village being swamped with unnecessary development.

This will add to more pressure on already stressed Surgery and School facilities.

Individual concerns:–

1) MM44 Land at Aldertons Farm, Send Marsh Road, Policy A63.

Site for 120 homes.

Why is this in the GBC first 5 year development plan - it is Green Belt land with no special circumstances so it contradicts Policy MM9.

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Attached documents:

Comment: MM9 - LPMM18/3507  Respondent: Ian Reeves 8575649  Agent:
This leads me on to (MM9) Green Belt Policy. Although these latest modifications to the Local Plan claim to protect the Green Belt except in very special circumstances GBC make an exception for limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be 'within the village'. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents. All sites in the proposed housing increases in Send Marsh are on Green Belt land.

**Attached documents:**

**Comment:** MM35 - LPMM18/1581  **Respondent:** Mr John Sweeting 8579393  **Agent:**

Re: Sites numbered:

A25 – Gosden Hill
A35 – Former Wisley Airfield
A42 – Land at Burny Common Heath
A43 and A43a - Land at Burnt Common – known as Garlick's Arch
A58 - Land around Burnt Common warehouse
A63 - Land at Aldertons Farm
in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. There remains considerable uncertainty in the number of houses needed in the Borough. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   This view is now confirmed by the recent Office for National Statistics (ONS) prediction that the number of homes needed in the Borough in the plan period is 4662 – a substantial reduction compared to the earlier forecast of 7717. To increase the number of sites – i.e. the addition of site A63 - and to increase the development at other sites is perverse to say the least and simply ignores ONS figures and the wishes of most of the residents to keep the area semirural.
2. With the revised ONS forecast, the requisite number of homes can be met from brownfield sites – as noted by Councillor Susan Park. Continuing with the increased number will result in unnecessary loss of the Greenbelt. This is a tragedy and contradicts policy MM9 as 'special circumstances' necessary for reclassification have not been established.
3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area.
   In particular this could provide the starting link in connecting Guildford to the M25. The Greenbelt policy was originally introduced to counteract urban spread and has worked well for many years and there does not appear to be any reason to abandon it at this time as once the space has gone it will never be recovered.
4. These developments place a disproportionate burden on the north east of the Borough.
5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours when additional congestion at the junctions in the vicinity of the A3 is likely.
6. With specific reference to site A63, there is currently less than 100 homes with a frontage on Send Marsh Road, adding 120 homes at this site with access from Send Marsh Road will inevitably increase the traffic and during peak hours is likely to cause serious congestion at both ends of the road and Send Marsh Green.

7. Other infrastructure.
   The Garlick's Arch, Clockburn and Winds Ridge sites are estimated to result in an increase demand of 45% on the infrastructure in that area. Is there adequate power, drainage and sewage provision for industrial development? And are there sufficient school, medical and similar provisions for domestic expansion?

8. Light and sound pollution.
   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society.
   It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.
   If, despite their adverse impact, the sites continue to be included in the plan, provision should be made for strict control of noise and light pollution emanating from the sites – particularly at night time.

9. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. Examples are Garlick's Arch in particular contains ancient woodlands and even the Aldertons site contains a large mixed hedge. It seems perverse that planning permissions have been refused because of the impact on individual trees whilst the wholesale destruction of woods and hedges seems inevitable if these sites are included.
   It seems difficult to reconcile these two extreme positions.
   If, despite their adverse impact, the sites continue to be included in the plan, preservation orders should be placed on appropriate trees as a minimum requirement.

Attached documents:

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Comment: MM40 - LPMM18/1582  Respondent: Mr John Sweeting 8579393  Agent:

Re: Sites numbered:
A25 – Gosden Hill
A35 – Former Wisley Airfield
A42 – Land at Burny Common Heath
A43 and A43a - Land at Burnt Common – known as Garlick's Arch
A58 - Land around Burnt Common warehouse
A63 - Land at Aldertons Farm

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

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   This view is now confirmed by the recent Office for National Statistics (ONS) prediction that the number of homes needed in the Borough in the plan period is 4662 – a substantial reduction compared to the earlier forecast of 7717. To increase the number of sites – i.e. the addition of site A63 - and to increase the development...
2. With the revised ONS forecast, the requisite number of homes can be met from brownfield sites – as noted by Councillor Susan Park. Continuing with the increased number will result in unnecessary loss of the Greenbelt. This is a tragedy and contradicts policy MM9 as 'special circumstances' necessary for reclassification have not been established.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25. The Greenbelt policy was originally introduced to counteract urban spread and has worked well for many years and there does not appear to be any reason to abandon it at this time as once the space has gone it will never be recovered.

4. These developments place a disproportionate burden on the north east of the Borough.

5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours when additional congestion at the junctions in the vicinity of the A3 is likely.

6. With specific reference to site A63, there is currently less than 100 homes with a frontage on Send Marsh Road, adding 120 homes at this site with access from Send Marsh Road will inevitably increase the traffic and during peak hours is likely to cause serious congestion at both ends of the road and Send Marsh Green.

7. Other infrastructure.
   The Garlick’s Arch, Clockburn and Winds Ridge sites are estimated to result in an increase demand of 45% on the infrastructure in that area. Is there adequate power, drainage and sewage provision for industrial development? And are there sufficient school, medical and similar provisions for domestic expansion?

8. Light and sound pollution.
   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society.
   It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.
   If, despite their adverse impact, the sites continue to be included in the plan, provision should be made for strict control of noise and light pollution emanating from the sites – particularly at night time.

9. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. Examples are Garlick’s Arch in particular contains ancient woodlands and even the Aldertons site contains a large mixed hedge. It seems perverse that planning permissions have been refused because of the impact on individual trees whilst the wholesale destruction of woods and hedges seems inevitable if these sites are included.
   It seems difficult to reconcile these two extreme positions.
   If, despite their adverse impact, the sites continue to be included in the plan, preservation orders should be placed on appropriate trees as a minimum requirement.

Attached documents:

Comment: MM41 - LPMM18/1583  Respondent: Mr John Sweeting 8579393  Agent:
A43 and A43a - Land at Burnt Common – known as Garlick's Arch
A58 - Land around Burnt Common warehouse
A63 - Land at Aldertons Farm

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I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

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   This view is now confirmed by the recent Office for National Statistics (ONS) prediction that the number of homes needed in the Borough in the plan period is 4662 – a substantial reduction compared to the earlier forecast of 7717. To increase the number of sites – i.e. the addition of site A63 - and to increase the development at other sites is perverse to say the least and simply ignores ONS figures and the wishes of most of the residents to keep the area semirural.

2. With the revised ONS forecast, the requisite number of homes can be met from brownfield sites – as noted by Councillor Susan Park. Continuing with the increased number will result in unnecessary loss of the Greenbelt. This is a tragedy and contradicts policy MM9 as 'special circumstances' necessary for reclassification have not been established.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area.

   In particular this could provide the starting link in connecting Guildford to the M25.

   The Greenbelt policy was originally introduced to counteract urban spread and has worked well for many years and there does not appear to be any reason to abandon it at this time as once the space has gone it will never be recovered.

4. These developments place a disproportionate burden on the north east of the Borough.

5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours when additional congestion at the junctions in the vicinity of the A3 is likely.

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   It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.

   If, despite their adverse impact, the sites continue to be included in the plan, provision should be made for strict control of noise and light pollution emanating from the sites – particularly at night time.

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   It seems difficult to reconcile these two extreme positions.

   If, despite their adverse impact, the sites continue to be included in the plan, preservation orders should be placed on appropriate trees as a minimum requirement.
Comment: MM42 - LPMM18/1584  
Respondent: Mr John Sweeting  
Agent:  

Re: Sites numbered: 
A25 – Gosden Hill 
A35 – Former Wisley Airfield 
A42 – Land at Burny Common Heath 
A43 and A43a - Land at Burnt Common – known as Garlick's Arch 
A58 - Land around Burnt Common warehouse 
A63 - Land at Aldertons Farm  
in the revised draft local plan. 

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. There remains considerable uncertainty in the number of houses needed in the Borough. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further. 
   This view is now confirmed by the recent Office for National Statistics (ONS) prediction that the number of homes needed in the Borough in the plan period is 4662 – a substantial reduction compared to the earlier forecast of 7717. To increase the number of sites – i.e. the addition of site A63 - and to increase the development at other sites is perverse to say the least and simply ignores ONS figures and the wishes of most of the residents to keep the area semirural.

2. With the revised ONS forecast, the requisite number of homes can be met from brownfield sites – as noted by Councillor Susan Park. Continuing with the increased number will result in unnecessary loss of the Greenbelt. This is a tragedy and contradicts policy MM9 as 'special circumstances' necessary for reclassification have not been established.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. 
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4. These developments place a disproportionate burden on the north east of the Borough.

5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours when additional congestion at the junctions in the vicinity of the A3 is likely.

6. With specific reference to site A63, there is currently less than 100 homes with a frontage on Send Marsh Road, adding 120 homes at this site with access from Send Marsh Road will inevitably increase the traffic and during peak hours is likely to cause serious congestion at both ends of the road and Send Marsh Green.

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   The Garlick's Arch, Clockburn and Winds Ridge sites are estimated to result in an increase demand of 45% on the infrastructure in that area. Is there adequate power, drainage and sewage provision for industrial development? And are there sufficient school, medical and similar provisions for domestic expansion?
8. Light and sound pollution. The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society. It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds. If, despite their adverse impact, the sites continue to be included in the plan, provision should be made for strict control of noise and light pollution emanating from the sites – particularly at night time.

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Attached documents:

**Comment:** MM44 - LPMM18/1585  **Respondent:** Mr John Sweeting 8579393  **Agent:**

Re: Site numbered A44 in the revised draft local plan.

I would like to object to the inclusion of this site in the draft local plan for the following reasons:

1. As 1 above.
2. There is some provision for Travellers/Showpeople in A43
3. This development will add to the disproportionate burden on the north east of the Borough.
4. There is a question as to the suitability of the land for building purposes.

Re: Sites numbered:

A25 – Gosden Hill
A35 – Former Wisley Airfield
A42 – Land at Burny Common Heath
A43 and A43a - Land at Burnt Common – known as Garlick's Arch
A58 - Land around Burnt Common warehouse
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in the revised draft local plan.

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forecast of 7717. To increase the number of sites – i.e. the addition of site A63 - and to increase the development at other sites is perverse to say the least and simply ignores ONS figures and the wishes of most of the residents to keep the area semi-rural.

2. With the revised ONS forecast, the requisite number of homes can be met from brownfield sites – as noted by Councillor Susan Park. Continuing with the increased number will result in unnecessary loss of the Greenbelt. This is a tragedy and contradicts policy MM9 as 'special circumstances' necessary for reclassification have not been established.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area.
   In particular this could provide the starting link in connecting Guildford to the M25.
   The Greenbelt policy was originally introduced to counteract urban spread and has worked well for many years and there does not appear to be any reason to abandon it at this time as once the space has gone it will never be recovered.

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Attached documents:

**Comment:** MM2 - LPMM18/1185  **Respondent:** John Baylis 8579905  **Agent:**

COMMENTS ON MM2

**I have the following comments on MM2**

New lower population and household figures have been produced by the Office for National Statistics. These correct flaws which inflated Guildford’s housing figures by overestimating how many students stay and have children after their course finishes.
Guildford Residents Association’s adviser, a leading national expert, has shown **Guildford can achieve ambitious economic growth with an extra 360 homes a year**. This is still a big number, recognising we need homes, but is much more realistic than the 672 extra homes a year currently proposed in the Draft Plan which would lead to excessive loss of countryside, congestion and town cramming.

The new figure of 360 homes means **development in the Green Belt on the scale proposed in the Plan can no longer be justified**. The new lower figure would also make it **more achievable to bring forward well-planned, sensitively-designed housing in the town centre** in a timely way.

I ask the Inspector to re-open the examination and amend the Plan to take account of the new lower figures.

**Attached documents:**

**COMMENTS ON MM3 (NEW POLICY S3) AND MM23**

I have the following comments on MM3 containing the new Policy S3: ‘Delivery of development and regeneration within Guildford Town Centre’. I also refer to MM23 and the Policy D1

1. The Policy presented in MM3 needs to be put into the format of the other Policies in the Plan as regards use of coloured boxes etc.
2. The Policy needs a brief Introduction which expresses the great importance of the Town Centre (TC) to the Borough.
3. This Introduction should also explain that the TC sits within the Guildford Urban Area.
4. The words ‘most efficient’ in (3) can be interpreted as a need to put as much development on a site as possible, hence encouraging very high rise development. Item (5), especially the new D1 set out in MM23, may prove insufficient to control excessive height and bulk. The words ‘most efficient’ should be suitably qualified.
5. In the new D1 quite a lot of local policy has been lost from the deleted D4. This needs to be checked. Just as one of many examples, D4 Policy 1 (e) reads “ensure appropriate density to make the most efficient use of the land whilst responding to local character and context”. The caveat ‘whilst responding to local character and context’ is removed in the new S3: it should be added. Para 4.5.52 of D4, which refers to the RDG and LCAs, is not reproduced in MM23. It should be retained in the new D1.
6. The words ‘local character’ should definitely appear in (5).
7. 6(c) should read ‘attractive and safe public spaces and public realm’
8. 6(e) is insufficient. As a minimum, the word ‘towpaths’ should be added.
9. 4.1.18(b) and 4.1.19 give status to the Town Centre Regeneration Strategy (TCRS). This Strategy says that it has virtually no status. It contains a large number of proposals, many good, some doubtful (e.g. praise for the Pop up Village). It gives a much welcome emphasis to the creation of a riverside park, see 8 above. Under the heading ‘Principles for good design’ it says: “The height and scale of any new development must sit well with the surrounding townscape. Guildford is predominately a low-rise town and proposals for buildings that are substantially taller than surroundings will need to ensure that they do not impact negatively on views of historic buildings and respect urban grain and the skyline.” Thus the status of the TCRS is of much importance. One could give other examples. Also, the TCRS refers positively to the 2015 TCMP. It should be made even clearer that the TCRS will carry weight in planning decisions.
10. 4.1.19(g) expresses a very desirable objective, but S3 does little to achieve it.
11. 4.1.21 and 4.1.22 seem to be trying to express in a rather awkward way the need to strike a balance between: (a) provision of the essential functions of a town centre: shops, places of work, entertainment facilities, public realm and civic buildings (library, town hall etc.), and (b) provision of housing. The two paragraphs should be reworded to express the need for a balance more directly.
12. 4.1.23, 24 and 25 are a very welcome expression of the importance of the public realm.
I write further to our previous representations, dated 21 July 2017 (of copy of which is attached as Appendix 1 herewith and to which we received no reply), relating to, in the main, the above site.

Housing Numbers

It is noted that, in line with the Inspector’s comments relating to the Guildford Housing figures, there is an increase in the overall housing provision for the period 2015 – 2034 from 12,426 to 12,600 new homes.

Although this figure is 1,260 fewer homes than the number previously set out by the Borough, this increase is welcomed in order to address the Council’s shortfall in new dwellings.

for appendix see attachments

Attached documents:  D&M PLANNING APPENDIX 1 Redacted.pdf (554 KB)

Green Belt Map

As can be seen within the attached letter dated July 2017; the site was subject to Amendments 1 – 8 (Normandy and Flexford).

Map MM 42 relating to the latest draft version of the Local Plan, attached as Appendix 2, highlights the location of Halsey Cottage and shows the proposed settlement boundary realignment.

To reiterate, our client objects to the inclusion of his residential garden curtilage land to be located within open Green Belt and outside of the settlement boundary.

Within our previous submission, it was outlined that the land further west of the garden of Halsey Cottage is already designated as Metropolitan Green Belt and, as such, does not need to be made more robust and defensible as it is already afforded all of the statutory protection that comes with it being Green Belt land.

Since our previous submission, the National Planning Policy Framework (NPPF) has been updated.

Our previous submission referred to paragraph 85 of the 2012 NPPF, which has been superseded by paragraph 139 of the 2018 version and which says:

When defining Green Belt boundaries, plans should:

a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;
b) not include land which it is unnecessary to keep permanently open;
c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Each of the above points are discussed below:

a) The site has the potential to accommodate additional, albeit a modest degree of, development, to help the Council achieve its housing numbers.

In order to do this, the settlement boundary would not need to be moved from its current location, but merely taken out of the Green Belt, the same as the rest of the village.

b) The land in question is lawful residential curtilage land (see photographs attached as Appendix 3), with open Green Belt land beyond and which is defined by a strong boundary treatment. As such, it is not necessary to keep this land permanently open.

Further to the above, there is no requirement to safeguard this residential garden land from the open, agricultural fields beyond.

The residential garden curtilage in question is not significant in size and thus, cannot be viewed as a location where ‘large’ amounts of development could come forward.

c & d) The site is not ‘safeguarded’ land, but it could come forward as a potential ‘windfall’ site.

Indeed, as well as sites being allocated for new housing within the Normandy / Flexford area, policy P2 of the draft Local Plan highlights Normandy as location where new development could be acceptable.

To include my client’s residential garden land within the Green Belt, outside of the settlement boundary, would prejudice any opportunity to do this.

e) If sites, such as the residential garden curtilage of Halsey Cottage, are taken outside of the settlement and placed within open Green Belt, and thus prejudicing their ability to accommodate new development, there is every possibility come the end of the plan period these sites will be taken back out of the Green Belt in any event.

f) The Council’s line of segregation of my client’s residential garden curtilage is arbitrary.

As can be seen from the photographs attached as Appendix 3, there are no physical or otherwise discerning features which could possibly demark land that would be within or outside of the settlement area / open Green Belt.

It is noteworthy that the rear garden curtilage of Halsey Cottage has been within the settlement boundary since at least 2003 (when the current Local Plan was adopted) and has always been used as residential garden curtilage since my client first purchased the property in August 2012 from the vendor who themselves purchased the property in 1994.

The garden was actually created in 1934 from the plot to the northern boundary. The remaining land was utilised to build the houses that are there today.

Inter alia, paragraph 140 of the NPPF says:

If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.

Clearly the Council does not consider that Normandy does make an important contribution to the openness of the Green Belt otherwise it would not seek to remove it from the Green Belt.
Therefore, it is not understood what contribution to the openness of the Green Belt the section of residential garden of Halsey Cottage makes and why the Council has not sought to keep it within the settlement boundary. There are other rear gardens belonging to other properties within Glaziers Lane with similar attributes to Halsey Cottage’s and, therefore, it seems somewhat perverse that no other rear garden has been omitted from the settlement boundary.

As such, it is contended that Guildford’s approach in segregating my client’s residential garden curtilage is contrary to the planning policy advice set out within the NPPF.

However, if it is the approach of the Council to seek to protect the Grade II Listed Building by virtue of placing the curtilage land within open Green Belt outside of the settlement boundary (at this point it is worth mentioning that a portion of the garden curtilage land of No. 38, to the south-east, is part of the historic curtilage of Halsey Cottage, (bought in around 1978)), paragraph 140 of the NPPF also says:

*If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.*

If this is the case, this is not only contrary to paragraph 140 of the NPPF, but also highlights a lack of confidence and robustness within the Council’s conservation, heritage and development management policies. Furthermore, I can find no justification, or indeed any reason, within any of the Council’s documents setting out why the garden curtilage of Halsey Cottage has been taken out of the settlement boundary of Normandy and placed within the open Green Belt.

The NPPF 2018 is very clear in setting out that there should be a presumption in favour of sustainable development and, at paragraphs 14 and 15, says:

*At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking*

**Paragraph 14**

*Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.*

**Paragraph 15**

The NPPF is, therefore, quite plain in that land that can accommodate sustainable development should not be prevented from coming forward when available, as is the case here.

To reiterate, it is therefore considered that by removing the garden curtilage land from the settlement boundary and including it within open Green Belt land is contrary to the NPPF as:

a) The residential garden curtilage makes not greater contribution to the openness of the Green Belt than other gardens within Glaziers Lane and which have remained within the settlement boundary of Normandy.

b) The whole of the land is lawful residential curtilage. It has no physical or other defining features which gives it the character or appearance of being anything other than residential curtilage. As such, the garden curtilage land should not be segregated.

c) Because of the site’s sustainable location, it is entirely possible that if the garden curtilage is placed within open Green Belt land, the boundary may be moved again for the ‘next’ Local Plan period.

d) Taking the land outside of the settlement boundary will provide no greater benefit to the openness of the Green Belt as it will remain as lawful residential curtilage.
e) If the Council is seeking to place the garden within open Green Belt to protect the setting of the Listed Building, this is contrary to the planning policy guidance of the NPPF and highlights inadequacies within the Council’s development management, conservation and heritage protection policies.

f) Removing the site from the settlement boundary and placing it within open Green Belt is contrary to the aim of enabling sustainable development sites in coming forward.

I look forward in receiving acknowledgement of these latest representations and being kept abreast of the progress of the Local Plan.

Attached documents:
- D&M PLANNING APPENDIX 1_Redacted.pdf (554 KB)
- D&M Planning Appendix 3.pdf (2.1 MB)
- d&m planning appendix 2.pdf (1.1 MB)
The wording relating to Ash, Tongham and Ash Green is not consistent with Countryside policy as set out in the NPPF regarding how and when development in the countryside can occur. We note specifically that two of the three properties along the road (White Lane) in this area are referred to as ‘farms’ and can thus be developed under normal planning policies that apply to farms and countryside (regardless of whether or not they are in or near Ash, Tongham or Ash Green).

Attached documents:

Comment: MM18 - LPMM18/1195  
Respondent: Burpham Neighbourhood Forum (Jim Allen) 8581505  
Agent: 

Policy E7; Retail and Leisure Uses in Guildford Town Centre

This policy could be re-worded to recognise the potential that housing can play in the future development of the town centre, specifically where a new retail or leisure use would benefit from an element of residential development for viability purposes.

Please see our previous comments on town centre policy.

Attached documents:

Comment: MM2 - LPMM18/1189  
Respondent: Burpham Neighbourhood Forum (Jim Allen) 8581505  
Agent: 

Response to Policy S2;

3. Policy Para’s (1) to (3)

3.1. We are concerned that these figures still do not represent a reasonable calculation of housing need; noting that the reason Woking cannot meet their needs is their refusal to release Green Belt. It is therefore inequitable to expect Guildford to release further Green Belt land having released so much for its own requirements. We look forward to you revisiting these figures once the September technical data is released as the Inspector stated during the EiP.

Reasoned Justification Para 4.1.9a to 4.1.10.

The Statement fails to take note of ‘where it is practical to do so’ - it is not practical to do so without moving into Green Belt. Woking Borough ‘using’ Green Belt from Guildford to protect Woking Green Belt is inequitable and counterproductive as it provides no incentive for any borough to meet its own needs.

Para 137 (c) of the new NPPF states that a statement of Common Ground is required as part of the justification for Green Belt release. No such statement of Common Ground has been drawn up between the two boroughs. Therefore allocating housing from Woking is currently incompatible with the wording of the 2018 NPPF. This should be considered in its entirety, or not at all, as part of the examination of this Local Plan. We raise this issue because we note with interest that the Main Modifications make specific reference to the new requirements of the 2018 NPPF.

Reasoned Justification Para 4.1.9a to 4.1.10.

The Statement fails to take note of ‘where it is practical to do so’ - it is not practical to do so without moving into Green Belt. Woking Borough ‘using’ Green Belt from Guildford to protect Woking Green Belt is inequitable and counterproductive as it provides no incentive for any borough to meet its own needs. Para 137 (c) of the new NPPF states that a statement of Common Ground is required as part of the justification for Green Belt release. No such statement of
Common Ground has been drawn up between the two boroughs. Therefore allocating housing from Woking is currently incompatible with the wording of the 2018 NPPF. This should be considered in its entirety, or not at all, as part of the examination of this Local Plan. We raise this issue because we note with interest that the Main Modifications make specific reference to the new requirements of the 2018 NPPF.

**Para 4.1.9ab Table S2a Sources of supply**

In 2015, Thames Water declared an available sewer capacity for 4,000 new homes across the borough. This table reveals that the BNF's estimate of 2,000 homes with permissions or completed since 2015 (please see our hearing statement) was an underestimation. As 3,675 homes have been approved or completed since 2015, a Burpham Neighbourhood Forum sewer capacity for just 325 homes remains, which equates to less than half a year’s sewer capacity for the proposed 672 homes per year. This is clearly well short of the infrastructure requirement for five year land supply, let alone the total volume of new homes proposed over the plan period.

Thus the Local Plan in practical terms is unsound as no proposal in this Plan provides for such rapid upgrade to the water infrastructure. We note that Thames Water on the 3rd September released its business plan for the 2020 - 2025 period which did not include financial provision for any new capacity pertaining to Guildford.

Further information can be found at the following link [https://www.getsurrey.co.uk/news/surreynews/guildford-council-bear-full-cost-15122956](https://www.getsurrey.co.uk/news/surreynews/guildford-council-bear-full-cost-15122956)

Please note, in practical terms the enlargement of pipe sizes for additional capacity takes three years and increase of treatment capacity takes five to ten years. Thus the Local Plan cannot be considered sound, as the water infrastructure simply cannot be upgraded within the five year ‘land supply requirement’ window.

**Para 4.1.9ac Table S2b Sources of Supply**

We welcome the reduction in the housing figure on Gosden Hill. However this in isolation does not in itself give reassurance that a defendable Green Belt boundary can be achieved. It is unclear whether the site allocation boundary will be amended to reflect the housing reduction on this site.

Further to the Office for National Statistics (ONS) release of 2016 household projection figures; 20th September 2018, the projected number of households per year to the end of the Plan period is now down to approximately 420 from 672 per annum. With the required 5 year supply at the start of the Plan included in the main modifications, (over 3,000 additional plots have been added to the proposed allocations) the total number of proposed dwellings now tops 15,000 the vast majority proposed to be built in the Green Belt. In reality over 40% of the Green Belt allocation could be removed in light of this new material and compelling evidence, which equates to one of the strategic sites. It is our contention that the Gosden Hill site allocation should be removed from the Plan because it would require more off site infra-structure work than of any of the proposed allocations to make it sustainable and viable. At the very least, in light of the new evidence from ONS, it is now necessary to re-visit the exceptional circumstances arguments that have been made to justify the release of this and other allocations from the Green Belt. We look forward to receiving the Inspector’s guidance on this matter.

Note: Should a tunnel be deemed necessary under Guildford, this site should be protected for the tunnel’s entrance.
Further, this Plan makes no mention of the fact that the water treatment across the borough is lacking in capacity. We remain concerned that the Plan pays little regard to infrastructure other than roads.

Monitoring Indicators.

These plots identified as ‘traveller plots’ make no mention of these travellers ‘departing’ to allow for others arriving and depart. It is implied that these pitches are for permanent occupants, thus the problem of traveller incursions elsewhere will remain unmitigated. The policy should include ‘time limited plots’, to ensure that there is a regular turnover of occupants to make pitches available to other travellers. We are concerned that the indicator seeks to make provision for groups of ‘unknown planning status’. This is an extremely wide definition which would be open to abuse and should be removed.

Conclusion:
We are grateful for the opportunity to provide comment on these proposed modifications to the Local Plan. However they do not demonstrate sufficient robustness in finding additional housing capacity in the town centre or other brownfield locations to meet the first five year land supply requirements.

In light of the publication by the ONS on 20th September 2018 of the revised household projections we trust that the Inspector will arrange further hearings to discuss the implications of this new evidence for Guildford’s housing requirements and the reduced need to release land from the Green Belt.

Attached documents:

Comment: MM22 - LPMM18/1196  Respondent: Burpham Neighbourhood Forum (Jim Allen) 8581505  Agent:

Policy E9; Local Centres and Isolated retail units

We agree with this amended wording to the policy as it is important that housing development is served by local facilities. Food retail outlets should be specifically written into the Section 106 agreement.

Attached documents:

Comment: MM23 - LPMM18/1198  Respondent: Burpham Neighbourhood Forum (Jim Allen) 8581505  Agent:

D4; Character and Design of New Development.

We disagree with the deletion of this policy. Although more detailed development control policies will form part of the second part of the Local Plan, it is important to have an overarching character and design policy to guide strategic considerations, particularly where multiple site allocations are close together.

Attached documents:

Comment: MM24 - LPMM18/1197  Respondent: Burpham Neighbourhood Forum (Jim Allen) 8581505  Agent:

Policy D2; Sustainable Design, Construction and Energy.
We are concerned that the proposed wording ‘that meets the highest national standard…..’ is too vague as the national water standard deals with supply not disposal. The policy should be reworded to specifically require detailed consideration of foul water, flow rates and disposal.

Attached documents:

Comment: MM26 - LPMM18/1199  Respondent: Burpham Neighbourhood Forum (Jim Allen) 8581505  Agent: 

Policy ID1: Infrastructure and Delivery

Para (4): The wording ‘if appropriate’ needs to be deleted and the word 'should' need to be changed to ‘shall’. The current wording leaves the door open for inadequate infrastructure supply as has occurred at Cranleigh within the Waverley Local Plan.

Para (5a to 8): The proposed wording provides too great an opportunity for developers to avoid payments towards infrastructure. This is likely to place an additional burden on the local authority to provide the infrastructure or mean that infrastructure is not provided. Stronger wording which denies developers the chance to escape their infrastructure responsibilities is needed in this policy.

Page 40: Reasoned Justification

We object to this wording on two grounds

1. The proposed wording is vague and does not contain specific dates for a review to take place. Neither does it name specific allocations to which these issues may apply. Also, alternative road arrangements are not defined. This is too open to interpretation. For this reason the wording is not strong enough to ensure that a Local Plan review will take place, potentially resulting in the development of many thousands of dwellings without the necessary supporting infrastructure, leading to unsustainable development. The presence of this wording is itself a strong reminder of the Local Plan’s unsoundness in relation to infrastructure generally.

2. Based on the current proposed housing numbers and corresponding number of vehicles (please see hearing statement for calculations), 45,000+ additional vehicles are projected to belong to residents in the HMA area over the life of the Plan. Development on any site adjacent to the A3 prior to the Highways England implementing its currently unknown ‘A3 solution’ is unsound. There are already published significant delays to road improvements in the vicinity of the A3 through Guildford and M25 J10.

The current order of Highways England’s proposals is:-

a. The introduction of a Smart motorway on the M25, followed by;

b. The J10 improvements (project is some six months delayed in an 18 month time window), followed by;

c. Investigation and implementation of A3 ‘improvements’ between the A320 and the A31.

Thus it is conceivable that no development site adjacent to the A3 will have the required road improvements to make the Local Plan sound within the next 15 years. Unless Highways England steps up its game no A3 site will be sustainable or viable for 20 plus years.

Attached documents:
Policy ID3 Sustainable transport for new developments

1. Policy Para’s (4) and (5) (a)

We are disappointed that the Council is seeking to restrict car usage by way of legal obligation. If adequate parking provision cannot be made as part of a proposed development then planning permission should be refused. This should simply state that ‘All vehicles for new developments must be parked off the adopted highways so, if the highway is to be adopted in the future, parking will be off road.’

2. Para 4.6.24a:

We object to the final sentence in this paragraph. Car-free housing is simply unrealistic and unsustainable. Provision 'somewhere' should be made for all homes to have private transport and chargers for electric cars.

3. Para 4.6.24ba to 4.6.24e

Our concerns are as laid out above with the suggestion that a sentence be included to the effect that the developer must provide adequate parking for the expected on-site needs of the development.

Attached documents:

Policy ID4; Green Blue Infrastructure

1. Policy Para (1) and (2)

‘Where appropriate’ is a very broad get out clause, likely to result in minimal implementation of this policy and should be removed.

Attached documents:

Policy S3; Delivery of development and regeneration within Guildford Town Centre.

We support the general thrust of this policy as it supports a ‘Town Centre first’ approach but are surprised that only 50 additional homes could be found (White Lion Walk) as this fails to meet the Inspector’s requirement to make greater use of the town centre for residential use. The further incursions into the Green Belt elsewhere in the Plan are even less justified when viewed in the context of not maximising residential potential in the urban area, particularly in light of the new ONS data.

Uncertainty in the retail industry continues and we maintain that the Guildford urban area, in particular the North Street Development site, should be revisited to increase the ratio of homes to retail and entertainment. In that regard this policy is too vague to be effective.

4.1.19 Town centre regeneration
This Plan makes no infrastructure provision for bypassing the town centre. As Guildford is a gap town subsection (g) is not viable or sustainable as people need to cross through, not simply stop on the outskirts. Given the lack of major external roads infrastructure in the plan to deal with this issue we recommend the deletion of subsection (g).

4.1.21 Town centre regeneration

We welcome the acknowledgement of the fact that provision of housing in the town centre is critical. The following statement should be removed as unrealistic: ‘Consideration should also be given to the potential to minimise the provision of car parking where this can help optimise the density of development’.

Monitoring Indicators

The Council has failed to find sites to provide a substantive number of new homes within the town centre. Such an exercise is now more pressing given the question mark over the release of Green Belt land following the publication of the latest ONS data. It is not acceptable that there is no specific numeric target for homes in this location, since much of the concern at EiP related to lack of ambition regarding housing provision in the town centre.

Attached documents:

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**Comment:** MM32 - LPMM18/1202 **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505 **Agent:**

**Site Allocations summary Table**

1. Row A60

The Inspector said that the Plan must look to the town centre for more housing. The addition of just 50 extra properties shows a distinct lack of enthusiasm to do this, as all other additional sites are within the existing Green Belt. The Council should redouble efforts to find additional housing in the town centre area.

Attached documents:

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**Comment:** MM32 - LPMM18/1208 **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505 **Agent:**

**Policy A60 White Lion Walk**

We welcome the use of town centre land for residential, in addition to the continued use of retail at ground floor level. Please see above reference regarding car free sites - if redevelopment is to occur, it is quite feasible to make an underground car park and delivery area for the stores in this location. We believe that this site is not viable for redevelopment in the first five years of the Plan.

Attached documents:

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**Comment:** MM33 - LPMM18/1209 **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505 **Agent:**

**Policy A24: Slyfield Area Regeneration**

We are concerned over the lack of realistic prospects of the sewage works actually ever being moved, given the historic
delays. The treatment plant is essential to support all new residential sites. A more practical and rational approach should be taken as to its future use to ensure sewer capacity is forthcoming at the earliest opportunity.

**Transport Strategy:**
There is no known entrance to this site after 15 years of deliberations. A fully worked up entrance should be included via the Bellfield’s roundabout and the land safeguarded within the policy.

**Attached documents:**

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**Comment:** MM35 - LPMM18/1210 **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505 **Agent:**

**Policy A25: Gosden Hill Farm, Merrow Lane, Guildford**

We welcome the reduction to the proposed housing numbers on this site, despite our concerns regarding this allocation. The Plan needs to be consistent throughout as to whether it is referring to housing delivery numbers within the Plan period or on the site as a whole (see comments above).

We welcome the reduction in traveller pitches. See our comments above as to the wider concerns regarding lack of movement/pitch turnover amongst the travelling community.

**Policy Box, Transport strategy and other infrastructure**

The transport strategy is unsustainable for the following reasons:-

1. This wording suggests an all-ways junction onto the A247. However the location described is too far north of its required location to provide a solution to future traffic problems. The junction is required south west of the A247, not on the A247.

2. This is a cost saving measure, not a practical planning solution to traffic problems. In addition the wording is very loose and will not guarantee a solution.

3. The Sustainable Movement Corridor is yet to be proven viable or sustainable. The London Road in Burpham is not capable of being widened to accommodate additional bus and continuous cycle lanes. Delaying the progress of private vehicles along the London Road and giving preference/right of way to public transport vehicles is unsound due to location and cost of getting to destinations of travel by local residents. The proposed park and ride buses (which do not ‘stop en route’) should use the A3 to access the town centre via the A320 Stoke Road and return the same way through an all-ways junction to the north of the site at Potters Lane. Note: The return journey via the proposed A247 route is not a viable park and ride bus route as this will increase the return journey by several miles, resulting in unacceptable journey times.

4. The provision of new bus services into this area (Burpham) is totally impractical when local bus services have been cut due to congestion within Burpham housing estates.

5. The site is not within reasonable walking distance of Guildford urban area amenities, and is highly dangerous for cyclists due to volume of traffic.

6. In the 1980’s Guildford Borough Council raised concerns (during the 1980’s appeal) that the presence of a railway station at this location would make any housing estate a dormitory for London rather than providing housing for residents of Guildford. We share these ongoing concerns today.

7. The implications of development of this site on the local road network will be substantial. Mitigation after the fact, via financial contributions, is an unacceptable approach. Supporting infrastructure must be an integral part of the development plan, not ignored during the planning process, or provision made elsewhere.
**Policy A25; Other Infrastructure**

(14) This is poorly worded and makes no attempt to better the situation. This should read ‘Run-off does not exceed current average rates. Any additional rates of run-off should be controlled by balancing ponds to ensure this rate is not exceeded during times of high rainfall or flooding.’

(25) We welcome the additional landscaping buffer requirement between Gosden Hill and the A3. However this could be enhanced further with the addition of a commitment ‘To have regard to the cumulative visual impact of all new site allocations along this section of the A3’.

(28) The wording should include the words ‘without using the back country lanes known as "Merrow Lane" and "New Inn Lane" as routes to and from this site by vehicular traffic.’

**Policy A25; Box Opportunities**

(3) This route should specify leaving the site at the location of the proposed new railway station, about which we have raised concerns, and connecting with the A25 without interfering with local traffic on Merrow Lane or Park Lane. This would be a similar proposal to the expanded Blackwell Farm exit onto a main road.

(6) This proposal clearly acknowledges the justified need for an ‘all-ways junction’ to the London side of the Gosden Hill site. Indeed this was proposed as part of the failed appeal application on this site in the 1980’s. However the position of the current overall road proposals fails to provide a ‘realistic solution’ as opposed to a ‘very poor mitigation’ to the known problem. The all-ways should be located closer to Potters Lane, forming a 'tight layout' all-ways junction serving both Gosden Hill and the industrial site at Burnt Common. As currently worded the proposals for any it is simply too close to the M25 and with a high level of land-take. In our view the allways junction should be located south of the A247 and not on it.

2. Row A25
This number is underscored at 1,800 while previously it has been reduced to 1,700. This is inconsistent with earlier references. The correct number is 1,700 within the Plan period. This needs further clarification re site allocation and Plan period allocation as these were previously different.

**Attached documents:**

**Comment:** MM37 - LPMM18/1211 **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505 **Agent:**

**Policy A26a Land access road between A31 Blackwell Farm, Hogs Back, Guildford**

This policy shows clear thought has been given to road layout to serve the development, unlike policy A25 which is devoid of a comprehensive assessment. A new Policy A25a should be included in the Plan to provide a rear exit route from the Gosden Hill site and should cover a route to the A25 from the Gosden Hill site onto the park and ride roundabout at Merrow via the proposed Merrow railway station (a possible underpass). This would provide a direct link between both park and ride sites and their bus services.

**Attached documents:**

**Comment:** MM39 - LPMM18/1204 **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505 **Agent:**

3. Rows A61 – A64
We note all these sites are further releases of Green Belt land rather than finding
increased capacity in urban areas. The additional capacity is akin to one year supply (672) not five (3,360).

Attached documents:

**Comment:** MM40 - LPMM18/1212  **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505  **Agent:**

**Policy A35; Former Wisley airfield, Ockham**

*Policy box requirements (3)*

(3) There is a clear requirement for south facing slips at this location to allow traffic to and from this development to access Guildford. No safeguarded land has been provided for such provision, thus until it is provided this site is unsustainable. We also know that this is a requirement for the RHS Garden Wisley expansion plans located directly opposite on the other side of the A3. Therefore a new policy A35a is required safeguarding land south of the Ockham roundabout for this purpose.

Attached documents:

**Comment:** MM43 - LPMM18/1213  **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505  **Agent:**

**Policy A62 /A63 /A64 new sites**

Aside from being located in the Green Belt, these policies make no mention of infrastructure requirements such as roads and sewer capacity on any site or the specific requirement to provide meaningful upgrades to the existing infrastructure.

3. Rows A61 – A64

We note all these sites are further releases of Green Belt land rather than finding increased capacity in urban areas. The additional capacity is akin to one year supply (672) not five (3,360).

Attached documents:

**Comment:** MM44 - LPMM18/1214  **Respondent:** Burpham Neighbourhood Forum (Jim Allen) 8581505  **Agent:**

**Policy A62 /A63 /A64 new sites**

Aside from being located in the Green Belt, these policies make no mention of infrastructure requirements such as roads and sewer capacity on any site or the specific requirement to provide meaningful upgrades to the existing infrastructure.

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3. Rows A61 – A64
We note all these sites are further releases of Green Belt land rather than finding increased capacity in urban areas. The additional capacity is akin to one year supply (672) not five (3,360).

Policy H2; Affordable Homes

(2) We support the uplifting of the threshold from 5 to 10 as this allows more flexibility for affordable units on site.

(4) This is a positive move forward but steps must be put in place to ensure that legal boundaries are included to provide the legal tools for planning enforcement and legal officers to ensure no deviation from the legal agreement.

Policy H3; Rural Exception Homes

The wording leaves Green Belt and the definition of travellers open to abuse. We therefore object to this new wording. Furthermore the revised wording allows for market housing in rural exception sites for the first time. This would set an unacceptable precedent for Rural exception sites and should be removed.

This amendment refers to the revised NPPF of July 2018 and therefore the whole Plan must comply with it.
Policy P2: Green Belt

(2) The wording should be amended to state ‘in accordance with the latest NPPF’.

Green Belt Limited Infilling

This wording should be deleted as it contradicts the purpose of insetting i.e. it allows for development within the Green Belt outside either the original village boundary or the new inset village boundary, raising a serious question mark over the planning value of any village boundary line. This statement opens up the whole of the Green Belt around a village, as 'infill' is not specifically defined within the NPPF and thus has an ‘open’ definition.

The village boundaries should be comprehensively thought through so as to make this wording redundant. This wording is a hangover from when the villages were washed over by Green Belt in the previous Local Plan. As the villages are no longer washed over, the wording should be removed.

Attached documents:

Comment: MM43 - LPMM18/37  Respondent: Mrs Joan Garcia 8581921  Agent:

I am writing to comment on the Sites Summary Table – Ref A62 – 80 homes at Hornhatch Farm, Chilworth, and related Policy number A62.

I imagine that I am wasting my time protesting yet again about the inappropriate nature of further construction in Chilworth, since you have ignored previous criticisms.

However, it needs to be said again, that this planned site will add to the already heavy congestion in Chilworth village and on Christmas Hill, particularly at peak times, both in rush hours and at school start and finishing times. Already, there are long delays in driving from Chilworth to the junction at Christmas Hill, and then further delays heading on Christmas Hill towards Shalford.

Further, the amount of traffic rushing back and forward, at speeds far in excess of 30mph, from Chilworth Village past my home in Pine View Close at the Albury end of Chilworth, is ever-increasing, noisy and careless of residents’ safety. I can only imagine that 80 more homes will add around 160 more cars making repeated journeys along this road.

Your ‘Key Considerations’ in Policy A62 do not even include traffic control and congestion. At the very least you might add that. We already need a roundabout at the junction of New Road and Christmas Hill, and there must be some form of improved speed control along New Road and Dorking Road through to the eastern end of Chilworth village. However, even with these, the proposal will complete the change of our village into a suburb of Guildford, and the road through the village will become even more like a Guildford by-pass.

Attached documents:

Comment: MM45 - LPMM18/4904  Respondent: The House of Commons (Jonathan Lord MP) 8583137  Agent:

Ref. MM45, Policy A64.

I write as the Member of Parliament for Woking. My constituency includes (and has always included) the Guildford Borough village of Normandy.
Specifically, I write to OBJECT strongly to the above Proposal and I would respectfully request GBC to remove site A64 from the revised draft Local Plan.

In doing so, I concur with the reasons set out in the email that I enclose below by Normandy's County Councillor Keith Witham.

Thank you for taking my views into consideration in this consultation. I am sure you will have received many further submissions from the residents of Normandy, who are very concerned about the likely impact of this proposal and who wish to retain all the Green Belt land that makes their village such a pleasant place in which to live.

I OBJECT to this Proposal and ask GBC to remove site A64 from the revised draft plan.

My main concern is the effect of this proposed development site for 105 new homes are the effects on traffic, road safety and congestion. Glaziers Lane is a "D" road and over 100 new homes would add at least 150 cars onto the local roads daily.

The 'exceptional circumstances' that are needed to redraw the Green Belt boundary in Normandy have not been shown.

GBC should further review the overall housing number in the Local Plan as the current number may be exaggerated, failing to take into account the latest housing projections from the Office of National Statistics, which suggest the numbers in the Plan are overstated by 45%.

The lack of a convincing justification for site A64 in particular suggests that it was inserted just to respond to the Inspector's challenge, taking no account of the circumstances of its location.

A large part of site A64 is a fishing lake and it is not even clear that all of it is even available for development.

The road and sewerage systems in Normandy are already stretched and 7% more houses - all to be built over a three-year period - will create a significant additional burden.

Although included as a 'Main Modification' to the Local Plan no accompanying improvements to infrastructure are suggested. There are no existing facilities in Flexford and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality. This site only places long term strain on the community without conferring any community benefit.

I believe that Normandy residents have shown in their responses to previous Local Plan consultations that they clearly want to preserve the rural nature of the Normandy/Flexford community.

Attached documents:

Comment: MM13 - LPMM18/5947  Respondent: Jennie Kyte 8585601  Agent:

MM31  (Policy A6)       North Street redevelopment, Guildford

A reliable up-to-date retail study should be a matter of urgency. An over-expansion of retail when retail is shrinking would threaten the High St as a historic retail street.

Attached documents:
Comment: MM2 - LPMM18/5942  Respondent: Jennie Kyte 8585601  Agent:

MM2 (Policy S2) Planning for the borough – our spatial development strategy

The Plan is unsound because it is based on out-of-date unsound data.

To take account of the latest population projections for Guildford and the new standard OAN methodology, the Examination of the Local Plan for this policy should be re-opened. It has been shown by Neil McDonald, an expert, that 360 homes per year would fulfill need and economic growth. The decrease in the housing figure means that less Green Belt needs to be built upon.

Furthermore Woking’s need should decrease with the new ONS figures.

Attached documents:

Comment: MM22 - LPMM18/5946  Respondent: Jennie Kyte 8585601  Agent:

MM22 (Policy D1) Place Shaping

The excellent section outlining design and character for new developments, which has been deleted from Policy D4, should be reinstated in full in Policy D1. This section needs including, particularly in view of the time lag before supplementary documents will be produced. New estates will be designed well before estates are built, particularly if they are clones of estates elsewhere. Consequently guidelines are needed sooner rather than later.

- 2nd sentence: New development in the town centre should not impact on residential areas and other surrounding areas, such as height of buildings, loss of views, rat runs, etc. This needs including to explain the words “with clear thought given to the interrelationship of land use to external space” in the second sentence of no.(1).

Distinct local character

(4) 2nd sentence: The word ‘will’ should be replaced with the word ‘must’, eg.

‘Proposals must take account of local design guidance .....’

‘The Residential Design Guide ‘ and ‘Landscape Character Assessment’ (extremely useful and much used documents) should be added to the list after the words “conservation area appraisals”, eg.,

‘Proposals must take account of local design guidance contained within conservation area appraisals, the Residential Design Guide, Landscape Character Assessment, DPD’s, neighbourhood plans and SPDs.’

(4) New development should follow the lie of the land both at ground level and roof level, a typical feature of houses and buildings in Guildford, which is built on hills and slopes. Buildings which follow the topography of Guildford enhance both near and distant views.

Over-high buildings, out of harmony with their surroundings, are harmful to views.

Flat roofed buildings are ugly in views and out of keeping with Guildford’s character.
The height of development in the countryside should be restricted in line with their countryside setting, and also the height of new development in the town.

Such locally distinct patterns of development should be reflected and safeguarded in this policy, particularly in view of the time lag before supplementary documents are produced. New estates and buildings will be designed well before they are built, particularly if they are clones of estates elsewhere.

(5) All new development should reflect locally distinct pattern of development. New estates need to avoid being inappropriate clones of estates built elsewhere in the country, which have no connection to Guildford or its hilly landscape with views.

New estates must not downgrade existing views or introduce views out of character with Guildford’s landscape, particularly when visible from the AONB, or harm character in adjoining areas.

Attached documents:

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**Comment:** MM3 - LPMM18/5943  **Respondent:** Jennie Kyte 8585601  **Agent:**

**MM3 (Policy S3)  Place shaping and character and design of new development**

(5) b  The words ‘at both ground and roof level’ should be added, eg.

‘*the historic environment, street pattern and topography at both ground and roof level.*’

(5) c  The words ‘including the AONB’ should be added, eg.

‘*important views (including the AONB) into and out of the town centre from the surrounding landscape.*’

(6) e  The words ‘and from’ should be added, eg.

‘*improved access and views to and from the River Wey*’

**4.4.18 (c): Improving the public realm, including surfaces, in key town centre areas**

The words ‘where appropriate’ should be added, eg.

‘*Improving the public realm, including surfaces, where appropriate, in key town centre areas.*’

(Surfaces of heritage streets and alleyways with setts, pavements and sloping topography in key town centre areas should be protected. Their surfaces are in keeping with the High St and should be retained and upkept.)

**4.1.25  2nd sentence:** Add the words ‘*where appropriate*’ after the words ‘…… such as improving surfacing of public space ……’.

(Comment as above)

**2nd sentence:** Add the words at the end of the sentence: ‘in areas which need’
enhancing’

(Public art should be positioned carefully so as not to litter or overload streets and landscapes which are already beautiful. It should only be used in areas which need enhancing)

2nd sentence: Add the word ‘planting trees’ after the word “landscaping”.

(Trees greatly enhance towns, particularly large trees when planted in places where they do not obstruct views)

1. 2nd sentence as follows:

“This could occur through a range of interventions such as improving, where appropriate, surfacing of public space, providing more generous pedestrian environments, landscaping, planting trees, street furniture, lighting, and public art in areas which need enhancing. ”

4.1.19 This policy and the Town Centre Regeneration Strategy will help deliver the following objectives

There is no mention of a bus station/exchange with buses radiating out in all directions (important in a gap town). A bus station/exchange is essential for sustainable transport. This should part of the Town Centre Regeneration Strategy.

- The River Wey and its riverside should be a green wildlife corridor through the Borough. Its natural character and setting must not be harmed through over development close to the river, ugly or non-descript buildings or unnatural hard surfaces.

4.2.24/25 The town centre needs a Master Plan. However, any Master Plan needs to protect rather than destroy Guildford’s heritage. Its heritage has diminished over the years and in particular all remaining buildings in the High St need to be retained as well as the Town Bridge.

Any Master Plan should resist expanding concrete alongside the river.

Attached documents:

Comment: MM32 - LPMM18/5948  Respondent: Jennie Kyte 8585601  Agent:

MM32 (Policy A60) White Lion Walk, High Street Guildford

Part of Guildford’s charm is its small shops. Larger retail premises will be taken over by chains. Both chains and smaller shops have vacated premises during the decline in retail. Before sacrificing smaller premises, evidence is needed that larger shops will be commercially more viable, or will they migrate from the High St leaving behind vacated premises.
(The former shop ‘River Island’ on a large corner site in the High St, was split into two small shops after it vacated its premises.)

The height of White Lion Walk needs to be restricted in line with the character of the High St and the architecture needs to live up to the beauty of its surroundings.

**Attached documents:**

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**Comment: MM7 - LPMM18/5944  Respondent: Jennie Kyte 8585601  Agent:**

**MM7  (Policy H3)  Rural Exception Homes**

**a, b and c.** Market housing should not be allowed to be built in rural exception sites.

**Attached documents:**

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**Comment: MM9 - LPMM18/5945  Respondent: Jennie Kyte 8585601  Agent:**

**MM9  (Policy P2)  Green Belt**

**Limited Infilling**

**(c) No infilling should be allowed outside identified settlement boundaries.**

This would harm the openness of the Green Belt and could be a ‘Trojan Horse’.

**Attached documents:**

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**Comment: MM27 - LPMM18/2249  Respondent: Leslie Brown 8586017  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC seem to be intent on joining Send to Ripley and changing them from villages into towns. I am also unclear as to who all this additional housing is for, because there is no industrial development which requires more people to live in the
area and the type of housing proposed is not low cost housing which would be affordable to most. Furthermore no mention has been made of the number of people the Council is seeking to provide accommodation for.

Attached documents:

Comment: MM41 - LPMM18/2245  Respondent: Leslie Brown 8586017  Agent:

The Guildford Local Plan

So once again we have the opportunity to comment on your planning proposals.

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

I object to the proposal to increase the number of homes on this site from 400 to 550. I objected to the original proposal and now the number has been increased by 37%. Potentially an additional 1000 residents and possibly about 750 cars to add to the traffic in the surrounding area. Access to both Guildford and Woking would add to the incessant traffic at present at Send Dip and the Burnt Common Roundabout. Send Road is already the main access road between Woking and the M25 carrying heavy goods vehicles and articulated trucks. Today the 20th October temporary traffic lights at the Old Woking roundabout prior to road works in this coming week have resulted in long tail backs in both directions and today is Saturday. The situation will be far worse during the ensuing weekdays. The additional traffic which will result from the excessive building programme in Send will make the situation far worse and in all probability result in gridlock. This is quite apart from the need for additional school places made worse by the recent closure of Ripley School.

Attached documents:

Comment: MM41 - LPMM18/2250  Respondent: Leslie Brown 8586017  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC seem to be intent on joining Send to Ripley and changing them from villages into towns. I am also unclear as to who all this additional housing is for, because there is no industrial development which requires more people to live in the area and the type of housing proposed is not low cost housing which would be affordable to most. Furthermore no mention has been made of the number of people the Council is seeking to provide accommodation for.

Attached documents:

Comment: MM42 - LPMM18/2246  Respondent: Leslie Brown 8586017  Agent:

MM42 Land at Burnt Common, London Road Send, Policy A58

148 of 2554
I object and am amazed at the proposal now to double the original area proposed especially in view of the increased capacity at the Send Business Centre and the spare capacity at Slyfield. This will also generate additional traffic consisting of vans and larger vehicles.

Attached documents:

Comment: MM42 - LPMM18/2251  Respondent: Leslie Brown 8586017  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC seem to be intent on joining Send to Ripley and changing them from villages into towns. I am also unclear as to who all this additional housing is for, because there is no industrial development which requires more people to live in the area and the type of housing proposed is not low cost housing which would be affordable to most. Furthermore no mention has been made of the number of people the Council is seeking to provide accommodation for.

Attached documents:

Comment: MM44 - LPMM18/2247  Respondent: Leslie Brown 8586017  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

I object to the proposal for 120 homes at this location which is a wholly unsuitable development in such an area and for the same reasons as the other locations in Send namely excessive pressure on local services and additional traffic on a road system which was never intended for such potential traffic volumes.

Attached documents:

Comment: MM48 - LPMM18/2252  Respondent: Leslie Brown 8586017  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC seem to be intent on joining Send to Ripley and changing them from villages into towns. I am also unclear as to who all this additional housing is for, because there is no industrial development which requires more people to live in the area and the type of housing proposed is not low cost housing which would be affordable to most. Furthermore no mention has been made of the number of people the Council is seeking to provide accommodation for.

Attached documents:
MM9 Green Belt Policy

This can hardly claim to be a policy when the above developments all impinge on the existing Green Belt which GBC seem prepared to sacrifice.

Attached documents:

GENERAL OBSERVATIONS

For what it is worth I would like to repeat what I have written before, that whilst so much of what the Council does on behalf of the community is taken for granted, probably with very little expression of gratitude, I personally am much more critical of the Local Plan proposals.

We in Send have expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before.

The opening paragraph to the Local Plan states

"Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough's most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, supported by suitable infrastructure including education, healthcare and transport. The new Local Plan will be in place until 2034."

Furthermore there are signs at various points proclaiming "The Surrey Hills an area of Outstanding Natural Beauty."

Yet despite this the Local Plan will considerably increase traffic volumes, transform existing villages into small towns, reduce the benefit of the Green Belt, result in undesirable ribbon development and increased demand for education and health services which are already trying to cope. The scale of the plan is such that it will inevitably have a negative effect on the whole area.

I regret to say that I remain disappointed in the Council's objectives and total disregard of public opinion which has been expressed consistently at meetings and in letters of objection by residents deeply concerned with their environment and have great affection for Send in particular and their way of life. I would like to feel that GBC are more in tune with those who represent and willing to heed and be much more supportive of their concerns expressed in the thousands of letters they have recieved and especially from Send residents. I'm afraid I remain disappointed, sceptical and suspicious of GBC's motives and objectives which seem to be at odds with the wishes of the community they serve.

Attached documents:

Comment: MM27 - LPMM18/3498 Respondent: Trans Lease Services (Mrs Lisa Scott) 8586625 Agent:

MM27, MM41, MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

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**Comment:** MM41 - LPMM18/3484  **Respondent:** Trans Lease Services (Mrs Lisa Scott) 8586625  **Agent:**

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The increase from 400 to 550 homes of which 450 to be built in the first five years

- It is Green Belt containing ancient woodland
- An increase of 37% in the number of houses proposed is excessive
- 7000 ejections to the previous lower number have been ignored
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

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**Comment:** MM42 - LPMM18/3493  **Respondent:** Trans Lease Services (Mrs Lisa Scott) 8586625  **Agent:**

MM42 Land at Burnt Common, London Road, Send, Policy A58

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerously high.

Attached documents:
Comment: MM44 - LPMM18/3495  Respondent: Trans Lease Services (Mrs Lisa Scott) 8586625  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July.
- It is a Green Belt site with no special circumstances so it also contradicts Policy MM9.
- It will detract from the heritage buildings at Send Marsh Green.
- The additional traffic will increase pressure on the Send Crossroads.
- With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/3512  Respondent: Trans Lease Services (Mrs Lisa Scott) 8586625  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM9 - LPMM18/3497  Respondent: Trans Lease Services (Mrs Lisa Scott) 8586625  Agent:

MM9 Green Belt Policy

Although the ‘modifications’ claim to protect the Green Belt except in very special circumstances GBC make an exception for ‘limited infilling outside of the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents and the environment.

Attached documents:

Comment: MM2 - LPMM18/2785  Respondent: Liz Hyland 8586721  Agent:
I am a member of the Burpham Neighbourhood Forum, I understand that the latest ONS figures show much lower population projection numbers and therefore the projected housing numbers have significantly reduced. I feel that the Burpham Neighbourhood Forum and the Guildford Residents Association should be allowed to make representation to the Inspector on this subject. There should no longer be any need to consider the Gosden Hill Development where there would be no defensible Green Belt Line.

Guildford is one of the most congested towns in the country and the proposed transport strategy does little to improve this. Failure to address this issue can only threaten the economic viability of Guildford.

With the future of Retail changing so significantly further sites for residential development should be identified in the town centre.

Attached documents:

Comment: MM2 - LPMM18/5087  Respondent: Elizabeth Critchfield 8586785  Agent:

MM2

• The ONS publication of revised housing figures nullifies the proposed figure of 672 homes per year in the Local Plan. Neil MacDonald, the expert advisor to the Guildford Residents’ Association, has shown that 360 homes a year would support the economic growth proposed by the Inspector.
• Guildford should not be expected to give up its Green Belt to provide homes for Woking.

I ask that the Examination be re-opened as the revised housing figures render the Plan unsound.

Attached documents:

Comment: MM23 - LPMM18/5089  Respondent: Elizabeth Critchfield 8586785  Agent:

MM23

• Strategic sites should be required to reflect locally distinct characteristics.

Attached documents:

Comment: MM3 - LPMM18/5088  Respondent: Elizabeth Critchfield 8586785  Agent:

MM3

• Any new town centre development should not cause any adverse impact on surrounding residential areas. Burpham has already been blighted by unsympathetic development and I would urge that consideration be given to a policy aimed at preventing inappropriate garden grabbing.

Attached documents:
Comment: MM35 - LPMM18/5090  Respondent: Elizabeth Critchfield 8586785  Agent:

MM35

- Revised housing figures lessen the justification for Green Belt development. The proposed 1800 homes on Gosden Hill Farm would have a huge impact on Burpham, especially the influx of so much extra traffic on already congested roads, and I would ask that this strategic site be dropped from the Plan.

Attached documents:

Comment: MM2 - LPMM18/3575  Respondent: Linda Parker-Picken 8587105  Agent:

MM2 Spatial development strategy and housing numbers – the latest ONS figures are for a reduced population increase of 301pa. Guildford could now expect to have around 5,500 fewer households at the end of the plan period that was predicted by the data that formed the basis of the debate at the Examination.

It is not sensible to attempt to provide for Woking’s shortfall in meeting its housing targets by allocating further housing in Send which is situated between Woking and Guildford; and which will turn it into a community almost one and a half times its current size and no longer a small village with a buffer of green land between it and Woking.

Modifications should only be made if the Plan is found unsound, which was not the case. However, additions were made in the Send area as below. Send parish now accounts for 56% of proposed development supply in villages (based on the table at MM2). This community cannot support all this development, which will completely change the character of the parish, with its three distinct settlements of Send, Send Marsh and Burnt Common, as reflected by our parish logo:

Attached documents:

Comment: MM23 - LPMM18/3582  Respondent: Linda Parker-Picken 8587105  Agent:

MM23 states: all new development will be designed to maximise the opportunity for and linkages between green spaces and public places, and include high quality landscaping that reflects the local distinctive character. The allocations at Alderton’s and Garlick’s Arch are designed to destroy green spaces and the local distinctive character!

MM23 further requires that a new site “provides access to services from a range of providers.” The above two sites will not be able to fulfil this requirement since the school is at capacity and Ripley School has recently closed; the Medical Centre is at capacity; and there are only small shops locally.

Attached documents:

Comment: MM29 - LPMM18/3583  Respondent: Linda Parker-Picken 8587105  Agent:

ID4 MM29: The Council will maintain, conserve and enhance biodiversity. How is that possible with such a lot of development on Green Belt land??

Attached documents:
A35 MM40. The increase in the minimum floor space at Burnt Common warehouse site is unreasonable due to the already heavy traffic in and around this site. The Employment Lands Needs Assessment showed a reduction in demand for Industrial Land. There is no need for new industrial sites when Slyfield has unused capacity.

Other off-site highway works to mitigate the impacts of the development makes no mention of the A247 through Send, which would inevitably carry more traffic from the Wisley Airfield development to Woking.

MM41 – Policy A43. At the Public Enquiry, the only reason put forward for increasing the housing number at Garlick’s Arch to 550 was that the developers would be able to help fill quotas in the first five years of the Plan. That is a completely spurious planning argument. The objections to the original 400 houses were clearly expressed: problems with traffic, flooding, contaminated land, disturbance to ancient woodland and the fact that this is Green Belt land. This housing would link Burnt Common and Ripley, which are currently separated by green land. There is an acknowledgement, in the addition of wording at MM41, of the argument that Garlick’s Arch is poorly related as a site to both the existing built form of the villages and the services provided by Send. Send does not have the capacity to service this additional growth in housing. MM17.

Site MM44. The land at Alderton’s Farm was removed following the 2014 consultation. It is now suggested to add it back. It is Green Belt and flood land and those reasons for it not being built on are still valid. It also forms a green break between Send and Send Marsh.

MM44 “Opportunities”

1. Green corridors and linkages to habitats outside of the site
   These are not opportunities! The existing corridors and linkages will be reduced!

2. Encourage connections with services and facilities in the village.
   These are already at capacity. As for shops, we have recently lost both the Post Office/ General Store and Patel’s newsagents, which have both become residential accommodation. And the local hairdresser is closed.
MM14. I can see no justification for further allocations for leisure and retail. High street shopping is declining and this area is adequately provided for re leisure.

I hope you will bear these comments in mind when finalising the Local Plan and in particular reduce the horrendous proposed increase in both housing and industrial development in the Send area.

Comment: MM4 - LPMM18/1549  Respondent: Michael R. Murphy 8589953  Agent:

My initial objection is to: MM41, MM42, MM44, MM9, MM27.

POLICY S2.

At the public examination the figure for Guildford B.C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated.

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in G BC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspect.
I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

Attached documents:

Comment: MM27 - LPMM18/1550  Respondent: Michael R. Murphy 8589953  Agent:

MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account ?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM41 - LPMM18/1551  Respondent: Michael R. Murphy 8589953  Agent:

MM41 Land at Garlicks Arch, Send Marsh. Policy A43.

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.

This is an increase of 37% in the number of houses to be built and I can only assume that the Conservative Guildford Borough Council are punishing Send for throwing out the Conservative Councillors and electing Green Belt Councillors.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking.

This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

This site is contaminated by many years of Clay Pigeon Shooting and is prone to frequent flooding.

Up to a thousand cars and between 1600 to 1700 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

I am Chairman of our Local Patients Participation Group and confirm that our local Health Centre is already oversubscribed and working in overwhelming conditions.

There is no money to build any extension or employ more health staff.

Why have over 7000 objections to the earlier plan been ignored and more houses etc added ?
MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM42 - LPMM18/1552  Respondent: Michael R. Murphy 8589953  Agent:

MM42. Land at Burnt Common,London road Send Policy A58.

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land why has again Send been picked on again to have the largest industrial allocation in any village in the Borough, is it politics?

This is a further increase of 25% making it a huge increase in Send, bigger than any other village.

There is no need for new industrial sites when Slyfield is has unused capacity There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.

There is no need to put Industrial premises in our precious GREEN BELT, except if as a Council Cabinet you want to punish Send.

This plan has since being deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.

MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

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Attached documents:
Comment: MM44 - LPMM18/1553  Respondent: Michael R. Murphy 8589953  Agent:

MM44 Land at Aldertons Farm, Send Road, Policy A63.

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY.

With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%

How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment.

Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

Attached documents:

Comment: MM48 - LPMM18/1554  Respondent: Michael R. Murphy 8589953  Agent:

MM27. MM41. MM42. and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on Send Barns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM9 - LPMM18/1556  Respondent: Michael R. Murphy 8589953  Agent:

MM9 GREEN BELT POLICY.

How can you say the modifications claim to protect our precious GREEN BELT except in very special circumstances?

GBC make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN

BE DEMONSTRATED THAT THE SITE SHUOLD BE CONSIDERED TO BE WITHIN THE VILLAGE.

This is a catch all statement which is completely subjective causing complete uncertainty and completely negates GREEN BELT PROTECTION.
Virtually any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish the above objections to be considered and this huge imposition of housing and commercial development to be largely abandoned as Send Village is at present at bursting point.

Attached documents:

Comment: MM27 - LPMM18/2263  Respondent: Mr Michael J Harris 8590209  Agent:

Traffic Snarl up

Should all the above mentioned and the formerly proposed developments go ahead, and the new London bound entry and exit slip roads to the A3 by the A247 bridge also be constructed, then traffic will be totally gridlocked around the A247/ B2215 roundabout at Burntcommon, by the Shell petrol station/Little Waitrose. As the only access to and from Boughton Hall Avenue is just 50 metres or so from this roundabout, on to the B2215, I have serious doubts as to whether our residents will actually be able to get in or out of this Avenue, at rush hours particularly. Portsmouth Road will be jammed from Kihl Lane/Send Marsh Road to the roundabout; Clandon Road (A247) will be queueing probably from about West Clandon station to the A3 slip road, whilst Send Road will be solid with traffic for its whole length from the Old Woking roundabout. Traffic trying to exit the A3 from Guildford will be clogging up the whole of the 1/2 mile slip road to Burntcommon roundabout, and probably back on to the A3 itself. Very, very dangerous!

It seems to me that there has been very little, if any, real thought or planning given to the infrastructure problems that will occur due to all this development. What about lack of school spaces? And the local Villages Medical Centre? There is only just about enough capacity in these facilities NOW.

I attended the special Send Parish Council meeting at the Lancaster Hall on Tuesday 14th June 2016. Also present were Cllrs Paul Spooner and Matt Furniss, plus our local borough councillors Cllrs Mike Hurdle and Susan Parker (both of whom spoke against the Plan). The Hall was packed full of very angry local residents!! [text redacted: the text included a quote that was not wholly accurate] They emphasised this. I cannot help but wonder whether this was merely political assurances, given in order to appease the locals, or whether it will actually be written into the Local Development Plan as a positive legal requirement before planning approvals are handed out wholesale to hungry developers!!

I ask that a copy of this letter be passed on to the Government's Planning Inspector.

Attached documents:

Comment: MM41 - LPMM18/2260  Respondent: Mr Michael J Harris 8590209  Agent:

Main Modifications to Guildford Local Plan

I am aghast at the Modifications to the Local Development Plan that you have released for public consultation by 23rd October 2018, particularly in regard to our villages of Send, Send Marsh and Burntcommon.

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The proposed increase in homes on this site from 400 to 550 is absolutely preposterous, being an increase of 47% on the previous proposal. This site is Green Belt land anyway, and is subject to frequent flooding, apart from which at least some of the site is contaminated by lead shot caused by the firing range on it, which has been in operation for many years.
Part of the land contains ancient woodland, which simply must not be interfered with. 550 homes on this site is gross over development and will cause a further 800 or so cars to be trying to use the adjacent roads, which are over busy already. The local schools cannot cope with such a massive increase in pupils and the Villages Medical Centre will be strained to breaking point with so many additional residents in its area.

Attached documents:

Comment: MM42 - LPMM18/2262  Respondent: Mr Michael J Harris 8590209  Agent:

**MM42 Land at Burntcommon, London Road, Send, Policy A58**

This site, once again, is Green Belt land! The proposed industrial and storage area has now been increased by more than double the original plans, and is by far the largest amount of new industrial allocation in any of this borough's villages.

Slyfield already has unused capacity and therefore there is no need to use this Green Belt area for new industry or storage. Once again, there are no special circumstances and Policy MM9 is also contravened.

There is a reduction in demand for industrial land, as shown in the Employment Land Needs Assessment.

There is also the problem of much increased commercial traffic in surrounding roads, there being no proposal for a direct access either to or from the A3 for this site. This means that the Burntcommon Roundabout on the A247/B2215 crossroads (the only means of access to and exit from this site!) will be further gummed up with traffic than it is at present, and will lead to gridlock at peak times, together with another increase in nitrogen dioxide levels, which are already dangerous.

Attached documents:

Comment: MM44 - LPMM18/2261  Respondent: Mr Michael J Harris 8590209  Agent:

**MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63**

I am appalled that this site, which was deleted from an earlier draft due to the many objections, has now been added in once again. Together with all the other proposals for new housing in Send, it will mean an increase of about 45% in Send housing, and will cause much additional traffic on these local roads, crossroads and T junctions. As with the Garlicks Arch site, it will put an unsustainable pressure on both local schools and our surgery. It is, as is well known by your Council, within the Green Belt, and there are no special circumstances for using it for development, thus it contravenes Policy MM9.

Part of the site is often flooded and marshy in very wet weather, and therefore most unsuitable for housing development. (See the photo that I included with my letter a few years ago in one of the original consultations). A final point is that I believe that this development would detract from the heritage buildings at Send Marsh Green.

Attached documents:

Comment: MM1 - LPMM18/5049  Respondent: Surrey Wildlife Trust (Mike Waite) 8591041  Agent:
To whom it may concern:

Thank you for this opportunity to comment further on your emerging Local Plan for Guildford Borough. Please consider these comments as both those of **Surrey Wildlife Trust** and the **Surrey Nature Partnership**, unless clearly indicated otherwise(*). The Surrey Wildlife Trust last commented on this matter in July 2017. The Surrey Nature Partnership is the government-mandated Local Nature Partnership for Surrey.

**Policy S1.**

**Paragraph 4.1.4.** The purpose of these modifications (from the previously consulted draft) appears to reflect changes to the National Planning Policy Framework revised in July 2018. If this is the case the list of features relevant to Guildford to which the presumption (in favour of sustainable development) will not automatically apply is not complete; ‘irreplaceable habitats’ have been omitted.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5050</th>
<th>Respondent: Surrey Wildlife Trust (Mike Waite) 8591041</th>
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<tbody>
<tr>
<td><strong>Policy S2.</strong></td>
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<tr>
<td><strong>Paragraph 4.1.9ac.</strong></td>
<td>*The <em>Surrey Wildlife Trust</em> maintains its objection to the net number of homes indicated for the new settlement allocation at Former Wisley Airfield. The Trust remains of the opinion that long-term adverse impacts on sensitive biodiversity interests, both on-site and within the Ockham &amp; Wisley Commons SSSI (which it manages on behalf of Surrey County Council), are unavoidable under this scenario.</td>
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<tr>
<td><strong>Policy A25: Gosden Hill Farm, Guildford</strong></td>
<td>*The <em>Surrey Wildlife Trust</em> maintains its reservation for further representation on the individual development management decisions at this site.</td>
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<tr>
<td><strong>Policy A26: Blackwell Farm, Guildford</strong></td>
<td>*The <em>Surrey Wildlife Trust</em> maintains its reservation for further representation on the individual development management decisions at this site.</td>
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</table>
**Comment: MM40 - LPMM18/5057  Respondent: Surrey Wildlife Trust (Mike Waite) 8591041  Agent:**

| Policy A35: Land at former Wisley Airfield | *The Surrey Wildlife Trust maintains its objection to the scale of development allocated for this site (and see comment above in relation to Policy S2).* |

**Comment: MM41 - LPMM18/5058  Respondent: Surrey Wildlife Trust (Mike Waite) 8591041  Agent:**

| Policy A43: Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley | *The Surrey Wildlife Trust maintains its reservation for further representation on the individual development management decisions at this site.* |

**Comment: MM9 - LPMM18/5051  Respondent: Surrey Wildlife Trust (Mike Waite) 8591041  Agent:**

| Policy P2: Green Belt. | Paragraph 4.3.17. *The Surrey Wildlife Trust believes that the land removed from the Green Belt at the Former Wisley Airfield should be precisely limited by the areal extent of the previously developed footprint of the former airfield.* |

**Comment: MM13 - LPMM18/3224  Respondent: Michael Bruton 8591169  Agent:**
1. MM13. There is overemphasis on retail development in the town centre. Retail requirement everywhere is diminishing - as evidenced by the plight of House of Fraser and John Lewis amongst many others. The space would be better used for housing.

Attached documents:

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Comment: MM2 - LPMM18/3222  
**Respondent:** Michael Bruton 8591169  
**Agent:**

I maintain my OBJECTIONS to the Guildford Local Plan and request that the Examination in Public is reopened so that the latest ONS statistics are used in calculating housing numbers required.

I was not informed of this latest consultation as required. How many of those of us who objected last time were omitted when it came to GBC informing objectors about this consultation?

I support the representations made recently over the Local Plan by the Wisley Action Group. These representations were made I understand on advice received by Richard Harwood QC.

I support the recent representations made by the Guildford Greenbelt Group regarding the Local Plan. In particular, I agree with its comments regarding development at Blackwell Farm, Garlick’s Arch, Send Marsh Road and Burnt Common and Three Farms Meadows/former Wisley airfield.

Detailed Comments:

1. MM2. The housing target is wrong. The latest ONS figures on household projections should be used to calculate housing numbers
2. Guildford cannot and should not be required to take Woking’s unmet need
3. GBC has not followed its spatial strategy which requires that development should take place in the town centre, the urban area and on brownfield land before moving in on the villages and Green Belt

Attached documents:

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Comment: MM23 - LPMM18/3226  
**Respondent:** Michael Bruton 8591169  
**Agent:**

1. MM23 (D1). Waters down the requirement for development linked to walking and cycling. Contrary to policies on sustainability

Strategic sites are exempt from design constraints

Attached documents:

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Comment: MM3 - LPMM18/3227  
**Respondent:** Michael Bruton 8591169  
**Agent:**

1. S3 The town centre policy does not address issues related to the infrastructure deficit.

Attached documents:
Comment: MM40 - LPMM18/3228  Respondent: Michael Bruton 8591169  Agent:

1. Three Farms Meadows:
   1. An appropriate assessment under the Habitats Regulations has not I gather been carried out. If so, such an absence is a breach of case law. 
   2. MM47 – The size of the SNCI will be reduced and much of its biodiversity would be destroyed.
   3. The site would be very visible to and from the Surrey Hills AONB. A clear breach of the objectives of protecting AONBs.
   4. On an Inspector’s recommendation, the site has been rejected already for housing by the Secretary of State

Attached documents:

Comment: MM41 - LPMM18/3225  Respondent: Michael Bruton 8591169  Agent:

1. MM41. Transport strategy relies on inadequate modelling. In particular the delay of J10/M25. There is little certainty that J10 enlargement will take place in the foreseeable future.
2. A3. The Plan relies heavily on the chimera of A3 improvements. Any improvements are not controlled by GBC and reflect its wishful thinking.

Attached documents:

Comment: MM9 - LPMM18/3223  Respondent: Michael Bruton 8591169  Agent:

1. MM9 – infilling around the villages will weaken the protection of the countryside

Attached documents:

Comment: MM2 - LPMM18/5650  Respondent: The House of Commons (Anne Milton MP) 8591329  Agent:

Further to the responses I have submitted previously in the Local Plan process, I write now in response to the consultation on the main modifications required by the Planning Inspector. There are 3 major concerns that I still have:

Firstly, that the Planning Inspector should revisit the housing numbers in the light of the new ONS figures. We are fortunate to have these most recent figures and therefore are in a position to reflect these in the Local Plan. I am sure the Inspector will do this as not to do so would seem absurd and make a nonsense of the whole Local Plan process. (Policy S2)

Secondly whilst it is entirely right that Local Authorities work together and collaborate, taking Woking’s so called unmet need does not further this aim. Guildford has been ambitious in its plan and has gone to considerable lengths to meet our own housing requirements, particularly bearing in mind that 89% of the Borough is Green Belt. However, meeting Woking’s unmet need would place even further strain on Guildford, would not necessarily be the best place to build
houses and would be beyond that which Guildford residents feel is either fair or reasonable. It is simply a step too far. (Policy S2)

Attached documents:

Comment: MM36 - LPMM18/5651  Respondent: The House of Commons (Anne Milton MP) 8591329  Agent:

Thirdly: Blackwell Farm. As Guildford Borough Council is aware, this is very sensitive land and I have made representations on behalf of residents before. I understand that it is suggested that the access road to the A31 should go through the AONB which would have a further detrimental effect on the AONB. I also understand that Highways England are proposing to shut the access on the southbound A3 to Beechcroft Drive whilst we also still await an update on the long term solution to the A3. Access to Blackwell Farm and Beechcroft Drive needs to be achieved in conjunction with the longer term plans for the A3 and we should not bind our hands before making further decisions about the road network in this area which is under considerable strain. I sincerely hope that Guildford Borough Council will look again at this decision. (Policy A26 and A26a)

Attached documents:

Comment: MM37 - LPMM18/5652  Respondent: The House of Commons (Anne Milton MP) 8591329  Agent:

Thirdly: Blackwell Farm. As Guildford Borough Council is aware, this is very sensitive land and I have made representations on behalf of residents before. I understand that it is suggested that the access road to the A31 should go through the AONB which would have a further detrimental effect on the AONB. I also understand that Highways England are proposing to shut the access on the southbound A3 to Beechcroft Drive whilst we also still await an update on the long term solution to the A3. Access to Blackwell Farm and Beechcroft Drive needs to be achieved in conjunction with the longer term plans for the A3 and we should not bind our hands before making further decisions about the road network in this area which is under considerable strain. I sincerely hope that Guildford Borough Council will look again at this decision. (Policy A26 and A26a)

Attached documents:

Comment: MM2 - LPMM18/23  Respondent: Mr Niels Laub 8593185  Agent:

In order to arrive at a robust and sustainable housing target, I believe the following measures need to be taken:

**Demographic indicators or population change**

1. An appropriate factor should be applied to the population projections to allow for “un-attributable population change” or the discrepancy between the population projections for Guildford and the actual population as recorded in the 2011 Census. Taking into account the latest 2016 Based SNPP figures, the objectively assessed housing need based on demographic indicators would be reduced to 192 dwellings per annum if an appropriate allowance for UPC were to be applied.

2. Alternatively, overseas students should be simply removed from statistics used to arrive at net international migration on the grounds that they are only here on a temporary basis to study and not here to settle. The International Student Migration Research Update, published by the ONS last August, concluded that the
International Passenger Survey, on which international migration statistics are based, is likely to underestimate student emigration.

3. All students, including domestic students, who are only here on a temporary basis to study, should be removed both from the statistics used to arrive at Population Projections for Guildford and from statistics used to generate DCLG Household Projections. The student population represents a churn in the population and needs to be dealt with separately. They are not permanent residents.

**Provision of purpose built student accommodation**

1. The accommodation needs of students should be considered quite separately from housing targets and a robust target should be made for the provision of purpose built student accommodation both on campus and in the immediate vicinity of the campus (for instance on the south side of Stag Hill) to provide the students with easy access to university facilities while avoiding the need to commute.

1. A plan should be put in place to withdraw the student population from the local housing market thereby making available a substantial existing stock of affordable housing in the town centre for key workers such as council employees, hospital staff, teachers, shop assistants, policemen, firemen, and young professionals.

**The application of constraints**

1. The Green Belt should be considered as an appropriate constraint on the supply of housing in Guildford in view of paragraph 035 in the PPG which states that - “unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”. The only reason Guildford Borough Council has given for building on the green belt is “to meet unmet housing need” and, according to the PPG, this is unacceptable.

**Comment:** MM2 - LPMM18/27  **Respondent:** Mr Niels Laub 8593185  **Agent:**

It is extraordinary to consider that, if you take natural growth (births and deaths) and net internal migration (movement within the UK), the 2016 Based SNPP published on 24th May, forecast the population of Guildford to actually decline by 2355 from 2016 - 2026. It therefore follows that the overall projected increase in Guildford’s population must be entirely due to the projected growth in net international migration. Considering the fact that the publicly stated policy of the current Conservative government is to reduce net international migration, it seems anomalous that the council should set such a high housing target.

**Attached documents:**

**Comment:** MM2 - LPMM18/1024  **Respondent:** Mr Niels Laub 8593185  **Agent:**

In view of the latest 2016 Based Household Projections released from the ONS on 15th September, which appear to show a 40% reduction in the number of extra households required in the borough of Guildford by the end of the plan period 2034, I believe it would be appropriate to reconsider the objectively assessed housing need for Guildford and, if necessary, to reopen the Examination in Public.

**Attached documents:**
Objections to modification MM41

I object to the number of houses you are proposing in our village. The increase in the numbers for Garlick's Arch were very unpopular when first proposed and have now been increased still further. This development will destroy ancient woodland and join Send and Ripley together as one. Ultimately, this is not good for the villages, and means that pressure will be on then to develop further tracts of land which suddenly will fall 'on the edge of the village'. Increasing the size of any village quickly and in such proportion changes them forever.

This development at Garlick's Arch will stretch the infrastructure and facilities to breaking point. Even with the introduction of any new facilities (which will not be in place before the building will be done and are NEVER guaranteed as developers do not stick to their promises), will bring chaos to the surrounding area as new residents, school children and service vehicles commute in and out. Our village is already a busy one, and it takes very little now to bring everything to a halt.

Attached documents:

Objections to modification MM43

I object to the plan to build a large industrial site at Burnt Common. Where is the evidence that so much industrial space is required in a small village, especially on Green Belt Land? Surrounding roads will be unable to cope with the resulting, probably heavy traffic. This proposal was removed from a previous plan, so I object strongly to its re-introduction at twice the size.

There is empty industrial space all over the Borough. Send already has new industrial development in progress and there is no indication that major works to the A3 will be done before this is intended or that even if done it will alleviate the resulting traffic problems in the village or in Ripley. There does not seem to be any other village with such a huge new industrial development planned. This is unreasonable.

Attached documents:

Objections to Modification MM9 and MM44

I object in the strongest possible way to the plans of the Council to build in the Green Belt on any site, even when (subjectively) it is determined as being on 'within the confines' of a village. Who determines this?

It is a precedent that is extremely dangerous for everyone who loves the land we live in. This specially protected land is meant to give a better quality of life to those who live in the city. The protection of Green Belt land should be seen as sacrosanct and to build on this when there are no special circumstances removes the rights of our descendants.

The Land at Alderton's Farm is one which together with other planned developments for the area is likely to increase traffic and pollution with no real advantages for the village, only the profit of the developers. Roads in this area are narrow and twisting and the introduction of several hundred cars is not going to make life pleasant for those living
nearby. It also raises the possibility of unsuitable, narrow roads without footpaths being used as cut-throughs to avoid the congestion that is likely to occur at the Send crossroads and in Ripley.

Attached documents:

**Comment:** MM9 - LPMM18/2340  **Respondent:** Jane Whatley 8595905  **Agent:**

These objections are for the attention of the Planning Inspector in charge of the Local Planning Consultation, Guildford Borough Council.

I objected with many others to the size of the previous plans and it is extremely galling that thousands of objections no longer count and you have made adjustments that are proposing even bigger developments than those previously suggested.

**Objections to Modification MM9 and MM44**

I object in the strongest possible way to the plans of the Council to build in the Green Belt on any site, even when (subjectively) it is determined as being on 'within the confines' of a village. Who determines this?

It is a precedent that is extremely dangerous for everyone who loves the land we live in. This specially protected land is meant to give a better quality of life to those who live in the city. The protection of Green Belt land should be seen as sacrosanct and to build on this when there are no special circumstances removes the rights of our descendants.

The Land at Alderton's Farm is one which together with other planned developments for the area is likely to increase traffic and pollution with no real advantages for the village, only the profit of the developers. Roads in this area are narrow and twisting and the introduction of several hundred cars is not going to make life pleasant for those living nearby. It also raises the possibility of unsuitable, narrow roads without footpaths being used as cut-throughs to avoid the congestion that is likely to occur at the Send crossroads and in Ripley.

Attached documents:

**Comment:** MM2 - LPMM18/1623  **Respondent:** Peta Malthouse 8596673  **Agent:**

**Normandy Local Plan, Main Modification 45 dealing with Policy A64**

**PLUS**

Objection to the ONS number put forward as MM2 is out of date and I wish to call for the issue to be examined by the Inspector and the Inquiry to be re-opened

I write to OBJECT to the above proposed amendment to the plan on the following grounds

**General Introduction**

1. I note that for some reason the land is now being described as ‘Flexford’. It is not. The administrative area under the control of Normandy Parish Council consists of 6 hamlets washed over by the green belt. These are Flexford Christmas Pie Wyke Normandy, Willey Green and Pinewood The clear and enforceable boundary for Flexford lies alongside the railway line.

This land has been the subject of several applications refused for green belt status and the sensitivity of the area. It has always been described as ‘Land to the east of, Glaziers Lane, Normandy, GU3 2EB’ it cannot be
described as a ‘village extension’ or be justified as an extension of Normandy. It is not in the settlement area
(recent previous application 17/P/01413)

2. The land consists of green fields previously used for grazing and farmland. I believe it is designated Red
Farmland or Grade 3 which should not be used for development according to Government guidelines.

3. The land includes a lake. Close by to this lake is one other The Flax Pond where Great Crested Newts live. That
pond and surrounding land is an SNCI designated for the presence of a colony of Great Crested Newts and water
voles It is not unreasonable to record there is a high probability that the newts thrive in this lake also. They are
migratory. (see below **) Great Crested Newts are a species protected by EU Law

Travel constraints

4. Access to the site relies on an entrance off Glaziers Lane which at any point in my view would be dangerous.
Glaziers Lane, a D Road, is already a busy cut through for traffic wishing to pass from A 322/A323 and A31/A3.
There is no height restriction and as a result it takes most of the lorry traffic as opposed to Westwood Lane. The
bridge over the railway is hump backed and squint. Lorries move into the centre of the road in order to pass over
it and at speed.
The proposal to add a junction to the A31 slip road joining the A3 will further add to the problems as traffic is
backed up as stated above already from the junction between A31 to A3 and this will just add to the problem
(Policy MM37 Land for access road between A31 Farnham Road and Blackwell Farm, Hogs Back,
Guildford)

5. It is proposed to put 105 dwellings on this site. At minimum one could expect this to generate 210 further cars
fighting to either get on the A323 or the A31. Although it will be close to Wanborough Station, access to the
station is only achieved over the railway bridge to the south with a further bridge to be crossed once on the
platform. Safety for pedestrians is an issue which is why most either get dropped off at the station in cars or park
there. The car park is very small with only space for about 10 cars to park. There is no spare land either to
provide pedestrian access from the road or provide further parking for cars

6. Facilities for primary school, doctor’s surgery, and village hall are all situated 2KM away encouraging further
car use. There are no shops, pub or garage in the Parish except for Hunts Hill Farm in Normandy which sells its
own organic meat. Nearest shops are in Ash Wharf and Fairlands both 5KM distant

7. Even though the County Council have recently carried out high quality maintenance of the path from the
Normandy Crossroads to the station the pathway is only one sided over the bridge and requires pedestrians to
cross over at a point adjacent to this land. Again, pedestrian safety has always been an issue

8. There are infrequent bus services to or from Flexford which has only a skeleton service

9. The Wanborough train service involves half hourly service at peak times and hourly outside those times Until a
few years ago there was no service on a Sunday at all

10. Both the A323 and A31 which are the roads that lead in and out from Flexford are full. The A323 has been
assessed as such by SCC approximately 2 years ago. The A31 to Guildford is often at standstill from the A31/
B3000 junction which serves Flexford. The A323 is often backed up to the Normandy Xroads leading to
Guildford in the am. When an accident occurs on either road it is not unusual to be gridlocked on both
Westwood Lane and Glaziers Lane.
The heaviness of the traffic has increased more than usually expected after the Summer holidays along the A
roads and one has to assume that this is due to the new developments in Aldershot (3850 new homes in first
phase under construction) and at Deepcut (1450 new homes presently under construction) on Ex-Army Land. On
top of this the frequency of traffic down both Glaziers Lane and Westwood Lane again at speed is noticeable
since the end of school summer holidays as cars held up in jams on the A roads seek alternative routes. There
aren’t any.

General Infrastructure

11. There is one farm shop ‘no pub or petrol selling garage. Ownership of a car is pretty well essential. The
Christmaspie cycle trail is not one that can be easily used for work. It is mainly scenic and meanders through
Wood Street Worplesdon and Park Barn. The roads/pathways in very poor condition therefore it is not used for
that purpose and was not intended to be so
Flooding

12. An assessment has been commissioned by GBC of Flexford because of the habitual flooding and back flush experienced by those who live in the area. The ponds and lakes that feature along the length of the railway line at this point are key to the fact that the drainage of the land is assisted by a number of streamlets leading into the Hoe stream. The car park at Wanborough Station is often under water. Committees to address the general floodwater problems in the area have been chaired by our MP Jonathan Lord over the last 5 years during which time it has emerged that the soil pipe which serves properties along Glaziers Lane is only 4 inches in diameter. As far as I am aware Thames Water have no plans to increase the size of the soil pipe and other drainage facilities. At times overflows/flooding into ditches at Manor Fruit Farm have caused Environmental Pollution events to occur. This proposal would add to the outflow of sewerage. The land concerned does not presently flood to my knowledge during Spring/Summer months but any building on this land will interfere with natural drainage and pose further stress to an already barely adequate public sewer.

Wildlife Habitat

13. The site is situated approximately 2KM from areas designated SNCI at Wyke Church and Normandy Common and less than 2.2KM from the Thames Basin Heath and SSSI. It is also adjacent to the SNCI **incorporating the Flax Pond. This was designated SNCI because of the colony of Great Crested Newts which are a protected species under EU Law. The site is an extremely important area for habitat and in my view, it is disingenuous to suggest that by developing it one opens up the area for a green corridor... you are reducing it... and cutting down the migratory opportunities for wildlife in the area of Ancient Woodland situated directly opposite to the west of Glaziers Lane i.e. Pusseys Copse.

14. As stated above *. Traditionally this land has been used for grazing farm animals and is designated Grade 3 or Red farmland. Govt guidance states this should not be used for development. Industry forecasts show that the market value for such land as farmland will increase over the next five years because of the impact of Brexit.

Reasons to develop in the greenbelt

15. There appear to be no reasons given in this plan to explain the intention to depart from the Guidance given in the NPPF. This parcel of land was described in the original supporting documentation as H10 a necessary retention of greenbelt status to ‘prevent Normandy Wood Street and Flexford from merging’ That remains the case. Given the proposals to inset Normandy and thus extend the settlement area this proposal seeks to merge Normandy and Flexford. The proposal in it’s size represents a 7% increase in households in the Normandy Administrative area quite apart from the additional land made available for development. It also unacceptably extends the development area towards Wood Street thus destroying the openness of the greenbelt as a whole. The administrative area of Normandy forms the only realistic buffer between the town of Guildford which sprawls into Worpleston and Aldershot which overflows into Ash.

‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.’

NPPF

No such reasons are given despite the fact that the land in question satisfies each and every one of the 5 examples of the ‘five purposes’

16. In contrast land is being set aside in Ash as follows and many of the reasons given for this exceptional step apply to the land East of Glaziers Lane.

Attached documents:
The NPPF on this point states

‘The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example

when planning for larger scale development such as new settlements or major

urban extensions. Any proposals for new Green Belts should be set out in strategic

policies, which should:

1. a) demonstrate why normal planning and development management policies

would not be adequate;

1. b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary’;

I do not believe those requirements are satisfied

1. In summary although I do not object to policies MM38 and MM37 I say they are counterintuitive to your proposal MM45
2. Finally, I am extremely concerned that even though the Planning Inspector expressed views which mirrored points I have made in previous objections….ie that the additional land should be found in the town centre. no such proposals have been forthcoming.

Further as the High Street comes under ever increasing pressure that WILL result in closures of traditional shops there appears no desire to review space set aside for more retail space

The five year build plan

3. Since the plan was formulated a very real opportunity has presented itself to the Borough Council, i.e. the Govt proposals to allow Local authorities to borrow to build much needed social housing. Such opportunity allows the Borough the luxury of being able to actually deliver additional houses within the first 5 years of the Plan. I hope that those plans are being made now.

The number given at MM2 has not been amended despite new robust figures being supplied by the ONS. This plan is clearly out of date and the figures can no longer be used to justify such a huge intrusion into the greenbelt. On that basis there is more than enough scope to review the alternative of Town Centre provision. Section 2b is clearly out of date and MM3 therefore inadequate. It requires re-examination and, in my view, to fail to do so would be obtuse.

Attached documents:
I write to OBJECT to the above proposed amendment to the plan on the following grounds

**General Introduction**

1. I note that for some reason the land is now being described as ‘Flexford’. It is not. The administrative area under the control of Normandy Parish Council consists of 6 hamlets washed over by the green belt. These are Flexford, Christmas Pie Wyke Normandy, Willey Green and Pinewood. The clear and enforceable boundary for Flexford lies alongside the railway line. This land has been the subject of several applications refused for green belt status and the sensitivity of the area. It has always been described as ‘Land to the east of, Glaziers Lane, Normandy, GU3 2EB’ it cannot be described as a ‘village extension’ or be justified as an extension of Normandy. It is not in the settlement area (recent previous application 17/P/01413)

2. The land consists of green fields previously used for grazing and farmland. I believe it is designated Red Farmland or Grade 3 which should not be used for development according to Government guidelines.

3. The land includes a lake. Close by to this lake is one other The Flax Pond where Great Crested Newts live. That pond and surrounding land is an SNCI designated for the presence of a colony of Great Crested Newts and water voles. It is not unreasonable to record there is a high probability that the newts thrive in this lake also. They are migratory. (see below **) Great Crested Newts are a species protected by EU Law.

**Travel constraints**

4. Access to the site relies on an entrance off Glaziers Lane which at any point in my view would be dangerous. Glaziers Lane, a D Road, is already a busy cut through for traffic wishing to pass from A 322/A323 and A31/A3. There is no height restriction and as a result it takes most of the lorry traffic as opposed to Westwood Lane. The bridge over the railway is hump backed and squint. Lorries move into the centre of the road in order to pass over it and at speed.

   The proposal to add a junction to the A31 slip road joining the A3 will further add to the problems as traffic is backed up as stated above already from the junction between A31 to A3 and this will just add to the problem (Policy MM37 Land for access road between A31 Farnham Road and Blackwell Farm, Hogs Back, Guildford)

5. It is proposed to put 105 dwellings on this site. At minimum one could expect this to generate 210 further cars fighting to either get on the A323 or the A31. Although it will be close to Wanborough Station, access to the station is only achieved over the railway bridge to the south with a further bridge to be crossed once on the platform. Safety for pedestrians is an issue which is why most either get dropped off at the station in cars or park there. The car park is very small with only space for about 10 cars to park. There is no spare land either to provide pedestrian access from the road or provide further parking for cars.

6. Facilities for primary school, doctor’s surgery, and village hall are all situated 2KM away encouraging further car use. There are no shops, pub or garage in the Parish except for Hunts Hill Farm in Normandy which sells its own organic meat. Nearest shops are in Ash Wharf and Fairlands both 5KM distant.

7. Even though the County Council have recently carried out high quality maintenance of the path from the Normandy Crossroads to the station the pathway is only one sided over the bridge and requires pedestrians to cross over at a point adjacent to this land. Again, pedestrian safety has always been an issue.

8. There are infrequent bus services to or from Flexford which has only a skeleton service.

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‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. ‘
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No such reasons are given despite the fact that the land in question satisfies each and every one of the 5 examples of the ‘five purposes’

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Attached documents:

Comment: MM27 - LPMM18/3940  Respondent: Allen Fencing (Mr Paul Cope) 8598433  Agent:

MM27 / MM41 / MM42 / MM48 – Transport Strategy

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/marina in Tannery Lane), the main road through Send has struggled

Having temporary lights has become a regular feature, and continues even today (4-way lights at the A247 junction to Old Woking, and along Portsmouth Road into Ripley)

Send is a VILLAGE, not a town – and the main road through Send regular gets clogged with traffic, and backs up most mornings and evenings – in both directions

The Local Plan attempts to address the issue of transport, but is inaccurate in several places (eg ‘on most local roads in urban areas and in villages, there is at least one footway, usually two’)

Other than the main routes out of the village (which are already under pressure), most roads are in fact lanes, often with no footways at all (eg Polesden Lane, parts of Vicarage Lane & Potters Lane)

Many other routes are lanes which cannot accommodate free-moving two-way traffic (Newark Lane, Burnt Common Lane, Rose Lane, Send Hill, Woodhill, Potters Lane, Church Lane, Vicarage Lane)

The existing bends around Potters Lane / Send Hill are already treacherous, with several blind corners and narrow apertures – these need attention already, not more traffic volume!

Overall, the slightest developments can create significant traffic, pollution, delays and backlogs, putting more pressure on people using ‘back roads’ (ie lanes) and clogging up the villages

In summary, the modifications are simply too much for the village of Send and Burnt common, that already suffer from increased traffic and congestion / pollution

Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’

ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan
It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking

Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising. A loss of more countryside/Green Belt would exacerbate this

Abandoning the new A3 slip-road (policy A43a) would save money which could be better spent on other services for existing residents, who pay high levels of Council Tax

(such measures could include traffic-calming, road repairs and noise reduction)

Attached documents:

Comment: MM41 - LPMM18/3924  Respondent: Allen Fencing (Mr Paul Cope) 8598433  Agent:

**MM41 – Garlicks Arch (policy A43)**

The land itself is GREEN BELT, and there are no apparent ‘special conditions’ to exempt it. The land contains ancient woodland, which should be preserved. Many trees carry TPOs (preservation orders)

One key purpose of retaining GREEN BELT is to prevent urban sprawl, and development here would compromise this, essentially linking Ripley to Send/Burnt Common

The site itself has been subject to flooding in the past, and this should render the site unsuitable for development. The extra traffic generated would be unacceptable for existing infrastructure, which is already bursting at the seams

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further. Having closed the primary school in Ripley, there is no tangible capacity for schooling

It is already far too difficult to get appointments at the Send Villages Medical Centre, which seems to be already running at full capacity

We OBJECT to this development and the proposed modification

Attached documents:

Comment: MM41 - LPMM18/3943  Respondent: Allen Fencing (Mr Paul Cope) 8598433  Agent:

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The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough

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(such measures could include traffic-calming, road repairs and noise reduction)

Attached documents:

Comment: MM42 - LPMM18/3917  Respondent: Allen Fencing (Mr Paul Cope) 8598433  Agent:

MM42 – Burnt Common (policy A58)

I do not agree with the labelling of this site as being ‘strategically’ important It is GREEN BELT land, and I oppose the re-drawing of GREEN BELT lines simply to suit this proposal

There are no apparent ‘special circumstances’ to warrant insetting this site from the GREEN BELT Other sites in the borough have unused capacity, and other ‘brownfield sites’ should firstly be fully considered and identified
We have already witnessed increased commercial development (Send Business Centre, Vision Engineering) in the village. There is no apparent or proven demand for extra industrial land in the village.

The road infrastructure is unsuitable, as the road accessing the site is in disrepair (cracks regularly) and cannot cope with existing traffic, let alone more Vehicles leaving the site would have to cross onto the north-bound A3 slip road, which is fast-moving and has been the scene of many accidents in the recent past, some fatal.

The likely increase in traffic and noise would be inappropriate for a site bordering on residential areas on the roundabout.

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further.

The proposal to create a 4-way junction off the nearby A3 (policy A43a) is a waste of money and would only increase traffic noise and pollution through the villages.

WE object to this development and the proposed modification.

**Attached documents:**

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**Comment:** MM42 - LPMM18/3947  **Respondent:** Allen Fencing (Mr Paul Cope) 8598433  **Agent:**

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough.

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(such measures could include traffic-calming, road repairs and noise reduction)

Attached documents:

Comment: MM44 - LPMM18/3933  Respondent: Allen Fencing (Mr Paul Cope) 8598433  Agent:

MM44 – Aldertons Farm (policy A63)

This site proposes development for building around 120 homes, but it is GREEN BELT land No ‘special circumstances’ should apply, especially as the land has been subject to flooding and does not drain well

The likely increase in traffic would be inappropriate for a site bordering on residential areas

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further

The knock-on effect, in addition to other sites, would be excessive for our village, given the revised (ie lower) ONS forecasts for housing needs

WE OBJECT to this development and the proposed modification

Attached documents:

Comment: MM48 - LPMM18/3952  Respondent: Allen Fencing (Mr Paul Cope) 8598433  Agent:

MM27 / MM41 / MM42 / MM48 – Transport Strategy

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough

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Attached documents:

Comment: MM9 - LPMM18/3925  Respondent: Allen Fencing (Mr Paul Cope) 8598433  Agent:

**MM9 – Green Belt**

None of the proposed sites seem to carry any tangible ‘special circumstances’ to warrant insetting from the Green Belt.

The concern of many villagers is that – once a little development is permitted – it can establish a basic footprint for greater density of development in future.
There is prevalent use of the term sustainable development in the main modifications (e.g. MM1), to suggest this means development will be without cost to the environment or amenity of the area/s involved. However, it is meaningless without clear definition of what the term means, especially in terms of real protection from irreversible damage, and is clearly being used permit development in general. The idea of presumption in favour of development (MM1) is also skewing the plan toward development without proper control. MM24 goes some way to addressing these issues, but it like existing implementation of sustainability has been a tick-box exercise without real innovation and impact.

Comment: MM10 - LPMM18/5738  Respondent: Sarah Belton 8598561  Agent:

MM10 the wording ‘strongly resisted’ is insufficient. Real protection of the countryside (and greenbelt) only comes from the definite wording ‘not permitted’. The plan uses these rubbery statements time and again, always opening the way in favour of development and evidence of a strong bias towards development without proper control.

Comment: MM11 - LPMM18/5739  Respondent: Sarah Belton 8598561  Agent:

MM11 permits development of areas at medium to high risk of flooding. There should be no development permitted in these areas, especially when existing weather patterns and projections of climate change indicate rainfall is likely to be more intense, rather than the drizzle that has been the pattern of the past. Is the Borough willing to underwrite the insurance for such properties, when it is unlikely that residents will be able to obtain insurance otherwise?

Comment: MM19 - LPMM18/5740  Respondent: Sarah Belton 8598561  Agent:

MM19 The removal of these clauses shows that the influence of business outweighs what appears only to be lip service to improving the health and lifestyle of young people in the borough.
[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

<table>
<thead>
<tr>
<th>Comment: MM22 - LPMM18/5741</th>
<th>Respondent: Sarah Belton 8598561</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>MM22</strong> This addition conveniently future-proofs major new developments (which are subject to a high level of objection from local residents for reasons outlined in this and my previous letters), yet future-proofing protection of the greenbelt, countryside, villages and infrastructure is not built into the plan.</td>
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<td><strong>MM25</strong> Again weak wording – ‘will be considered’ opens the door for historic/heritage sites to be developed. It needs defined conditions where consideration may be possible.</td>
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<th>Respondent: Sarah Belton 8598561</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>MM22</strong> This addition conveniently future-proofs major new developments (which are subject to a high level of objection from local residents for reasons outlined in this and my previous letters), yet future-proofing protection of the greenbelt, countryside, villages and infrastructure is not built into the plan.</td>
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<tr>
<td><strong>MM25</strong> Again weak wording – ‘will be considered’ opens the door for historic/heritage sites to be developed. It needs defined conditions where consideration may be possible.</td>
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<tr>
<td>MM29 Drainage infrastructure across the borough and beyond is inadequate, poorly designed and antiquated. Before new developments are even considered, existing roads and drainage needs to be upgraded to 21st century standards. It is beyond belief that just a couple of hours of steady to heavy rain inevitably results in minor flooding due to poorly drained, uneven and pot-holed roads, poorly located and sized drains, or blocked drains due to lack of adequate maintenance or design. Britain is fast becoming a third world country due to years of neglect due to privatisation and profiteering.</td>
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<tr>
<td>MM3 wording includes the ‘efficient use of land’. Again, without clear definition of what this means, one could assume that this means more tower blocks like those being approved and built in Woking Town Centre. Vertical building is efficient, but history has shown that tower blocks have plenty of problems, both socially and physically.</td>
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<tr>
<td>MM40 Fails to address the fact that this site is greenbelt land and was meant to be returned to farm land after WWII. This development must not be permitted on these grounds. The Council continues to ignore this without justification, and valid protests from local residents.</td>
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<td>MM41 Fails to address the fact that this site is greenbelt land and contains ancient woodland. This development must not be permitted on these grounds. The Council continues to ignore this without justification, and valid protests from local residents. The persistent increase in housing numbers in each local plan proposal indicates the Council’s disdain for local residents and due democratic process.</td>
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<tr>
<td>MM42 As with MM41, the Council has persisted in ignoring local protest and again that this is greenbelt land. Evidence in the local area is that retail and office/light industrial space is in excess, with vacant premises and others being</td>
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converted into residential flats. This aside, greenbelt land cannot be developed without exceptional circumstances, of which there is no evidence presented in the plan.

**Attached documents:**

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**Comment:** MM44 - LPMM18/5749  **Respondent:** Sarah Belton 8598561  **Agent:**

**MM44** There is some justification for infill of this area as it is surrounded by housing that forms part of the village of Send, even though it is within the greenbelt area. However, the number of houses is excessive and without specific, clearly stated infrastructure requirements for a large development on land which is subject to regular minor flooding, it should not be permitted to go ahead as currently stated.

**Attached documents:**

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**Comment:** MM48 - LPMM18/5750  **Respondent:** Sarah Belton 8598561  **Agent:**

**MM48** £1 million developer funding for the A247 transport infrastructure clearly demonstrates what I have been stating about the lack of will to make developers pay. This is but a drop in the bucket for what this work will cost, while the developers will walk away with vast profits and the tax-payer will pay for years to come both financially and in disruption (on congested roads and while works take place). I am deeply offended by the assumption of government at all levels, that ordinary people are stupid. This is the only conclusion one can draw from their repeated actions in this and other matters.

**Attached documents:**

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**Comment:** MM50 - LPMM18/5751  **Respondent:** Sarah Belton 8598561  **Agent:**

**MM50** It seems very convenient that suddenly such a large area no longer qualifies as SNCI (or am I misunderstanding this map). It is irrelevant, as this is greenbelt land and as such cannot be developed as previously stated.

**Attached documents:**

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**Comment:** MM51 - LPMM18/5752  **Respondent:** Sarah Belton 8598561  **Agent:**

**MM51** Greenbelt is greenbelt and there is no justification to change the boundary to permit development.

**Attached documents:**

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**Comment: MM6 - LPMM18/5735  Respondent: Sarah Belton 8598561  Agent:**

MM6 refers to ‘affordable homes’ and again we need a clear definition of what this means. Reasonably it should mean quality homes from one to three bedrooms, with consideration for innovation in design to be energy efficient and space saving without compromising amenity and appearance. Cost savings should come from reduced profit not quality, and affordability must be in perpetuity to prevent future profiteering. It is about time government at all levels stopped profiteering from the property market, in favour of promoting business that produces sustainable, quality jobs and products.

**Attached documents:**

**Comment: MM9 - LPMM18/5736  Respondent: Sarah Belton 8598561  Agent:**

MM7 any reference to use of greenbelt land for development without there being an exceptional reason for doing so, and specific local consultation in each case, must not be permitted as it contravenes the law and intent of the creation of the greenbelt in the first place.

**Attached documents:**

**Comment: MM9 - LPMM18/5737  Respondent: Sarah Belton 8598561  Agent:**

MM9 refers to the provisions of the NPPF regarding the greenbelt, but it is clear that protection in the NPPF for the greenbelt is weak and ineffectual, and not in line with the intent with which it was created and originally protected in law.

MM9 refers to infilling in villages. It is hard to argue against sensible infilling, but the wording is loose enough that interpretation of boundaries or limited infilling will be open to abuse. Also, it is essential that wording includes the provision of infrastructure (drainage, water supply, roads, etc.) to provide for such infill, and the impact that this will also have on the village and greenbelt land in the vicinity. Infrastructure is overlooked time and again in the plan. MM26 does address the issue of infrastructure, but the requirement for developments to include infrastructure provision should be enshrined in planning law. It is good that the idea of a levy on the development (and hence the residents) has been removed, as it is the developer who should pay for this, not unsuspecting residents, after the fact.

**Attached documents:**

**Comment: Other comments - LPMM18/5732  Respondent: Sarah Belton 8598561  Agent:**

**Guildford Borough Council – Proposed Main Modifications to Local Plan**

Having reviewed the documents regarding the main modifications to the Local Plan, I continue to feel that the changes pay lip service at best to the concerns of the broad population, raised in the 2014, 2016 and 2017 consultations. It shows a clear agenda for development at any cost, and that there are vested interests at play within both the Council and Central Government.

The Local Plan is unnecessarily wordy and complicated to ensure that it is inaccessible to most ordinary people in terms of having the time and knowledge to be able to comment in the manner which the process requires. Consultation is
required but not truly about seeking broad public opinion. It is good to see that targets for reducing appeals have been removed, but it was appalling that such wording was ever included – more evidence of how the democratic process is now being undermined in the UK.

Attached documents:

Comment: Other comments - LPMM18/5753  Respondent: Sarah Belton 8598561  Agent:

In summary, many of the amendments are semantics, without addressing the extension of the earlier proposed developments, increased numbers of houses and sizing of business space, and expanded intrusion into protected green-belt land. Removing limitations to building in flood-zones 2 and 3 is disgraceful.

I continue to object to the local plan on these grounds and because the Borough has failed to provide sound evidence of need or exceptional circumstances for much of the development. The Council continues to fail in providing guaranteed and appropriate infrastructure improvement already needed without additional local development. It has also failed to address issues of building in flood prone areas, especially when flooding is becoming an increasing problem with changes in weather patterns as the climate changes.

The Council shows clear disdain for the opinion of local residents.

As it is evident that many Councils in England are struggling financially, it is highly unlikely that such overdevelopment will be properly overseen and that infrastructure and services will keep pace with the increased population and traffic. Only the developers will win.

I will be accused of not wanting development in ‘my own back yard’, but my concerns are more far reaching than my local area. I believe the south east of England is at capacity, and I want to see vision and innovation in development practice for the future good of Britain as a whole. Our elected representatives at all levels must conduct themselves with due diligence and integrity, for the long term future of all, including their own children, not for the short term profit of a few.

Attached documents:

Comment: MM2 - LPMM18/2871  Respondent: Richard Sinker 8599137  Agent:

Some general comments.

I am not convinced that sufficient effort has been directed into maximising the early use of brownfield sites for housing generally and particularly in the town centre. In this context it is noteworthy that many brownfield sites are owned by GBC.

The justification for housing development in the green belt is inadequate and not proven until all available brownfield sites are exploited.

I understand that there are again new projections of numbers for housing issued by the ONS. It would seem essential to consider the impact of these new numbers now.

Over the past couple of decades, there has been a substantial shortfall in infrastructure development, particularly in the town centre. Current plans do not seem to have recognised this adequately.
In conclusion, I find sufficient deficiencies in the current status of the Local Plan that it should be declared unsound.

Attached documents:

**Comment:** MM3 - LPMM18/2870  **Respondent:** Richard Sinker 8599137  **Agent:**

My wife and I have been resident in Guildford since 1996 and have had connections with the town since the mid 1970s. I therefore value the opportunity to make some observations on the Main Modifications and in particular to section MM3, the town centre, its development and regeneration.

Policy S3. I have read the new proposed version closely.

My overriding comment is that there is an expectation of a cohesive plan for the town centre to emerge but that this will, in large measure, be dependent on the private sector for which I read “developers.” I believe that no coherent plan can be realised from a situation in which private sector developers will produce a planning application for one or more buildings which are to include spatial/public realm proposals for adjoining parts of the town centre. How can a coherent overall town centre plan evolve when there are a number of uncoordinated peripheral plans being proposed by several developers? I sincerely believe, with respect, that such expectation is naive and unlikely to succeed.

My second main observation is that there are several requirements, for example as noted in paragraph 4.1.19, that are expected to be integrated into a successful overall plan that by definition will be growing piecemeal on the back of individual planning applications. How does the council propose to “play a key coordinating role aimed at achieving delivery of development and generation...” with several partners as noted in paragraph 4.1.20? Surely there has to be a well thought out overall plan established and agreed before the approval of individual planning applications.

In this context I have not been able to understand the apparent reluctance of GBC to adopt and support the concept of masterplanning which precisely fills the role of defining and agreeing an overall plan before committing to major investments. I was most impressed by the initial Guildford Town Centre masterplanning proposals made by Allies and Morrison at the behest of Guildford Vision Group. Their work clearly demonstrated the great value of thinking through a complex set of factors and constraints over an extended period of time to arrive at a coherent and cohesive long term plan. With the further masterplanning work done, I am convinced that the latest proposal made by Guildford Vision Group should be formally adopted as an agreed plan. Perhaps I should add that my comments here are based on my own industrial experience gained over many years.

Persisting with stated major areas of floor space for retail in the town centre is perverse given the by now well known major inroads of online buying and the recent extensive failures of retail companies.

Attached documents:

**Comment:** MM1 - LPMM18/1321  **Respondent:** Mr Richard D Jarvis 8599201  **Agent:**

Supported

Attached documents:
Comment: MM10 - LPMM18/1327  
**Respondent:** Mr Richard D Jarvis 8599201  
**Agent:**

Changes welcome.

**Attached documents:**

Comment: MM15 - LPMM18/1328  
**Respondent:** Mr Richard D Jarvis 8599201  
**Agent:**

Why has the town centre been removed as a strategic employment site? Not explained.

**Attached documents:**

Comment: MM17 - LPMM18/1329  
**Respondent:** Mr Richard D Jarvis 8599201  
**Agent:**

changes welcomed

**Attached documents:**

Comment: MM2 - LPMM18/1322  
**Respondent:** Mr Richard D Jarvis 8599201  
**Agent:**

para (1) should be amended. It is strongly contested that the housing 'need' figure of 630 dpa is justified. The analysis by Neil McDonald that shows that the latest ONS forecasts of population and households for Guildford justify a much lower need figure. The recent GL Hearn update is not a sound basis on which to proceed. The allowance for affordability is too large. The allowance for student accommodation is unnecessary. The provision for Woking's unmet need should be reconsidered in the light of the revised ONS forecasts for Woking and the relative Green Belt impacts on both Woking and Guildford (and Waverley).

Tables S2a and S2b should be revised to take account of the new evidence, and the use of Green Belt land reduced. Housing in the inner urban area should be increased.

para (3) should included a provision for one or more transit pitches, given the recent experience of Travellers using inappropriate locations, such as park and ride sites.

Monitoring indicators - travellers - add in transit pitch provision.

**Attached documents:**

Comment: MM26 - LPMM18/1330  
**Respondent:** Mr Richard D Jarvis 8599201  
**Agent:**

Re para (40) Omit 'If appropriate' please.
Please can the intention behind (5a) be explained? How does this impinge on a developer's obligation to provide the infrastructure necessary to support a development?

The final sentence of the reasoned justification should be amended to read 'a review of the Local Plan will be undertaken.'

The addition of this policy is very welcome. There should be a map of the town centre showing the sites included in the plan (Policies A1, A2, A3, A5, A6, A7, A8, A9, A10, A11, A12, and A60), so that it is clear how these relate to one another. The area affected, designated as the town centre, requires a Master Plan, for the same reason that the strategic sites are being required to be planned. The Town Centre Regeneration Strategy is not a sufficient basis for this Plan.

4.1.21 is supported. It should be linked to a higher target for housing in the town centre.

4.1.24 Second sentence, please change 'could' to 'should'.

The quantum of comparison retail floorspace should be reduced in the light of changes in trading patterns, and a new plan for the site prepared with more housing and the bus station included.

The Town Centre Regeneration Strategy is not a sufficient basis for this Plan.
The target for retail floor space should be reduced in the Plan now.

A requirement to ensure that there is a quality bus station that can serve the site should be included.

Attached documents:

**Comment:** MM35  LPMM18/1578  **Respondent:** Mr Richard D Jarvis 8599201  **Agent:**

The lack of clarity on the requirement for a four-way junction with the A3 and provision for a connector road is unsatisfactory, and contrasts with the detail required for Blackwell Farm in Policy 26a. Para (2) should be amended to specify a requirement.

para (25) is welcome.

Attached documents:

**Comment:** MM36  LPMM18/1598  **Respondent:** Mr Richard D Jarvis 8599201  **Agent:**

Access from the A31 is undesirable given the topography, AONB status and likely growth in traffic on the A31. The wording of para (1) suggests that this Down Place route will be the main access to the site, and should be amended.

Attached documents:

**Comment:** MM37  LPMM18/1599  **Respondent:** Mr Richard D Jarvis 8599201  **Agent:**

Para (2) should be amended to remove reference to using the existing Down Place.

Attached documents:

**Comment:** MM38  LPMM18/1600  **Respondent:** Mr Richard D Jarvis 8599201  **Agent:**

The change is welcome.

Attached documents:

**Comment:** MM41  LPMM18/1601  **Respondent:** Mr Richard D Jarvis 8599201  **Agent:**
The cumulative effect of the addition development proposed in and around Send on traffic conditions has not been assessed. Further analysis is needed to demonstrate that local roads will be able to cope, or what measures may be required.

Attached documents:

Comment: MM42 - LPMM18/1602  Respondent: Mr Richard D Jarvis 8599201  Agent:

As with Policy A43, more information on the combined effect of proposals on traffic is required.

Attached documents:

Comment: MM43 - LPMM18/1603  Respondent: Mr Richard D Jarvis 8599201  Agent:

Given the prospect of lower housing need, there is no need for this site to be added to the Plan, and it should remain green.

Attached documents:

Comment: MM44 - LPMM18/1604  Respondent: Mr Richard D Jarvis 8599201  Agent:

This site may not be needed given the lower forecasts for population and households. If it is pursued, then it would contribute to the growth in traffic in the Send area, and an assessment of the cumulative effect of the local growth planned is required, as commented on Policies A43 and A58.

Attached documents:

Comment: MM5 - LPMM18/1325  Respondent: Mr Richard D Jarvis 8599201  Agent:

Re para 4.2.23, xperience of the effect of visiting Travellers provides sufficient grounds for inclusion of one or more transit pitches. Better to face this now, rather than 'keep under review'.

Attached documents:

Comment: MM6 - LPMM18/1326  Respondent: Mr Richard D Jarvis 8599201  Agent:
Re 4(a) - surely the test is 'financially' viable rather than 'economically'. Economic can imply the inclusion of non-financial measures, which developers are unlikely to allow for.

Attached documents:

Comment: MM2 - LPMM18/3511  Respondent: Development Planning Consultants (Richard Cooke) 8599937
Agent:

5.0. Tangleay Place Farm (TPF): Land north of Keens Lane allocation (J22).

This land scores highly on the initial Plan sustainability appraisal and is within the PDA for the wider area in the GBCS of the Plan.

Within the sustainability criteria it scores the highest of any of the sites currently under consideration.

5.1 Site factors.

Before considering the Councils reasons for not including this land, it is necessary to correct a few errors in analysis:

• This is a separate site from Keen Lane. It is not in the same ownership and we will develop this ourselves.

• There is no lasting boundary between our land and J22 Keens Lane. This is a further error on the Councils analysis, which they persist in offering to support their reasoning. If there is any boundary at all, this will have to be removed to provide for the surface water outflow proposed.

• The land has a separate access from Tangleay Lane. We own the majority of the land to the east of Tangleay Lane and as such can effect any road widening if required. (Albeit that out highway consultant considers that only minor alterations to provide footpath links will be required.)

• The land has a public sewer crossing it and has a substantial balancing pond that will take the surface water both from our site and the Keens Lane site.

In all respects the land could be made available as market housing within the first 5-year period. We would carry out development as a local medium sized developer.

5.2 Council reasoning.

“the site sits within a larger land parcel (GBCS land parcel J3) that would need to be removed from the Green Belt in full, were the site to be allocated, in order to ensure a strong, defensible Green Belt boundary

Allocation of the site would involve developing only c.20% of the additional land that would need to be removed from the Green Belt, hence Green Belt release could not be justified, in the Council’s view”

5.3 Why is this relevant?

We are not asking for the whole of the landholding to be released.

We do not understand why the Council consider that the whole parcel should be released from the Green Belt.
The parcelling and land ownership should not be relevant; it is the characteristics of the land itself that should be considered.

There is a considerable and lasting boundary to the west (Tangley Lane) and to the north the farm buildings of TPF provide a sense of enclosure.

Additionally, we would provide a new boundary, which would be designed, planted, embanked (or whatever) to ensure that the boundary of the Green Belt accords with the SPA boundary. We would also covenant or otherwise place in Trust the remaining land between the northern boundary and the farm buildings to ensure that this land always remains within the Green Belt.

This could be dealt with under a S106 agreement.

There is no difference between us planting a new boundary and Ashill planting a new boundary to secure their site northern boundary for the future containment of J22. Furthermore the existence of the SPA boundary as a control over future development is well established in this Plan where the Wisley allocation has similar considerations.

By carrying out planting and strengthened by legal protection, the Green Belt boundary could remain a defensible boundary into the future.

5.4 Summary: site allocation.

The Plan ‘broad spatial strategy’ considers that the sequential approach must be followed. This has underlain the entire Plan process and the Examination. To depart from this methodology at this stage would be fundamentally unsound.

The Council consider that there is a need to be “flexible” (5.2.9) and that factors such as deliverability, and other GB and infrastructure constraints also need to be considered. This added flexibility is not justified save for the need to consider the deliverability of housing sites. The other considerations area ‘part and parcel’ of the sequential approach already in force.

As it appears to all parties that Tiers 1-7 will not provide the land required for the 550 houses required in the next 5 years, then the sequential approach directs us towards the Tier 8 sites.

Of the suggested sites, TPF should be heading the list.

It scores best on the original sustainability analysis, being on the edge of the urban area and close to many facilities. It can be developed completely on its own and the type and style of housing proposed would be unlikely to compete unfavourably with the standard speculative housing proposed by any developer that Ashill might sell their land on to.

The entire site could be developed within the next 5 years.

5.5 Recommendation.

TPF should be allocated for housing, to include provision of a new GB boundary with the SPA

Proposal: 60 houses

Attached documents:

Comment: MM3 - LPMM18/3508 Respondent: Development Planning Consultants (Richard Cooke) 8599937 Agent:
1.0 **Preamble.**

S.C. Properties is a property company specialising for the most part in housing. We are active in the Guildford and Godalming area and in the last 10 years have been responsible for the development of over 150 housing units in the Guildford market area. We are currently building in the Town Centre and have recently been given the Civic Trust award for the best new housing scheme in Waverley.

Our Managing Director is also the senior partner in the planning consultancy Development Planning Consultants.

We are ‘planners who develop’.

Our fellow Directors and partners have over 40 years experience of all aspects of the speculative and social housing markets.

The reason for this preamble is to establish our credentials as a firm involved in local area development for over 20 years, with a strong town planning emphasis.

2.0 **Our involvement.**

We currently own land at Tangley Place Farm (TPF), ‘Land to the north of Keens Lane’ which has been considered and then dismissed as a site for further allocation.

3.0 **Background to the Plan**

Following the examination into the Local Plan, the Inspector considered that provision should be made for a further 550 houses capable of delivery in the first five years of the Plan.

Whilst the main modifications (MM’s) have been inserted into the Plan, these representations follow the Sustainability Appraisal Report ‘Addendum’ of September 2018, which considers the new allocations under the ‘additional housing scenarios’.

3.1 **Basic principles of the Plan.**

The Inspector raised no objection to the broad spatial strategy proposed in the Plan. The strategy proposed a hierarchy of settlements ranging from Tier 1 (Guildford town centre) to Tier 10 (Green Belt villages).

The proposed MM’s suggest that this methodology should continue to be adopted by the plan makers, subject to being “flexible” to take account of timescale delivery issues, constraints, infrastructure and GB sensitivity.

Additionally, the Council must keep a 5 year supply of land, with supply not being subject to overreliance on one site, and not reliant on infrastructure outside the LA control.

Having established these parameters the MM’s rapidly proceed to allocate most of the new land coming forward to sites within Tier 10, the lowest Tier in the hierarchy.

4.0 **Objections.**

4.1 Tier 1 sites.

The SA considers no further housing sites will come forward in the initial 5-year period. Whilst it is appreciated that this was discussed at the Inquiry, I find it incomprehensible that there will be no further housing (outside that already identified in the Plan) coming forward within Guildford.
Land will come forward on old industrial/commercial premises in the Town Centre especially in the station area and along Walnut Tree Close. Whilst we understand the Council would prefer this area to remain commercial, the existence of PD rights to convert business space and the approval for various redevelopment schemes has already rendered this land as likely to go for residential and student development.

Additionally much of the development within town centres is by its nature small scale. Only when taken together do the numbers start to have an effect.

Whilst I understand that the delivery of these sites may be a matter of conjecture, a policy positively affirming the residential nature of the wider town centre would encourage the redevelopment of land for housing.

Our company is currently building within 200 yards of Guildford castle and our prior marketing suggests that there is a considerable demand for housing close to the town facilities.

Our assessment is that at least 150 units would come forward within the next 5 years, with policy encouragement from the Council.

4.2. Tiers 2 to 6.

The Council consider that no further units will come from these sources; we have no evidence to contradict that view.

7.0 Summary

Tier 1: Guildford Town Centre.

More encouragement for redevelopment and reuse of industrial, commercial and retail space.

Allocate further 150 dwellings.

Tier 8: Guildford and Godalming Urban areas.

Tangley Place Farm: 80 dwellings

Aarons Hill: 200 dwellings

Tier 10: Green Belt villages

Smaller sites only. 50-70 max on small sites.

see attachment for appendix

Attached documents:  Richard Cooke Rep.pdf (894 KB)

4.3. Tier 7: CBGB sites around Ash and Tongham.

As developers active in the area, we are aware that considerable housing has already been allocated here and that this, together with the proximity of
Rushmoor and Aldershot, in particular, confirms to me as a developer that this area cannot take any more housing than is already allocated.

**Attached documents:**

---

**Comment:** MM39 - LPMM18/3513  **Respondent:** Development Planning Consultants (Richard Cooke) 8599937  **Agent:**

6.0 Comment on other sites proposed.

6.1 Tier 8:

Aarons Hill is part of a large site, which will benefit the Godalming housing market and not Guildford. The land is a clear incursion into very visible Green Belt and countryside. From a political perspective, this site has attraction to Guildford Members because no one in Guildford considers it part of Guildford.

Clandon Golf: this land lies within the AGLV and is a very visible part of the GB. Liddington Hall Farm: this land is relatively self-contained. It is agreed that all 300 units here would overload the local market.

6.2 Tier 10:

In our view there should be no large land allocations in any of the tier 10 sites.

These are all smaller settlements, which do not satisfy the sustainability criteria established within the Plan methodology. The allocations of such large individual sites will overwhelm the villages. If any land should be needed here the site size should be restricted to a size suitable for local developers to build, in the region of 20 units maximum. It would seem that Send Parish area is suffering considerably in these revised allocations, having a large allocation already agreed in its midst (Garlicks Arch). Other villages are not of the size to justify considerable expansion of their boundaries.

6.3 Conclusion.

The broad spatial principles are agreed for the Plan. The MM’s pay limited lip service to these principles. There is little reflection of the ability of Guildford urban area to assimilate more growth from outworn industrial and retail land. Within the recommended Tier 8 sites there is no justification why TPF should have been overlooked.

The allocation of large sites within Tier 10 will impact seriously on deliverability and wider planning and infrastructure constraints.

**Attached documents:**

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**Comment:** MM9 - LPMM18/3510  **Respondent:** Development Planning Consultants (Richard Cooke) 8599937  **Agent:**

4.4. Tier 8.

This is the Green Belt land around Guildford and Godalming.

In our view, there are some fundamental inconsistencies in the sites proposed that render the Plan unsound.
The SA considers a number of sites within this category and in our view a reappraisal of the reasoning behind these recommended sites is necessary.

Attached documents:

**Comment:** MM2 - LPMM18/2944  **Respondent:** Roger Newland 8600929  **Agent:**

For the attention of the Head of Planning Policy at Guildford Borough Council,

Further to my previous comments below I would wish to add my further objection in the strongest possible terms to the proposed amendments to the plan particularly as it relates to Send, Ripley and Ockham.

Firstly I would ask that the Council reconsidered its whole strategy re the use of the green belt and better utilise the centre of Guildford where the Councils failed policies re the North Street sites and have created a large waste land with a feeling of dereliction which would be ideal for a dense housing led redevelopment scheme rather than retail, which is struggling nationally.

There remains no special circumstances to take large swaths of land along the A3 for development which is contrary to planning policy to safeguard the Green Belt. Guildford's infrastructure particularly the road network is already at breaking point and cannot absorb further developments.

Attached documents:

**Comment:** MM2 - LPMM18/2946  **Respondent:** Roger Newland 8600929  **Agent:**

Re Policy S 2 - I would also ask that the Council revisits the entire plan to reflect the latest ONS housing figures and remove all of the excess housing from the Green Belt.

With regard to Send, Ripley and Ockham I believe they are being treated unfavorably, perhaps with local political motivation, and as a consequence the Councils proposals lead to the start of ribbon development along the A3 from London, bounded by the M25, through to the other side of Guildford i.e. Wisley, Garlicks Arch, Burnt Common, Gosden Hill Farm and the University and Hogs back sites.

Attached documents:

**Comment:** MM3 - LPMM18/2945  **Respondent:** Roger Newland 8600929  **Agent:**

For the attention of the Head of Planning Policy at Guildford Borough Council,

Further to my previous comments below I would wish to add my further objection in the strongest possible terms to the proposed amendments to the plan particularly as it relates to Send, Ripley and Ockham.

Firstly I would ask that the Council reconsidered its whole strategy re the use of the green belt and better utilise the centre of Guildford where the Councils failed policies re the North Street sites and have created a large waste land with a feeling
of dereliction which would be ideal for a dense housing led redevelopment scheme rather than retail, which is struggling nationally.

There remains no special circumstances to take large swaths of land along the A3 for development which is contrary to planning policy to safeguard the Green Belt. Guildford's infrastructure particularly the road network is already at breaking point and cannot absorb further developments.

Attached documents:

Comment: MM41 - LPMM18/2947  Respondent: Roger Newland 8600929  Agent:

With regard to the impact on Send and Ripley I would comment as follows:

MM41 and MM44 housing on Garlick's Arch and Aldertons, Send.

The combined development at Garlic's Arch and Aldertons is disproportionate and will have the effect of nearly doubling the population of the village of Send Marsh with little or no improvements to the infrastructure, notably schools and health facilities. The proposal to add 670 homes (the total of both sites) all within the Green Belt in a five year period will change the nature of Send Marsh as a semi rural village. The impact on Send as a whole and Ripley with regard traffic will be horrendous particularly if the A3 slip roads North are provided.

It is appreciated that the borough needs smaller affordable properties but the Garlics Arch proposal is environmentally unsuitable for dense development being close to the A3 with attendant noise and air pollution and it will not lead to a sustainable environment for the new residents.

Attached documents:

Comment: MM42 - LPMM18/2949  Respondent: Roger Newland 8600929  Agent:

MM42 - Land at Burnt Common London Road

This development adds to the strip development along the A3 which I believe will in time eventually lead to the break down of the Green Belt. Access for HGV's to the A3 is a major issue. It is not proven why a industrial development has to be provided in the Green Belt or whether there is demand for such a development given the large underdeveloped facilities held by GBC in the Slyfield and West Guildford areas. There is no special circumstances to develop this green belt site and therefore the proposal conflicts with Government and Council planning policy.

Attached documents:

Comment: MM44 - LPMM18/2948  Respondent: Roger Newland 8600929  Agent:

With regard to the impact on Send and Ripley I would comment as follows:

MM41 and MM44 housing on Garlick's Arch and Aldertons, Send.
The combined development at Garlic's Arch and Aldertons is disproportionate and will have the effect of nearly doubling the population of the village of Send Marsh with little or no improvements to the infrastructure, notably schools and health facilities. The proposal to add 670 homes (the total of both sites) all within the Green Belt in a five year period will change the nature of Send Marsh as a semi rural village. The impact on Send as a whole and Ripley with regard traffic will be horrendous particularly if the A3 slip roads North are provided.

It is appreciated that the borough needs smaller affordable properties but the Garlcs Arch proposal is environmentally unsuitable for dense development being close to the A3 with attendant noise and air pollution and it will not lead to a sustainable environment for the new residents.

Attached documents:

Comment: MM9 - LPMM18/2950  Respondent: Roger Newland 8600929  Agent:

MM9 Green Belt policy.

This policy is vague and open to abuse by both developers and the Council. The Council has reviewed all boundaries and proposes insetting villages to remove their Green Belt status which I have opposed. In the case of Send Parish made up of three settlements Send, Send Marsh and Burnt Common there are potentially many areas that could be disputed. Preferably this policy should be removed but any event there should not be any subjective element left to interpretation.

This is the third or fourth time we have been asked to comment on GBC's efforts to put a local plan together and it appears that the Council is following Government dictate rather than the comments of so many residents. I still hope that common sense will prevail and that the housing figures will be reduced and that the Boroughs Green Belt is saved from the politically growth policy that will be detrimental to our borough we know and love.

Attached documents:

Comment: MM2 - LPMM18/6037  Respondent: Downsedge Residents' Association (Rosemary Morgan) 8601537  Agent:

• Reduction in ONS Population Forecasts for Guildford

Since the Inspector’s Examination significantly revised population forecasts (downwards) for Guildford have been released from the ONS, which mean that the total number of new homes required over the period of the Plan (2015-2034) should be considerably reduced. GRA expert Neil MacDonald has already demonstrated that 360 new homes per year would support the ambitious economic growth proposed by the Inspector. Therefore “exceptional circumstances” to allow the building of new homes in the Green Belt, are clearly not present. If this lower figure was accepted and more homes were built on brownfield sites, then the need to build on Green Belt land would be removed (Policy S2)

Attached documents:

Comment: MM26 - LPMM18/6038  Respondent: Downsedge Residents' Association (Rosemary Morgan) 8601537  Agent:
• Lack of Adequate Transport Infrastructure to support three large Strategic Sites

The three large Strategic development sites (Blackwell Farm, Gosden Hill and Wisley airfield) would all result in additional traffic using the A3, which is already at breaking point (e.g. the A3 regularly jams and results in substantial traffic flows through the town centre and residential urban area – the M25 / A3 improvements will only make matters worse). Such large-scale development sites should therefore not be included in the Local Plan until a substantial capacity increase to the existing transport infrastructure, notably the A3 through Guildford, is agreed. (Policy ID1)

We therefore ask that the Local Plan Examination be re-opened, in order to consider the consequences of the revised population forecasts, ensuring that Guildford has a “proper” town centre Masterplan and is provided with the improvements in transport infrastructure that it deserves.

On behalf of the members of Downsedge R.A., I therefore urge you to allow the Local Plan Examination to be re-opened.

Attached documents:

Comment: MM3 - LPMM18/6036  Respondent: Downsedge Residents' Association (Rosemary Morgan) 8601537  
Agent:

Downsedge Residents’ Association: Response to Guildford Borough Council - Local Plan changes, 2018

Background

Downsedge Residents Association was formed over 10 years ago to represent the views of Guildford residents in the area in the east of Guildford, bounded by the Epsom Road, Warren Road, St Omer and Tangier Road, including Gateways and Broadwater Rise, as well as The Ridgeway. Little Warren Close and Downside Road joined the Association more recently.

The area covered by our Association forms part of the easterly urban fringe of Guildford. We currently have around 80 household members, are members of GRA (the Guildford Residents Association) and support their responses to the changes being proposed to the current Local Plan.

The current Local Plan is unsound

We do not believe that the Local Plan as it currently stands, forms a “sound Local Plan”, for the following reasons:

• Lack of an Adequate Town-Centre Masterplan
The Local Plan lacks a properly thought out Town Centre Masterplan. (MM3– Policy S3). If there was one, then this would have identified more Brownfield sites for town centre housing, thus reducing the need for Green Belt development;

Attached documents:

Comment: MM39 - LPMM18/3499  Respondent: Shackleford Parish Council (Kate Lingard) 8603841  
Agent:

Consultation on the Submission Guildford Local Plan 2017 (the Local Plan)

Modification 39, Policy 61 – Land at Aaron’s Hill (Policy 61)
Shackleford Parish Council (SPC) objects to the inclusion in the Local Plan of Policy 61, which allocates Land at Aaron’s Hill for the development of around 200 homes.

The site at Aaron’s Hill lies in Eashing and is currently protected with Green Belt and AGLV status and SPC and Guildford Borough Council both agree that the site is manifestly unsuitable for such a large-scale development; and this is before the development of 262 dwellings on the adjoining half of the field within Waverley Borough is even taken into consideration. Development in the Green Belt is permitted only in ‘exceptional circumstances’ and the Inspector’s inclusion of Policy 61 to help satisfy the unmet housing need of Woking and the now substantially reduced housing needs figures of Guildford Borough is not an ‘exceptional circumstance’. Shackleford Parish includes Eashing within its boundary, and Eashing traffic issues have dominated meetings for the last ten years due to the already insupportable and dangerous volume of traffic and issues with speeding and congestion. The planned development of 262 (and then 200) homes is simply too dense for the site at Aaron’s Hill, and the already struggling roads into Godalming and the small village of Eashing (with its ancient wooden single-track bridge) will not be able to support it. The inclusion of Policy 61 is not, therefore, consistent with the National Planning Policy Framework.

In addition to objecting to the inclusion of the site at Aaron’s Hill on planning grounds, SPC also objects on the basis that the reasoning behind its inclusion is unsound. The main modifications have been made to address issues of legal compliance and to make the Local Plan sound. SPC understands that the Local Plan must meet the area’s objective needs and is informed by agreements with other local authorities. However, the inclusion of Policy 61 seeks to force Guildford Borough Council to accept development of rural land, that lacks necessary infrastructure, within the Green Belt, against advice from its own councillors and officers, purely on the plainly unsound basis of: (i) overinflated housing figures; and (ii) unmet housing needs from a different borough.

Waverley Borough Council has earmarked the other half of the Aaron’s Hill site for the development of 262 homes because it has been influenced by the need to provide for the massive and unrealistic housing requirement demanded by the new Waverley Local Plan (such housing need figures are currently the subject of a challenge in the High Court). During the consultation period for the modification to the Guildford Local Plan, the Office for National Statistics has released dramatically reduced housing needs figures for Waverley and Guildford Boroughs. Guildford’s housing need is now far below its own housing target. As the Guildford Local Plan has yet to be adopted, Guildford Borough Council still has the chance to benefit from these new figures and bring the housing requirement down to manageable levels. For the Local Plan to be sound, the inclusion of Policy 61 must be justifiable and based on proportionate evidence. SPC submits that now the population and housing needs figures have been revised, it would be unsound, unjustifiable and disproportionate for the Planning Inspector to ignore this revision.

Therefore, SPC urges the Inspector to strike out Policy 61, and remove any other sites that have been crowbarred into the Local Plan at this late stage to satisfy a housing need which has now been reduced massively. Doing so will provide Guildford Borough with a more carefully considered, appropriate, realistic, balanced and sustainable housing allocation for the future.

Attached documents:

Comment: MM2 - LPMM18/3807  Respondent: Stewart Morgan 8604545  Agent:

Recent ONS revisions to housing need have not been considered in this plan and clearly need to be.

Taking both new ONS figures and unrealised potential brownfield opportunities within the town centre into account, the claim that ‘exceptional circumstances’ exist to enable consideration of significant development in the green belt is clearly completely unjustified.

This plan therefore needs substantial revision if it is to be regarded as a credible and achievable path to a desirable future. It should be a matter of shame to those guiding this work that these and other related deficiencies have been clearly indicated to the council for more than ten years, seemingly with no serious response in all that time. The town is the heart
and engine of the borough. Until a thorough, vibrant vision and masterplan for the town centre is articulated and adopted, all this work on the local plan will inevitably fall short of what is required.

Attached documents:

**Comment: MM3 - LPMM18/3806  Respondent: Stewart Morgan 8604545  Agent:**

My response to your latest local plan consultation request is as follows:

Considering the huge amount of time and energy that has gone into the preparation of the current draft local plan, it is with regret that I nonetheless consider the result to remain inadequate to its purpose and therefore unsound.

The plan should be a reflection of an underlying strategy that credibly leads to a better borough for all in future. This is transparently not the case. Indeed any overall co-ordinated strategic vision for the borough is difficult to discern and may be absent altogether.

In particular, the lack of a co-ordinated, strategic approach to the town centre leads to the prospect of significant deterioration of traffic, accessibility and amenity and therefore a serious threat to the town's commercial vitality in the longer term. Relatedly, the plan is exposed to even greater infrastructure shortfalls if A3 improvements are not forthcoming, and the plan offers no mitigating 'plan B' for such a contingency. At the same time, a huge opportunity is being missed to capitalise on current and anticipated brownfield sites within the town, many already within the councils remit, which could be used to significantly reduce pressure on greenbelt land for housing. Taking these aspects into account, the town centre policy, S3, is wholly inadequate.

Attached documents:

**Comment: MM27 - LPMM18/2142  Respondent: Susan Greenman 8606081  Agent:**

MM27, MM41, MM42 and MM48 - Transport Strategy

The traffic implications on Send from the proposed plans for Garlick's Arch, Burnt Common, Clockbarn and Aldertons added to nearby Gosden Hill and Wisley/Ockham are not being taken into account re the changes to the A3 and Clandon slip roads.

The impact from these developments on Send Barns Lane and Send Road will be huge. The roads in Send are already totally congested particularly during rush hour in the morning and evening. Send Road is now one of the main roads from Woking to the M25. Also from Guildford to Woking.

The increase in traffic will cause more chaos, noise, nitrogen dioxide pollution, gridlock and hazards.

Potters Lane, Send has now become a "Rat Run" in the morning and evening. Traffic starts at 5am and when there are problems on the northbound A3 (which is frequently) the traffic diverts down Potters Lane. This lane is in its name a "LANE" not a major road. It is narrow and has many bends some of which are blind and very dangerous. I have encountered huge lorries and it is only a question of time before there is a major accident and fatality. The Police I believe want this Lane shut off from the A3 due to the many accidents when drivers think it is the Ripley exit slip road. In fact there is now traffic using Potters Lane constantly all day long and throughout the night - often by taxi drivers.

I have written many times to the appropriate Councils and authorities on this specific problem - to no avail. We just have to wait for the accidents.
The increase in noise and pollution for the local residents in the Lane, is now a serious problem.

Attached documents:

**Comment: MM41 - LPMM18/2138  Respondent: Susan Greenman 8606081  Agent:**

Ref: Local Plan for Send, Surrey

I am writing once again to strongly object to the Local Plan for Send. I refer below specifically to:-

MM41 - Land at Garlicks Arch, Send Marsh, Policy A43

I object to the proposed increase from 400 to 550 homes at this site. This is an increase of 37% which is excessive. 400 homes are too many and over 7,000 objections have been ignored by your council.

This is Green Belt land which contains ancient woodland. This proposed project will ultimately join the now separate villages of Ripley and Send meaning over development.

This site is subject to frequent flooding and contamination.

The potential of another 800 cars on already congested roads is unacceptable.

The current medical and school facilities could not cope with this increase of population.

Attached documents:

**Comment: MM41 - LPMM18/2143  Respondent: Susan Greenman 8606081  Agent:**

MM27, MM41, MM42 and MM48 - Transport Strategy

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I have written many times to the appropriate Councils and authorities on this specific problem - to no avail. We just have to wait for the accidents.
The increase in noise and pollution for the local residents in the Lane, is now a serious problem.

Attached documents:

**Comment: MM42 - LPMM18/2139  Respondent: Susan Greenman 8606081    Agent:**

**MM42 - Land at Burnt Common, London Road, Send, Policy A58**

I object again to the proposed increase from 7,000 to 14,800 sq.m of industrial and storage facilities.

This proposal was deleted from the 2014 plan and has since been increased twice which doubles this area. It will be the largest new industrial site of any village in the borough.

Why put a new industrial site in Send when the current Slyfield Industrial Estate has unused capacity. There are no special circumstances so it also contradicts MM9.

The Employment Land Needs Assessment showed a reduction in demand for industrial land. Send Business Centre is being increased by 25% which is enough industrial land for Send.

The narrow roads in the area will be unable to cope with the increase in traffic from this proposal and the pollution associated with the extra traffic.

Attached documents:

**Comment: MM42 - LPMM18/2144  Respondent: Susan Greenman 8606081    Agent:**

**MM27, MM41, MM42 and MM48 - Transport Strategy**

The traffic implications on Send from the proposed plans for Garlick’s Arch, Burnt Common, Clockbarn and Aldertons added to nearby Gosden Hill and Wisley/Ockham are not being taken into account re the changes to the A3 and Clandon slip roads.

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I have written many times to the appropriate Councils and authorities on this specific problem - to no avail. We just have to wait for the accidents.

The increase in noise and pollution for the local residents in the Lane, is now a serious problem.
MM44 - Land at Alderton's Farm, Send Marsh Road Policy A63

Once more I object to the plans for another 120 homes on this site.

This is Green Belt land with no special circumstances so it also contradicts Policy MM9.

Send Marsh Green is an area with traditional and heritage buildings and new homes will not enhance the environment. The rural location will be lost.

More cars on the surrounding roads and particularly the crossroads at Send will cause more congestion and gridlock - especially at rush hours.

With Garlick's Arch (550), Clockbarn (60), Winds Ridge (40) this development will add 770 more houses to the 1770 currently in Send an increase of 45%. This is totally unacceptable. It is almost doubling the size of Send, once a rural area and now being slowly urbanized and ruined.

Attached documents:

Comment: MM48 - LPMM18/2145  Respondent: Susan Greenman 8606081  Agent:

MM27, MM41, MM42 and MM48 - Transport Strategy

The traffic implications on Send from the proposed plans for Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not being taken into account re the changes to the A3 and Clandon slip roads.

The impact from these developments on Send Barns Lane and Send Road will be huge. The roads in Send are already totally congested particularly during rush hour in the morning and evening. Send Road is now one of the main roads from Woking to the M25. Also from Guildford to Woking.

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I have written many times to the appropriate Councils and authorities on this specific problem - to no avail. We just have to wait for the accidents.

The increase in noise and pollution for the local residents in the Lane, is now a serious problem.

Attached documents:
Comment: MM9 - LPMM18/2141  Respondent: Susan Greenman 8606081  Agent:

MM9 - Green Belt Policy

The modifications to the Local Plan claim to protect the Green Belt. Far from it! Guildford Borough Council claim they make exceptions for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village". This is open to interpretation at will by the Council leaving Residents at the mercy of developers.

Attached documents:

Comment: Other comments - LPMM18/2146  Respondent: Susan Greenman 8606081  Agent:

Other Developments

This consultation only allows comment on main modifications - this excluding the chance to object yet again to 40 houses and a "travellers site" on Send Hill. Also 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite it being the Wey Conservation Area.

The very title "Travellers" site is contradictory. Why do "Travellers" need a permanent site. The nature of their life style means travel not statutory. If they want to be Travellers - then travel. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it].

To subject Send to all this development of housing and industrial sites in such a small village is totally unacceptable. This should be spread over Surrey and its 40 other villages.

The residents of Send have been voicing their feelings and justified objections to this amount of development for years to Guildford Borough Council.

The Council seem to now completely ignore the Residents. What happened to Democracy!!

As a Conservative Voter my entire life and Guildford Borough Council being a majority Conservative run Council - I will think long and hard at the next local and national Elections.

I have written to Sir Paul Beresford in the past on this subject and Potters Lane in particular - sadly no response.

Why vote for a Party who ignore their Electorate on local and national issues.

Believe me if Brexit does not go ahead as the voters wish - not a fudge by Mrs. May and her Government and the Conservative Party - it will be a sad day for Democracy and I shall not vote again.

Guildford Borough Council with their proposed actions re this Local Plan are also ignoring their Electorate and Democracy!

Attached documents:

Comment: MM2 - LPMM18/269  Respondent: Susan Hibbert 8606113  Agent:
I wish to make the following comments on two aspects of the proposed changes to the Local Plan:

MM2

The final Local Plan must take into account the revised ONS population profile which reduces the housing need for Guildford. The number of dwellings required should be revised downwards to 460 per annum. This figure is made up of 400 per annum - as has now been agreed by G L Hearn - plus 60 per annum to take account of the ambitious growth forecast by the Inspector.

All possible constraints should be applied to prevent building on the Green Belt, particularly bordering an AONB.

Attached documents:

Comment: MM2 - LPMM18/5516  Respondent: Susan Hibbert 8606113  Agent:

MM2: I have already stated in a previous email that I believe it is ridiculous to continue to base Guildford’s housing need on outdated figures. Experts now agree that the previous OAN is approximately twice as high as it needs to be.

Guildford’s infrastructure already creaks under the strain of existing development and its roads are clogged. Appropriate new infrastructure must precede development and development must be only proportional to genuine housing need.

Attached documents:

Comment: MM23 - LPMM18/270  Respondent: Susan Hibbert 8606113  Agent:

MM23

The exemption for strategic sites from the need to respond to distinctive local character is potentially worrying. Guildford’s particular character as an historic market town must be preserved.

Attached documents:

Comment: MM23 - LPMM18/5518  Respondent: Susan Hibbert 8606113  Agent:

MM23: A height policy should be introduced. Developers are seeking (and in the notorious Solum case already have) permission to build inappropriately tall tower blocks in the town centre which are not in keeping with Guildford’s character as a historic market town surrounded by AONB. Guildford unfortunately already has two blocks (aptly described by one previous planning officer as ‘Guildford’s sixties moment’) which blight certain views across the Wey from the town centre, and it cannot afford to repeat this mistake.

MM23 (in 9): Strategic sites should NOT be exempt from the requirement to reflect locally distinct character ... not in a unique historic gap town like Guildford. Reinforcing our town’s sense of place is vital.
In the light of these concerns and of the Inspector’s comments, I believe that - notwithstanding the dangers of delaying the Local Plan - it would be reasonable to ask the Inspector to re-open the Inquiry. This is a long term plan which will decide Guildford’s future and thus it is vital to get it right.

**Attached documents:**

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**Comment:** MM3 - LPMM18/5517  **Respondent:** Susan Hibbert 8606113  **Agent:**

MM3 (in 5): There should be a policy in place to prevent inappropriate garden-grabbing in the residential suburbs around the town centre.

**Attached documents:**

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**Comment:** MM13 - LPMM18/2668  **Respondent:** CPRE Surrey Branch & Guildford District (Tim Harrold) 8607169  **Agent:**

MM13
+ There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g., online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing.

**Attached documents:**

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**Comment:** MM2 - LPMM18/2656  **Respondent:** CPRE Surrey Branch & Guildford District (Tim Harrold) 8607169  **Agent:**

3. WOKING HOUSING
CPRE objects to the proposed additional allocation of extra housing to Guildford from Woking which will have a damaging impact on the county town’s countryside. It is our view that a decision of this kind should not have been made at this juncture before Woking’s proposed plan is known.

FORMER WISLEY AIRFIELD, OCKHAM : POLICY A35

GENERAL OBJECTION

MM2
+ The housing target is wrong. CPRE is requesting the Inspector to reopen the hearing so that the latest ONS figures and household projections can be taken into account.

+ There should be no requirement for Guildford to take Woking’s unmet need, particularly as this will require further Green Belt release.

+ Guildford Borough Council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield sites before moving to land in the villages or Green Belt. The
addition of another 500 houses in Send (which will be car dependent) has a severe impact on the Portsmouth Road in Ripley that has not been properly considered.

POLICY A61 LAND AT AARON'S HILL, GODALMING: MAIN MODIFICATION MM36 & MM2

CPRE objects to this development proposal for 200 houses within the Pilgrims Ward of Guildford.

We have asked in our submission for the Inspector under MM2 to reopen the current examination to take account of the new lower population and household figures for Guildford and Waverley that have recently been produced by the Office for National Statistics. CPRE has worked closely in this context with the leading national expert Neil MacDonald both in Waverley District and in collaboration with the Guildford Residents Association (GRA) in Guildford.

We are opposed to the Aaron's Hill development proposals made for both sides of the Waverley/Guildford boundary which total 462 houses. It is clear to us that housing on a scale of 200 dwellings in Guildford District will result in adverse traffic congestion implications for the local road network and in particular Eashing Lane. It seems likely that there would be a substantial increase in vehicles seeking to reach the A3 and beyond on a daily basis. This could be very damaging to the small hamlet of Eashing with its ancient medieval bridge and community of attractive houses.

The submission of Shackleford PC (SPC) makes it clear that Aaron's Hill is currently protected as Green Belt and as part of an Area of Great Landscape Value (AGLV). It is intended that a review of the boundary of the nationally important countryside within and adjoining the Surrey Hills Area of Outstanding Natural Beauty (AONB/AGLV) in this area is to be made once the current study by Natural England of the Suffolk Coastal AONB has been completed. The proposed site is described by the SPC as "manifestly unsuitable for such a large-scale development" especially if the 262 homes proposed for Waverley District go ahead as well. Neither proposed settlement is consistent with the National Planning Policy Framework (NPPF). Development of the Green Belt is only permitted in "exceptional circumstances" that in our view should not be considered relevant in the current situation.

We are informed that the Leader of Guildford Council attended SPC's July meeting at which Ashil was also present and stated that GBC did not believe that the site was suitable for a large development which would be harmful to the area. We fully endorse the comments subsequently made by SPC in their submissions to GBC dated 30th August and 22nd October. We therefore urge that this proposed development be refused.

1. CPRE FUNDAMENTAL OBJECTION MM2
CPRE Guildford District wishes to state at the outset that it objects to the existing plan which calls for housing growth at a rate of 672 extra homes a year. We ask the Inspector to reopen the examination to take account of the new lower population and household figures that have recently been produced by the Office for National Statistics. The previous assessment of 672 additional homes is now out of date. CPRE has worked closely in this context with the leading national expert Neil MacDonald both in Waverley District and in association with the Guildford Residents Association (GRA) in Guildford. Neil MacDonald has demonstrated to GRA and CPRE that Guildford can achieve ambitious economic growth at the far lower figure of only about 360 homes per year. The calculation of this correction in Guildford's housing figure takes account of an overestimation of how many students stay in Guildford and have children after their course finishes.

2. DAMAGE TO GREEN BELT
The high housing figure proposed in the Plan can no longer be justified with its damaging impact on the Green Belt.

A new careful assessment needs to be made of the following strategic sites:

+ Blackwell Farm which adjoins the nationally important countryside of the Surrey Hills Area of Outstanding Natural Beauty and an Area of Great Landscape Value on the town's boundary

+ Wisley which is relatively remote from Guildford but dependent on expensive highway decisions yet to be made by Highways England

+ Gosden Hill which forms part of the attractive green approach to the town and prevents linear development along the A3 CPRE believes that more attention should have been given to the provision of appropriate accommodation in the town
with careful limits on building height. Our attention has been drawn to the fact that the requirement to locate brownfield sites for development was not met by GBC until very late in the consultation process.

Attached documents:

Comment: MM3 - LPMM18/2670  
Respondent: CPRE Surrey Branch & Guildford District (Tim Harrold) 8607169  
Agent:

S3  
The Town Centre policy is inadequate and does not address the infrastructure deficit. There is too much reliance on A3 improvements

Attached documents:

Comment: MM33 - LPMM18/2659  
Respondent: CPRE Surrey Branch & Guildford District (Tim Harrold) 8607169  
Agent:

5. BURPHAM MM33 Policy A241; MM35 Policy A25  
CPRE concentrates most of its attention on sites outside the town centre and urban development. However, we feel obliged to refer to the Response of the Burpham Community Association which clearly outlines the problems experienced in this community when it states that "the transport strategy is untenable" and "the Sustainable Movement Corridor is not a viable proposition". The ongoing issue of Godsden Hill and the traffic problems associated with its Green Belt entry to the town have been with us for many years. If anything the problems seem to grow in complexity for the community with more and more elements on the agenda for the regular meetings revolving around the issues of Aldi, Clay Lane, Merrow Lane, Park & Ride, Slyfield, and Thames Water to list a few. In our view it seems necessary for some form of infrastructure master plan to be prepared and reviewed in a public hearing on this topic in such a way that the strategy to be followed and the likely cost is discussed openly. If a change has to be envisaged for the Green Belt, then this will need to be addressed as "exceptional circumstances" at the time of the GBC Plan.

Attached documents:

Comment: MM35 - LPMM18/2660  
Respondent: CPRE Surrey Branch & Guildford District (Tim Harrold) 8607169  
Agent:

5. BURPHAM MM33 Policy A241; MM35 Policy A25  
CPRE concentrates most of its attention on sites outside the town centre and urban development. However, we feel obliged to refer to the Response of the Burpham Community Association which clearly outlines the problems experienced in this community when it states that "the transport strategy is untenable" and "the Sustainable Movement Corridor is not a viable proposition". The ongoing issue of Godsden Hill and the traffic problems associated with its Green Belt entry to the town have been with us for many years. If anything the problems seem to grow in complexity for the community with more and more elements on the agenda for the regular meetings revolving around the issues of Aldi, Clay Lane, Merrow Lane, Park & Ride, Slyfield, and Thames Water to list a few. In our view it seems necessary for some form of infrastructure master plan to be prepared and reviewed in a public hearing on this topic in such a way that the strategy to
be followed and the likely cost is discussed openly. If a change has to be envisaged for the Green Belt, then this will need to be addressed as "exceptional circumstances" at the time of the GBC Plan.

**Attached documents:**

**Comment: MM36 - LPMM18/2673**  **Respondent:** CPRE Surrey Branch & Guildford District (Tim Harrold) 8607169  **Agent:**

**POLICY A61 LAND AT AARON'S HILL, GODALMING : MAIN MODIFICATION MM36 & MM2**

CPRE objects to this development proposal for 200 houses within the Pilgrims Ward of Guildford.

We have asked in our submission for the Inspector under MM2 to reopen the current examination to take account of the new lower population and household figures for Guildford and Waverley that have recently been produced by the Office for National Statistics. CPRE has worked closely in this context with the leading national expert Neil MacDonald both in Waverley District and in collaboration with the Guildford Residents Association (GRA) in Guildford.

We are opposed to the Aaron's Hill development proposals made for both sides of the Waverley/Guildford boundary which total 462 houses. It is clear to us that housing on a scale of 200 dwellings in Guildford District will result in adverse traffic congestion implications for the local road network and in particular Eashing Lane. It seems likely that there would be a substantial increase in vehicles seeking to reach the A3 and beyond on a daily basis. This could be very damaging to the small hamlet of Eashing with its ancient medieval bridge and community of attractive houses.

The submission of Shackleford PC (SPC) makes it clear that Aaron's Hill is currently protected as Green Belt and as part of an Area of Great Landscape Value (AGLV). It is intended that a review of the boundary of the nationally important countryside within and adjoining the Surrey Hills Area of Outstanding Natural Beauty (AONB/AGLV) in this area is to be made once the current study by Natural England of the Suffolk Coastal AONB has been completed. The proposed site is described by the SPC as "manifestly unsuitable for such a large-scale development" especially if the 262 homes proposed for Waverley District go ahead as well. Neither proposed settlement is consistent with the National Planning Policy Framework (NPPF). Development of the Green Belt is only permitted in "exceptional circumstances" that in our view should not be considered relevant in the current situation.

We are informed that the Leader of Guildford Council attended SPC's July meeting at which Ashil was also present and stated that GBC did not believe that the site was suitable for a large development which would be harmful to the area. We fully endorse the comments subsequently made by SPC in their submissions to GBC dated 30th August and 22nd October. We therefore urge that this proposed development be refused.

**Attached documents:**

**Comment: MM37 - LPMM18/2671**  **Respondent:** CPRE Surrey Branch & Guildford District (Tim Harrold) 8607169  **Agent:**

**SITE SPECIFIC : A35 FORMER WISLEY AIRFIELD, OKHAM (MM37 & MM47)**

1. The addition of land to the South of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR air traffic control beacon regulations. This prevents construction within a certain radius.

2. Land to the South abuts the Ockham Conservation Area and increases the visibility of the site to and from the Surrey Hills AONB.
3. The biodiversity of the SNCI will be destroyed by the proposed development.

CPRE CONSULTATION RESPONSE: BLACKWELL FARM A26a

CPRE objects to the addition of Policy A26a (Blackwell Farm Access Road) to the Local Plan. CPRE has studied the submission made by Compton Parish Council in this context and is in full agreement with it in all respects. There seems no justification for adding this late item as a separate policy to A26 which covers the Blackwell Farm allocation. It is clear in the submitted Plan that the Blackwell Farm development cannot proceed without the link road so the two parts of the scheme should be presented together and separation is entirely unnecessary. The issue is clear: If a solution to the link road problem cannot be found then Blackwell Farm itself cannot be developed. The proposed separation was not raised as a matter for discussion at the Local Plan examination and there is no authority for it from the Inspector. It is necessary to make clear that the Blackwell Farm development depends on its link road to the A31 through part of the nationally important Surrey Hills Area of Outstanding Natural Beauty (AONB) and is located within an Area of Great Landscape Value (AGLV). CPRE therefore requests that Policy A26a is rejected and removed.

Attached documents:

Comment: MM39 - LPMM18/2658  Respondent: CPRE Surrey Branch & Guildford District (Tim Harrold)  8607169  Agent:

+ Decisions proposed for housing at Aarons Hill on both sides of the Guildford/Waverley boundary will lead to a major increase in congestion at Eashing as traffic seeks to gain access to the A3 and beyond. This late addition to the Main Modifications list surely needs to be deleted when one considers the revised housing requirement figures indicated by the Office for National Statistics.  
Statistics. POLICY A61 MM 36

Attached documents:

Comment: MM40 - LPMM18/2657  Respondent: CPRE Surrey Branch & Guildford District (Tim Harrold)  8607169  Agent:

4. ROAD TRAFFIC CONGESTION

All residents and many visitors to the town are aware of the deteriorating traffic congestion.

This is not just a matter of infrastructure in built-up areas but also the countryside. Here are examples of where sustainability is failing:
+ Decisions taken regarding new housing in Dunsfold and Cranleigh in Waverley District will lead to the use of country lanes through Albury, Blackheath, Chilworth, St Martha's, Shalford, and Wonersh. Narrow sinuous single track lanes with a "D" classification will be used to try to gain access to Guildford and elsewhere. Proposed development at Hornhatch Farm will further undermine the situation. POLICY A62 MM 40

Attached documents:
CPRE is very familiar with this site and with its past planning history. We object to its selection as a main modification to the draft Guildford Local Plan. There are a number of grounds for this objection which are given below.

1. The map of this Chilworth location omits to show that the boundary of the site is crossed by a gas main or indicate the position of a number of wells around the Horn hatch farmland. This information formed part of the ground investigation report dated February 2013 when a previous application for 30 houses at this site, to which both CPRE and Shalford PC objected, was refused.

2. The map also fails to show clearly that Hornhatch Farm adjoins the boundary of Wonersh Parish in Waverley District close to the grade 1 listed building of Great Tangley Manor House dating back to 1584, which is of national architectural significance, and located in attractive AGLV countryside that is to be considered by Natural England for upgrading to an Area of Outstanding Natural Beauty. Clearly, objection to another new development - this time for 80 houses - is likely to be made because of its proximity to what Pevsner describes as the most impressive of Surrey's half timbered houses. Although the site will be partially screened by trees, it must be recognised that these are subject to loss, damage and disease.

3. Objection to the construction of 80 houses at this site will be made not only by the inhabitants of Chilworth but also the communities of Shalford, St Martha, Wonersh and Albury. The prospect of additional traffic congestion will be extremely unpopular in this whole area which already suffers from severe tail-backs, which will deteriorate further as a result of Waverley BC plans for extra housing at Cranleigh and Dunsfold.

4. It has to be recognised that the Inspector has requested GBC to indicate Main Modification sites that will permit extra housing development to take place in the next 5 years without further delay. CPRE believes that GBC has not considered the problems which will result from their proposal, which will in our view require reconsideration of how to handle the road junction at Rice's Corner that has already been a source of disagreement with Surrey County Council over many years. To meet the requirement in terms of essential traffic improvement in this area, a great deal of extra money will have to be invested by sec at a time when it is generally acknowledged that they are financially in difficulty and resources are restricted. By adding to this financial burden the cost of tackling extra car congestion from 80 new houses is a daunting prospect, especially when one considers the poor service offered the community in terms of both current rail and bus services and its consequent reliance on private cars for work, medical services, secondary schools and anything beyond basic shopping.

CPRE therefore urges that this proposal be reconsidered and refused.

4. ROAD TRAFFIC CONGESTION

All residents and many visitors to the town are aware of the deteriorating traffic congestion.

This is not just a matter of infrastructure in built-up areas but also the countryside. Here are examples of where sustainability is failing:
+ Decisions taken regarding new housing in Dunsfold and Cranleigh in Waverley District will lead to the use of country lanes through Albury, Blackheath, Chilworth, St Martha's, Shalford, and Wonersh. Narrow sinuous single track lanes with a "D" classification will be used to try to gain access to Guildford and elsewhere. Proposed development at Hornhatch Farm will further undermine the situation. POLICY A62 MM 40

Attached documents:
Comment: MM41 - LPMM18/2669  Respondent: CPRE Surrey Branch & Guildford District (Tim Harrold)
8607169  Agent:

MM41

Transport strategy relies on inadequate modelling, including the delay in the Junction 10 Highways England RIS scheme of at least two years, which will impact all development that relies on this scheme. This will include Site A35 (former Wisley Airfield), Site A43 Garlicks Arch, Site A63 Land west of Alderton's Farm (MM44).

Attached documents:

Comment: MM43 - LPMM18/2664  Respondent: CPRE Surrey Branch & Guildford District (Tim Harrold)
8607169  Agent:

POLICY A62: Hornhatch Farm, land adjoining New Road, Chilworth

Proposed Early Housing development of 80 new houses

This Green Belt site consists of agricultural land within the area of Shalford Parish Council and close to the boundary of Waverley District. The proposed housing site would be visible from the nationally important countryside of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGL V) at the Chantry. It forms part of the Tillingbourne Greensand Valley which is described in the Guildford Landscape Character Assessment (GLCA) as a valley which provides a transport corridor with the railway and the A248 running along the flood plain from East to West through the largely linear development of the village of Chilworth. The GLCA which was published in 2007 refers to "continuing traffic congestion" and the need to "retain the character of the individual settlements avoiding merging these through dense linear development along roads." Anyone familiar with Chilworth will be well aware of the congestion at Rice's Corner at the junction to the West of the village of the A248 and the B2128 from Wonersh which occurs regularly at peak traffic periods throughout the day.

An application made for 30 houses to be built at this site in 2013 was refused largely on the grounds of unsustainability. It must be pointed out that both bus and rail services to and from Chilworth offer a very limited service. Most residents of the village rely on the car for transport. Walking to the station from the new larger development proposed would take 20 minutes each morning and evening as it is located at the other end of the village, or even a longer time to Shalford station which is still further away. There is no adequate parking at Chilworth station.

Owing to the traffic bottleneck which forms at Rice's Corner and the subsequent congestion on the A248 to Guildford, many car drivers seek to use Blacksmith and Halfpenny Lanes as a quicker "rat run" route to reach the county town each morning and evening. This causes a safety concern and objection in the Chilworth community at Blacksmith Lane within the area of St Martha's PC and for residents with in the adjoining GBC Holy Trinity ward to the North. These rural single track lanes are categorised as "D" because they are so narrow and sinuous, and Halfpenny Lane is sunken for much of its length. A weight restriction applies to vehicles over 7.5 tons which is not always observed. The GLCA refers to the desirability of restricting traffic flow along sunken lanes of this type which run up to the North from the Tillingbourne Valley. It is worth noting that the North Downs Way National Trail crosses Halfpenny Lane near a particularly dangerous corner. An extract from the GLCA states "Conserve the rural roads and sunken lanes minimising small-scale incremental change such as signage, fencing or improvements to the road network which would change their character".

Going back to before 2004 the Chilworth community were assured by the Surrey County Council (SCC) that a proposal was being considered to put in a roundabout at Rice's Corner junction between the A248 and the 82128 to reduce traffic congestion and to allow priority to be given to traffic on the A248. In June 2004 the Loca Committee considered this proposal from the Tyting Society but it was rejected as too expensive owing to the need to relocate a number of utility and other services at Rice's Corner. The minor road improvements made subsequently did not significantly reduce the traffic congestion problem which has increased steadily to this day. The current prospect of 80 additional new houses being built at Hornhatch Farm is daunting when one considers the car traffic that this would generate. The community will suffer if this
proposal proceeds further against the united opposition of the PCs at Albury, Blackheath, St Martha's, Shalford, and Wonersh. Moreover, we have to recognise that the housing development at Cranleigh and Dunsfold, which appears to have been approved by Waverley Council, will in addition cause further major congestion problems on all the relevant A roads and force additional traffic onto minor country roads and lanes that are already unable to cope with the vehicles that seek ways around trouble spots.

It should therefore not surprise anyone if there is objection to this development proposal which seems to have been added at a late stage and has little to endorse it.

Attached documents:

**Comment:** MM45 - LPMM18/2675  **Respondent:** CPRE Surrey Branch & Guildford District (Tim Harrold)

**PROPOSED 105 HOUSES FOR NORMANDY LAND BETWEEN GLAZIERS LANE & STRAWBERRY FARM, FLEXFORD**

As Chairman of CPRE Guildford, I have become very familiar with Normandy over many years, and in order to keep up to date I went for a walk on 19th October to review the location of this proposed site. This involved me accessing the nearest public right of way in proximity to its main lake and included a visit to the railway bridge overlooking the station and the countryside on both sides of Glaziers Lane. I felt it to be important also to assess the impact of other local development and of the steadily increasing traffic on Glaziers Lane, and at Wanborough, the A31 along the Hogs Back, and the A323. All of these roads will be severely affected by any further development growth along the lines proposed. It should be recalled also that Glaziers Lane has a "D" classification.

It was interesting to note the dryness of the clay soil as a result of the warm summer and autumn. Any new development would of course have to take account of the possibility of flooding problems during at least the winter and spring months. Development along the lines proposed would have a major impact on the current sewage system which is inadequate. It is a daunting prospect to consider when and how the sewage pipe under Glaziers Lane will need to be replaced. The road regularly requires attention owing to its vulnerability to the weight of heavy lorries that progressively damage its weak foundations.

I was present also at a very well attended meeting of the Parish Council on 2nd October at which I spoke together with the local MP, and the relevant Guildford Borough and Surrey County Councillors. It was interesting to note the overwhelming vote against this proposal from the estimated 200 people present.

To any visitor to the proposed development site in daylight hours, one is immediately conscious of the noise disturbance from the heavy equipment needed for concrete crushing and soil distribution at the neighbouring Backhurst facility. Bulldozers and diggers are constantly at work and would make living in any new development in their vicinity very unattractive. Additionally, it needs to be borne in mind that access to the proposed building site is located dangerously close to the Wanborough Station bridge. Because the site proposed is higher than housing on the other side of the road, car headlights will cause light pollution at night through the bedroom windows of houses facing the road as they drive to and from the new development. The amenity of those living opposite the estate entrance will be severely affected. It would appear that these major problems have not been adequately considered.

The presence of the lake is important to the wildlife in this area and to those lucky enough to have the chance to fish for carp in its water. Bats and owls have been seen in this location and should be protected. Deer are often present. I am informed that the owner has no intention to allow it to be sold and those who value the environment in the Normandy community will welcome this decision.

Describing the proposed site as a "village extension" is misleading. 105 houses represents a 7% increase in the number of dwellings in Normandy and Flexford. The site was not included at any time within the SHLA. It is highly sensitive Green
Belt land outside the settlement of Normandy and should be protected. GBC has failed to indicate the "exceptional circumstances" that are needed to redraw this Green Belt boundary. We question whether it is desirable to allow the expansion of Flexford North of the railway line and to encourage linear sprawl that will link this community with Normandy. It is also likely that the height of the buildings envisaged will be visible from the Surrey Hills Area of Outstanding Natural Beauty along the Hogs Back which is an undesirable outcome that should be avoided. It also appears probable that the development proposed will be unsustainable.

In the light of this letter and the reasons included in it, I hope that it will be clear that this site should not be approved as appropriate for consideration as a Main Modification to the GBC Local Plan. In our view, it seems unlikely that it should be considered in this context as we believe it involves land that will not be available within the next 5 years which invalidates its selection for consideration. CPRE therefore strongly objects to this proposal and urges that it be rejected as a Major Modification to the GBC Local Plan 2018.

MAIN MODIFICATION 45 (MM45): POLICY A64

PHOTOGRAPHS OF LAKE

I have already sent in an Email submission dated 19th October objecting to Main Modification 45.

Unfortunately, I was not able to gain visual access to the lake on my visit that Friday as the neighbouring rights of way which I used did not permit me to evaluate how attractive this landscape feature is.

I have now received the enclosed photographs of the lake which illustrate just how damaging it would be to the local environment if this Green Belt landscape were to be altered as a whole or in part to make way for the proposed new development.

I understand that the owner of this land wishes to maintain the lake as a spectacular feature of the rural environment which he and we value.

This would appear to indicate that the viability of the suggested development will be adversely affected. Accordingly, CPRE therefore questions whether it will be possible to implement the current proposal in its present form and during the time period a located.

We therefore urge that this modification to the GBC draft Plan is rejected and permission refused for it to proceed, bearing in mind not only its environmental aspect but also the other objections given in our separate email correspondence dated 19th October.
1. The addition of land to the South of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR air traffic control beacon regulations. This prevents construction within a certain radius.

2. Land to the South abuts the Ockham Conservation Area and increases the visibility of the site to and from the Surrey Hills AONB.

3. The biodiversity of the SNCI will be destroyed by the proposed development.

4. It is a breach of case law that an Appropriate Assessment and Habitats Regulation Assessment have not been completed.

Attached documents:
MM9
+Infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM3 - LPMM18/5992 Respondent: Guildford Borough Council (Tony Rooth) 8607585  Agent:

There is a serious question, potentially fundamental flaw in the submission Local Plan between the assessment of retail/office allocation especially in the town centre and the resulting demand for housing on the Green Belt.

In short, the town centre will not support the amount of planned retail in particular in the light of the continuing and increasing challenges presented by internet shopping.

The realistic situation is that shops in our town centre are closing because of various factors including business rates and rents. This can be seen from the number of empty premises especially on the Upper High Street, North Street and in the new Tunsgate Quarter. Many chains are not occupying or closing shops either because they do not have the continuing need for premises, are in financial difficulties (eg House of Fraser) or have gone into administration (eg Maplins).

This fundamental change in spatial allocation to the retail sector means that there is more land and potential for housing and other development in the town centre. A knock on effect would be to increase the potential for further housing on brownfield sites and hence reduce the pressure for housing in the Green Belt especially in the light of the potential reduction in housing need following the revised ONS figures.

Therefore, I think the council needs to carefully assess both the retail and office needs in our town centre and the potential additional space available for additional housing development there subject to suitable scale, height, design and views across our town centre landscape. The borough needs more affordable, social and public sector housing for the likes of nurses, police and other much needed public services.

Attached documents:

Comment: MM2 - LPMM18/2000 Respondent: WBDRA. (David Bird) 8608865  Agent:

WBDRA calls for a re-examination of the Guildford Draft Local Plan based on the new evidence which has come to light from the ONS regarding Housing Numbers - this relates specifically to MM2

Our Residents Group attended the very first public meeting on the Local Plan arranged by Guildford Boro' Council & their consultants GL Hearn

It was perfectly obvious from the outset that GL Hearn's figures did not stack up, their assumptions seemed amateurish and their logic flawed. Two prime examples were a vast overstatement of the town's Homeless which was wildly at variance with recently published figures in the national media and secondly, in answer to the question who have you (GL Hearn) consulted with re Development Numbers their reply was "Local Estate Agents & Developers", Based on this, any subsequent figures arising from GL Hearn have been met with extreme scepticism by many Resident Groups and Interest Groups such as Guildford Society & CPRE.

The local Residents Group (GRA) which comprise of about 30 Residents Groups in the Borough have enlisted the services of Neil MacDonald who has demonstrated that about 360 homes a year would support the ambitious economic growth rate being proposed currently
630 homes a year would be wildly out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions (such as those mentioned above) and those which inflate the figure eg excessive student homes in town, low economic participation.

It is also totally wrong to suggest that Guildford should sacrifice Green Belt (or other land) to provide homes for Woking. As far as we know Woking is proposing Green Belt development and Woking’s housing need figure has also been reduced and has not been examined.

WBDRA has never been a fan of GBCs Housing Development Plans ever since the last Local Plan (2003) and is more concerned about the lack of attention paid to infrastructure in the last 15 years. Guildford has the dubious honour of being Number 6 in the top 10 most traffic congested places in the UK - the top 5 all being cities not market towns.

Guildford can't sustain any more major Housing Development without rapid attention being given to traffic flow through the town. Every road into Guildford in the weekday morning rush hour is virtually at a standstill with major tailbacks for miles daily on all our main roads - the A3, A31, A281, A3100, A320 & others. More large numbers of houses in the Borough are not going to help those who are stuck in these daily tailbacks wasting valuable energy and sitting in some of the worst Traffic Pollution in the South East. If our Council could get something substantial on the table about improving traffic flow, road widening etc - then their housing proposals might find a little more favour with residents. No-one should pay £2000+ per annum in Council Tax to spend hours every week stuck in traffic jams.

WBDRA respectfully requests a re-opening of the Inspectorate's Examination to readjust Guildford's Housing Figures in line with those recently published by the ONS

Attached documents:

**Comment:** MM2 - LPMM18/898  **Respondent:** West Clandon Parish Council (John Stone) 8609217  **Agent:**

**Guildford Submission Local Plan: Strategy and Sites - Main Modifications**

Thank you for the opportunity to respond to the consultation on the above.

West Clandon Parish Council has very grave concerns about many of the proposed main modifications within the proposed plan and the subsequent impact on increased traffic problems on The Street, West Clandon (A247) which is already totally inappropriate to be classed as an A road and experiences many difficulties.

The road does not have the capacity to carry the expected increase in traffic. Problems already include:

1. *The sharp bend at the Lime Grove junction with The Street (A247) where traffic routinely exceeds the 30mph limit.***
2. *The dangerous junction with the approach road to Clandon Station where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump.*
3. *The site lines for the exit of the Onslow Arms car park.*
4. *The narrowness of the road near Summers.*
5. *Heavy lorries and buses being unable to pass each other in the narrow parts of the road without mounting the pavement.*
7. *The narrowness of the road at the Bull’s Head Public House.*
8. *The speed of traffic past Clandon Junior School and in places the narrow footpath for children walking to school.*
9. *The sharp bend with poor sight lines in either direction at the Church.*
10. *The lack of a continuous footpath through the length of the village.*
12. *The classification as an A-road without it having the capability of an A-road.*
Our concerns also include the following:

Policy S2 MM2
We believe the OAN included in the Plan may be overstated. We note the latest ONS household projections and current uncertainties over the methodology to be used in the calculation of the OAN. These issues must be fully explored and outstanding issues resolved before the housing need is finalised if we are to have any confidence in the figure adopted.

We also object to any unmet need for housing in the Woking area being added to the Guildford Plan when the review of the Woking Plan provides an alternative mechanism for correcting any shortfall within the Woking area.

Guildford has been obliged to introduce additional green belt sites in the early years of the plan. Should these prove to be unnecessary, Green Belt will have been damaged without good reason.

There will be greatly increased traffic flow because of the following modifications:

1. MM41. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
2. MM35 The development of 1800 houses at Gosden Hill.
3. MM44 The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. MM42 The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
5. A43a The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247. We object to the proposed opening of the Burnt Common Rds as this will direct additional traffic along an unsuitable road. In any event this should not be considered until the A3 widening is completed.

As an alternative to access to the A3 at Burnt Common further consideration should be given to South facing slip roads at Ockham Park which will have less negative impact on unsuitable local roads.

In any event Policy ID2 (MM27) generally gives insufficient assurance that developments will not be allowed before the A3 widening scheme is committed in that it appears to allow a series of incremental developments each in itself unlikely to make an already difficult situation much worse. Cumulatively we are concerned that the severe impacts envisaged will occur by stealth.

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Attached documents:

**Comment:** MM35 - LPMM18/900  **Respondent:** West Clandon Parish Council (John Stone) 8609217  **Agent:**

**Guildford Submission Local Plan: Strategy and Sites - Main Modifications**

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**Comment:** MM42 - LPMM18/902 **Respondent:** West Clandon Parish Council (John Stone) 8609217 **Agent:**

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Attached documents:

Comment: MM44 - LPMM18/6252  
Respondent: West Clandon Parish Council (John Stone) 8609217  
Agent: 3. MM44 The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.

Attached documents:

Comment: MM48 - LPMM18/6248  
Respondent: West Clandon Parish Council (John Stone) 8609217  
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Attached documents:

Comment: MM2 - LPMM18/2402  Respondent: Shalford Parish Council (Nuala Livesey) 8627201  Agent:

MM2 POLICY S2 PARA (1) Housing requirement for Guildford

Shalford Parish Council (‘SPC’) accepts that Guildford Borough Council (‘GBC’) is obliged to contribute to meeting unmet housing need in the Borough of Woking. However, it notes that the figures published by the Office of National Statistics on 20th September 2018 show a considerable reduction in predictions of future population growth. Councillors are aware that some respondents to this consultation suggest that, in the light of this new prediction, GBC and the Inspectorate should review the figures for housing need, with a view to making a reduction in them rather than an increase. SPC strongly supports this proposal.

Attached documents:
M43 POLICY A62 Allocation of land at Hornhatch Farm for approximately 80 homes

SPC opposes this allocation, because of concerns which it explains in this response. Some of these are well known to GBC, since the Council has opposed similar proposals in its responses to a planning application for 30 houses on part of the current site (13/P/00206) and to several consultations during the development of the draft Plan. Councillors have been told that the Inspector knows of all previous objections and that they should not be repeated in this consultation. However, we know that although the increase in the number of new homes is required by the Inspector, the decision about the choice of additional sites on which to build them has been made by GBC. It seems to SPC therefore that it must still be open to GBC to review its decision on the Hornhatch site, and we set out our concerns in the rest of this response.

Attached documents:

1 Loss of Green Belt land and further extension of Chilworth settlement boundary.

The Hornhatch site consists of red-rated Green Belt land, is adjacent to the AGLV and is in close proximity to the Surrey Hills AONB. It is likely that under a pending review much of the nearby AGLV, including Chinthurst Hill, will be included in an extended AONB. In addition, the Sustainability Appraisal Report Addendum (‘SARA’) notes that it is adjacent to Wonersh Common:

‘which while not designated as an SNCI is designated common land, potentially indicating a degree of biodiversity value’ (p.58).

SPC appreciates that all but one of the new Green Belt sites are red-rated, but it appears that Hornhatch is situated nearer to an AONB than are any of the other sites. At present the undeveloped farmland forms part of a visual link between the hills of the Chantries to the north and the area of Blackheath to the south. The surrounding fields and streams provide a valuable wild-life site, and are part of the undeveloped countryside which separates the villages of Shalford and Wonersh. We note that the requirements and key considerations for Hornhatch set out in Policy 62A recognise the significance of this site.

We note from SARA’s assessment of the other Green Belt sites under consideration that it is important for the remaining GB land to retain strong and defensible boundaries. Unfortunately, this does not appear to be the case with the Hornhatch site, which, once developed, would seem to invite further development over the fields surrounding it – on the grounds that future sites are ‘just outside the settlement boundary’.

A final reason for SPC’s concern about the use of these Green Belt sites relates to the predicted decline in population growth and the hope that this will prompt GBC and the Inspectorate to reconsider the targets for provision of new homes (see comment on MM2 above). Against this background, it seems particularly inappropriate to prioritise the use of Green Belt land during the first five years, with the risk that a drop in demand may make the later development of brown-field sites unattractive to developers.

2 Capacity and deliverability of site

The question of whether the site can accommodate approximately 80 homes is of course a matter for the developer and GBC’s planning team, who must be aware of the limitations of the site noted in the earlier application for residential development (P/13/00206). We understand that the layout of any development will have to accommodate the underground gas pipe which runs through the whole of the site (along a line parallel with the back boundary of Tillingbourne School’s playing field and then diagonally across the rest of the site). It appears that it would not be possible to build over this pipe, and in consequence an open strip of land would have to be left above the route of the pipe across the whole estate. This is obviously a technical matter for the experts, but it is a matter of concern for SPC because...
the lack of a defensible boundary to the adjoining Green Belt suggests that there could be a risk of the site being extended to cover any shortfall in the allotted quota of new homes.

We note that SARA (p.15) considers that the site could be delivered in full within the first five years, but to SPC the underground gas-pipe, coupled with the low-lying level of the site, the near-by streams and the apparent presence of wells on the site all combine to raise questions about its timely delivery.

3 Sustainability of site

Having assessed the site against the criteria for sustainability, SARA (p15) comments that Hornhatch ‘performs well relative to other village Green Belt sites’ under consideration’. The SPC can understand that on paper this may appear correct (the site ‘ticks the boxes’ on matters such as railway stations and GP surgeries), but we know that the reality on the ground is different.

Our principal concerns about the sustainability of an 80-home estate on this site relate to

A - pressure on limited facilities

B - volume and congestion of traffic on local roads

A Pressure on limited facilities

Facilities in Chilworth are limited to: a railway station (which we consider later in this response), a post office, a small convenience store, and two schools - the Church of England Infant School and Tillingbourne Junior School. Residents have to travel out of the village for work, for anything beyond basic shopping, to secondary schools and sixth-form colleges, and to access medical services.

SPC is not aware of any current pressure on places at the schools in Chilworth, but it is likely that the proposed development could create much greater demand.

Proximity to a GP surgery is clearly an important factor in the assessment of sustainability, and SARA notes the Wonersh practice as satisfying this requirement for the Hornhatch site. However, this surgery is already heavily used by residents from a wide catchment area, which apparently now extends as far as Cranleigh. The practice is under real pressure, and has to operate a telephone diagnosis system before offering appointments. It seems most unlikely that it would be able to take on the extra number of residents from an 80-home estate, and at present this is one of SPC’s major concerns about the proposed development.

B Volume and congestion of traffic

The proposed site lies along the A248, and its entrance and exit would be located on this road. The A248 already carries a heavy and increasing volume of traffic, resulting from:

- use by through traffic (including HGVs) as part of a route to by-pass Guildford on journeys between the A 31 and A3 in the west and the A25 in the east
- growth in the volume of through traffic from the south (along the B2128 which joins the A248 at the Rice’s Corner junction), which will continue to increase with major residential developments in the Borough of Waverley
- residential developments in Chilworth – during the last few years, more than 40 new homes have been built in the village; most of these provide parking spaces for two cars, which add to traffic on A248.

This volume of traffic on the A248 results in considerable congestion at peak times:

- at the Rice’s Corner junction, where traffic on the A248 has to give way to traffic entering and leaving the B2128, with resulting tailbacks through Chilworth village
- through Shalford on Kings Road and the approach to the A281
- through the length of Chilworth village - a linear village lying along the A248 (known as New Road in Shalford Parish and as Dorking Road in St Martha Parish). New Road is particularly narrow, and congestion is increased
by residents’ need to park cars on both sides of New Road, in the absence of off-road parking. Congestion is
further increased in term-time by cars delivering and collecting children from the two schools in the village
• through the centre of Albury and on the approach to the A25

The proposed estate at Hornhatch would inevitably create further traffic and congestion on the A248. These days most
families require parking space for at least two cars, and a conservative estimate suggests that well over 100 cars could be
joining the A248 at peak times.

SPC knows from SARA (p.32) that a key point in assessing a site’s sustainability is:
ability to access key destinations – i.e. services/facilities and employment – via walking, cycling and public transport (or
via short car journeys).

Public transport for residents in Chilworth consists of a limited train service and an even more limited bus service.

Trains Although Chilworth station is on the Reading-Redhill line, which provides access to destinations such as
Guildford, Dorking and Gatwick:
• service from Chilworth in both directions is limited (one train an hour at peak times, dropping to one every two
hours at off-peak)
• the station is at the opposite end of village from the Hornhatch site – an approximate distance of 1.2 miles (or
just short of 2 km) – and on the far side of the level-crossing over A248 -which itself causes traffic delays and
congestion
• the walk to the station is not attractive for pedestrians – on narrow pavements broken by side turnings from
which traffic enters the main road
• cyclists have to make their way along the road between traffic and parked cars – there is no cycle path and only
a few cycle racks at Chilworth station.

Shalford station is within walking and cycling distance of Hornhatch, but offers the same limited service. The journey
could also be made by car, thus adding to the parking problems in Shalford.

Buses A limited service between Guildford and Dorking runs along New Road: once an hour Mon-Sat; at 2-hour
intervals on Sunday; last bus of every day at approx. 7.00pm. The only other buses serving Chilworth are: one a day to a
secondary school in Guildford; one a day to Cranleigh and one a week to Godalming.

This level of public transport means that present – and future – residents of Chilworth are almost entirely
dependent on travel by car.

Mitigating Impact on the community

The proposed development, with its resulting traffic problems and pressure on Wonersh surgery, would have an adverse
effect not only on our residents but also on many people living in the neighbouring parishes of Albury, St Martha and
Wonersh.

We note (SAAR p.33) that GBC has:
confidence in the ability to suitably avoid or mitigate effects …. through the development management process.

Accordingly SPC ends this response with a list of the measures it considers would be required to mitigate the
effects of the proposed development.

The two most important requirements are:
• Traffic management scheme for Rice’s Corner junction – to include appropriate provision / priority for
pedestrians and cyclists, including those using the Downs Link which crosses the Cranleigh Road c100m south
of the junction
• additional provision for medical services, either at the Wonersh surgery or elsewhere in the Chilworth area
Improved facilities for pedestrians and cyclists, with aim of reducing car dependency in Chilworth - to include:

- upgraded footway and cycle path between Shalford and Rices Corner, leading to crossing on A 248 adjacent to Hornhatch site
- pedestrian and cyclist crossing point on A248 between Hornhatch and St Thomas’ church (at present there is no crossing anywhere along this road)
- consideration of new footway and cycle route through western part of Chilworth – possibly beside railway line along existing path between Hornhatch Lane and Old Manor Lane
- additional cycle racks at Chilworth and Shalford stations
- Bus shelters at nearest bus stops on New Road (both sides)
- Electric vehicle charging points for each property / roadside electric vehicle charging points for any properties without off-street parking

In addition, SPC considers that plans for the estate must include:

- A mix of housing across the whole development that is appropriate to the needs of local people i.e predominantly two and three bed properties with perhaps a small number of four bed properties
- the full 40% quota of affordable housing, providing a predominance of rented accommodation - GBC must not be persuaded to accept any payment in lieu;
- play and exercise facilities – either within the estate or in the surrounding area – if possible, to include a multi-use games area (MUGA)

Attached documents:

Comment: MM5 - LPMM18/2403  Respondent: Shalford Parish Council (Nuala Livesey) 8627201  Agent:

MM5 POLICY H1 PARA (4.2.23) Provision of transit site for Gypsies and Travellers

The draft Plan submitted to the Inspectorate stated that the TTA (2017) had ‘found no evidence of need for a transit site within our borough’. The proposed amendment adds the following statement:

The Council will keep this position under review and should the need for a transit site arise, will work with neighbouring authorities to address this.

SPC welcomes this as a step in the right direction, but in the light of events during summer 2018 urges GBC to delete the whole text and substitute a new statement which recognises the need for such sites and commits the Council to working with other authorities to provide several transit sites in the SCC area as a matter of urgency.

Attached documents:

Comment: MM11 - LPMM18/4646  Respondent: Worplesdon Parish Council (Gaynor White) 8627393  Agent:

Policy P4 – Flooding, flood risk and groundwater protection zones Policy para (2) & (3)

SUPPORT: Worplesdon Parish Council welcomes the changes regarding flooding and supports them, insofar as they go.

Attached documents:
Policy P5 – Thames Basin Heaths Special Protection Area

OBJECT: Worplesdon Parish Council does not believe that SANG and SAMM will prevent the adverse effects of residential development on recreational use of the SPA/SSSI based on previous experience.

Attached documents:

Policy S2 – Planning for the borough – our spatial development strategy

OBJECT: Worplesdon Parish Council objects in the strongest possible terms to having to accept Woking Borough Council’s unmet need. Guildford cannot accommodate its own housing need without encroaching onto the Green Belt. The Council objects to the proposed urban extension of land north of Keens Lane due to its proximity to Whitmoor Common SPA/SSSI and the likely impact on the A322, which is already at capacity. A habitat assessment should be carried out.

Attached documents:

Policy ID1 – Infrastructure delivery

SUPPORT: Worplesdon Parish Council supports the use of Grampian conditions to secure infrastructure when it is needed.

Attached documents:

Policy ID4 – Green and blue infrastructure

SUPPORT: Worplesdon Parish Council welcomes the changes regarding flooding and supports them, insofar as they go.

Policy MM29 Para 4.6.47 to 4.6.48b
**SUPPORT:** Worplesdon Parish Council welcomes the changes in respect of flooding and supports them, insofar as they go.

Attached documents:

**Comment:** MM36 - LPMM18/4651  **Respondent:** Worplesdon Parish Council (Gaynor White) 8627393  **Agent:**

Policy 26 – Blackwell Farm, Hogs Back

Policy MM36 (13)

**SUPPORT:** Worplesdon Parish Council welcomes the changes in respect of flooding and supports them, insofar as they go.

Policy box opportunities Use of Blackwell Farm as a strategic site

**SUPPORT:** Worplesdon Parish Council welcomes the changes in respect of flooding and supports them, insofar as they go.

Policy A26

**OBJECT:** The Council strenuously objects to the proposed use of Blackwell Farm due to its proximity to the AONB and the likely detrimental impact on traffic.

Attached documents:

**Comment:** MM9 - LPMM18/4640  **Respondent:** Worplesdon Parish Council (Gaynor White) 8627393  **Agent:**

**FORMAL RESPONSE TO THE MAIN MODIFICATIONS CONSULTATION**

Worplesdon Parish Council wishes to comment on the main modifications as follows:

**Policy P2 – Green Belt** Policy MM9 – Limited infilling

**OBJECT:** Worplesdon Parish Council objects in the strongest possible terms to the proposed infilling outside the settlement boundary in the following villages:

1. Jacobs Well
2. Fairlands
3. Wood Street Village; and
4. Worplesdon

Attached documents:
Comment: MM13 - LPMM18/5442  Respondent: Julian Cranwell 8640353  Agent:

MM13

The projected need for retail space is vastly inflated and should be severely cut to make room for urban homes. The projections presented, which might have seemed credible five years ago, seem to ignore how high streets are evolving with retail bankruptcies, the rise of online shopping etc.

Attached documents:

Comment: MM2 - LPMM18/5438  Respondent: Julian Cranwell 8640353  Agent:

Guildford Local Plan: Strategy and Sites - Main Modifications 2018: consultation response

MM2

I object to the identification of the HMA with the tri-borough area of Woking/Guildford/Waverley. This is arbitrary and has never been justified in real-world terms of where residents live, work, shop, commute and study. The need to include Woking’s unmet housing need is therefore based on a false premise enshrined in the SHMA.

It is factually untrue that the OAN has been based on “the latest 2018-based population projections.” September 2018 figures suggest 301 dpa, or just over 5,700 for the plan period. Taking account of the commitments, unallocated LAA sites and windfalls listed, green field development in the protected Green Belt is plainly unnecessary to meet the OAN, especially as new Policy S3 now requires urban brownfield be given priority. No “exceptional circumstances”, as required by the NPPF, have been advanced for any Green Belt development or for “insetting” most of the borough’s villages.

To meet this reduced OAN, the balance of urban development should be shifted radically away from the dying retail sector towards building homes, in line with government policy, uplifting the Guildford Town Centre figure considerably. Promoting the soft option of building in the Green Belt will only disincentivise developers from tackling the much-needed regeneration of central Guildford, directly conflicting with Policy S3.

GBC have claimed that the new ONS figures are inapplicable because the submitted local plan pre-dates the government’s new standard method for calculating housing need. This is splitting hairs. The “Objectively Assessed Need” should be what it says it is – objective. The plan should be based on the best and latest evidence available and needs to adapt in line with the facts.

Attached documents:

Comment: MM23 - LPMM18/5443  Respondent: Julian Cranwell 8640353  Agent:

MM23

The changes to Policy D1 water down some vital social requirements, set out in national policy, that aim to make development sustainable. Provisions on walking distances and cycle routes and on large developments of over 25 units, for instance, have been deleted and replaced with less specific text that gives a freer hand to developers to get away with socially unsustainable building.

Similarly, the deletion of Policy D4 is not justified as it met the soundness test.
I object to the "insetting" of any villages around Guildford, and the disproportionate level of development proposed to the Horsleys.

GBC has never given any rational explanation for doing this and have failed to offer any reasoned "EXCEPTIONAL CIRCUMSTANCES" to remove any areas from the Greenbelt.

I object to Greenbelt removal.

I object to the development of over 2000 houses at Wisley/Ockham, "Three Farms Meadows" (also called Wisley airfield) was refused by the Secretary of State. His reasons included unsustainability, catastrophic impact on local rural life and the impact on the character of the area. GBC should not give the owners more time and consultations in order for this land to be developed. I object to this area being included again.

Attached documents:

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**Comment:** MM3 - LPMM18/5439  **Respondent:** Julian Cranwell 8640353  **Agent:**

**MM3**

Policy S3 needs to be stronger all round. Most of the borough’s population live, and want to live, in the Guildford urban area. Urban regeneration, not car-dependent Green Belt housing, should therefore be the centrepiece of the plan. This would be more consistent with national policy and GBC’s own spacial strategy.

The current wording evades several major issues and is too open to loose interpretation in years to come. It needs -

- explicitly to prioritise residential over retail (see above).
- to make plain that the town’s character, including “important views”, can only be protected with a presumption that height will be limited (depending on exact location) to about 4-6 storeys.
- to make more explicit the link between giving “priority for pedestrians and cyclists over motor vehicles” and more realistic, higher housing densities that incentivise walking and cycling, rather than low-rise, suburban-type homes in the town centre with gardens and garages. All this is do-able without compromising character, as London has shown.
- needs to highlight the important role town-centre development can have in kick-starting and front-loading the whole plan, boosting housing numbers in the early years as government policy requires, leveraging GBC’s comparative advantage (relative to greenfield development) as an urban landlord.

Attached documents:

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**Comment:** MM7 - LPMM18/5440  **Respondent:** Julian Cranwell 8640353  **Agent:**

**MM7**

The viability exception (2) is too permissive. It is open to abuse by developers and should be deleted to protect the countryside.

Attached documents:
**Comment:** MM9 - LPMM18/5441  **Respondent:** Julian Cranwell 8640353  **Agent:**

Development in the Green Belt should be restricted in accordance with the NPPF, full stop. Instead, this policy appears to be to seek out and broaden loopholes in Green Belt protections beyond the exceptional circumstances permitted in the NPPF.

With its tortured and ambiguous wording, MM9 adds dangerous layers of challengeable interpretation to national policy that only confuse what is and is not permitted.

The repeated phrases under MM9 (1), for example, appear to go round in circles and are impossible to follow. Under “limited infilling” (2)c(i)-(iii) subjectivity reigns. It could be made a little clearer by deleting “should be considered to be” by “is” in each case. Many villages are highly diffuse or leggy in shape, so any room for confusion about what is “within the village” needs to be restricted.

MM9’s biggest defect, however, is the absence of any positive defence of the Green Belt, despite this covering 81% of the borough’s area. The plan is widely seen by residents as declaring war on the countryside by “insetting” most of the borough’s villages, extending settlement boundaries, removing SNCI protections and prioritising greenfield housing estates over urban regeneration. As currently worded, MM9 risks upsetting the difficult balance between protection and development set out in national policy. Insetting and settlement boundary extension on this major scale is unnecessary and amounts to a general pre-determination in favour of future planning applications. MM9 should not pre-judge these and the relevant maps at Appendix H should be removed.

**Attached documents:**

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**Comment:** MM27 - LPMM18/1059  **Respondent:** Allan Howlett 8656417  **Agent:**

Transport strategy MM27, MM41, MM42, MM48

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.

The road network is in desperate need of a major maintenance programme. In Send the surface at the traffic light intersection has completely broken up with holes appearing in all approaches. This non slip surface has broken down, wasted money, poor design. Or too much traffic?

The bridge over the A3 on the Clandon road has had the road surface pushed into the kerb resulting in large undulations that force motorists into the middle of the road.

Priority should be given to getting existing roads into a reasonable condition over the building new developments that will only increase traffic and make the matters worse. Most roads in the areas have kerb stones, and service covers dislodged and numerous potholes.

Who decides what a reasonable time is to queue on the roads into and out of Guildford and Woking getting to and from work. What is the environmental impact of thousands of cars, Lorries and busses queuing every morning and evening polluting the atmosphere, wasting fuel and residents and commuter’s time?

**Attached documents:**

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**Comment:** MM41 - LPMM18/1060  **Respondent:** Allan Howlett 8656417  **Agent:**
Transport strategy MM27, MM41, MM42, MM48

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.

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Attached documents:

Comment: MM41 - LPMM18/1065  Respondent: Allan Howlett 8656417  Agent:

M41 Garlick's Arch

This development has no immediate affect on where we live, but will bring additional traffic to the area. As it is a remote development I have yet to see anyone addressing the problem of supplying new infrastructure, ( mains services, schools, medical facilities, etc.), to this project and who will bear the costs. Will it fall on local taxpayers to put in the required infrastructure.

The A3/M25 interchange is already congested on and off every morning,

At least new residents will be able to access the main supermarkets up and down the A3 in Guildford, Brooklands and Cobham, but only will further increase congestion on the A3.

I confirm that I have a general objection to these proposals and specific objections to the modifications, which I do not consider as minor, MM9, MM27, MM41, MM42, MM44, and MM48

Attached documents:

Comment: MM42 - LPMM18/1061  Respondent: Allan Howlett 8656417  Agent:

Transport strategy MM27, MM41, MM42, MM48

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.
The road network is in desperate need of a major maintenance programme. In Send the surface at the traffic light intersection has completely broken up with holes appearing in all approaches. This non slip surface has broken down, wasted money, poor design. Or too much traffic?

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Who decides what a reasonable time is to queue on the roads into and out of Guildford and Woking getting to and from work. What is the environmental impact of thousands of cars, Lorries and busse that are queuing every morning and evening, polluting the atmosphere, wasting fuel and residents and commuter’s time?

Attached documents:

Comment: MM44 - LPMM18/1063  Respondent: Allan Howlett 8656417  Agent:

MM44 Alderton's farm

This option was deleted in the original plan after local objection, but has been reinstated without justification. There are no special reasons that have identified from the original decision.

Access onto the rat run will only make the route more dangerous around the green where the sight lines are already insufficient for the traffic that uses it at present without adding further traffic.

Together with Garlic’s arch this increases the house density in Send by some 45%.

Much of this development is in an area designated as flood plane. I recall that Council houses built in a flood plane near Guildford were flooded out resulting in huge repair, flood defence and compensation costs. Wasting taxpayers’ money. Stop building on flood planes.

Attached documents:

Comment: MM44 - LPMM18/1064  Respondent: Allan Howlett 8656417  Agent:

MM44 Burnt Common industrial development

There is no case made for additional industrial land. Existing premises on the Portsmouth road remain undeveloped. The existing level of development is being abused with cars parked on the road over the cycle lanes. The river at the end of the A3 slip road already floods closing the road for extended periods during heavy rainfall. The roundabout at Burnt common is overloaded at peak times. It is clear that industrial developments in Guildford are underdeveloped and if developed would offer jobs for local residents without having to travel out of town. There is no need for more job opportunities in the area.

Attached documents:
Comment: MM48 - LPMM18/1062  Respondent: Allan Howlett 8656417  Agent:

Transport strategy MM27, MM41, MM42, MM48

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.

The road network is in desperate need of a major maintenance programme. In Send the surface at the traffic light intersection has completely broken up with holes appearing in all approaches. This non slip surface has broken down, wasted money, poor design. Or too much traffic?

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Who decides what a reasonable time is to queue on the roads into and out of Guildford and Woking getting to and from work. What is the environmental impact of thousands of cars, Lorries and busses queuing every morning and evening polluting the atmosphere, wasting fuel and residents and commuter’s time?

Attached documents:

Comment: MM9 - LPMM18/1058  Respondent: Allan Howlett 8656417  Agent:

Guildford Local Plan Public Examination

I wish to object to the Local Plan both in general and specifically to Main Modifications MM9, MM7, MM41, MM42 and MM44.

My general objection is that the proposed modifications to the Local Plan are unjustified. Has anyone considered what the limit is on continued development? At what stage will we be full up? That is: 'When does the built environment take precedence over the remaining green belt’.

When will the road infrastructure no longer be sufficient to serve all those living in the Guildford area? Traffic densities coupled with infrastructure maintenance costs overwhelm the tax payer. It is now a lottery to plan getting around without encountering heavy traffic and delays. On roads that are a poor state of repair.

Get that balance right first before attempting mass developments that are destroying apparently protected green space MM9

Full of loopholes in so far as everything is protected except for very special circumstances. Who decides what special circumstances? Residents’ views are ignored. It appears that the needs of speculators and developers take precedence over the views of residents.

The Green belt was developed and designated to protect the public from over development. Already the most densely populated country in Europe; it is time to say ‘no more’.

Attached documents:
Dear Sir/Madam,

Many months ago, and way before the June/July consultation regarding amendments to the new local plan, I attended a meeting at West Horsley Village Hall at which Paul Spooner – the leader of GBC – spoke to enlighten us about the progress or otherwise of the threat to increase the housing size of our village by over 30%. He told us that a government inspector, namely Johnathan Bore, had been appointed to oversee and advise on proposed alterations to the latest local plan. [text redacted: the text included a quote that was not wholly accurate] said Mr. Spooner so imagine my complete dismay when I read this week in the Surrey Advertiser that GBC of all people have proposed an additional 555 homes on green belt land. What on earth is going on?

With the latest figures from the ONS confirming that required housing targets are grossly over-estimated, combined with yesterday’s figures that EU nationals wanting to work in London have dropped by 26% (and 22% in the country as a whole), with dire predictions from the Governor of The Bank of England regarding a drop in house values then surely, surely it is folly to blindly forge ahead with the current plan and it’s new amendments. An oversupply of housing will cause grief for many hard working young home owners who will be anxious about the prospect of negative equity. I am well aware that a great deal of hard work has gone into cobbling together this plan but that is no reason to persevere with something that is manifestly incorrect. For the sake of accuracy, if not democracy, the EXAMINATION IN PUBLIC must be re-opened.

It seems peculiar to say the least that I was not informed by GBC of this current consultation let alone the fact that I have never had a response to any of my many emails over the years concerning the green belt field next door to my house save for the alleged assurance that all correspondence will be passed to the inspector - I wouldn’t mind betting that he knows nothing about it.

Attached documents:
I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

I would like the Inspector to RE-EXAMINE the Local Plan because:

2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.
What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

   **Attached documents:**

**Comment:** MM23 - LPMM18/3766  **Respondent:** Victoria Sinnett 8667713  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.
MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/3773  Respondent: Victoria Sinnett 8667713  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/3764  Respondent: Victoria Sinnett 8667713  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/3767  Respondent: Victoria Sinnett 8667713  Agent:
MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange

Attached documents:

Comment: MM32 - LPMM18/3768  Respondent: Victoria Sinnett 8667713  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/3769  Respondent: Victoria Sinnett 8667713  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/3770  Respondent: Victoria Sinnett 8667713  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/3771  Respondent: Victoria Sinnett 8667713  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.
Comment: MM44 - LPMM18/3772  Respondent: Victoria Sinnett 8667713  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/3765  Respondent: Victoria Sinnett 8667713  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM45 - LPMM18/637  Respondent: Gordon Holliday 8667937  Agent:

With no up-grade of the sewer system in Glaziers Lane this would be a catastrophic mistake to build 105 houses on this site. I'm sure you are aware of the sewer pipe under Glaziers Lane is 160mm/5" in diameter, which at the present can only just cope. Two hundred and ten extra toilets using this sewer pipe would be disastrous.

Glaziers Lane is a D-class road which in layman's terms means it has no foundations, so the road surface is always sinking in various places. The extra traffic would cause no end of problems.

The proposed site is very near to 'Backhurst' who supply soil and crush concrete. This site creates lots of noise during day light hours with bulldozers, metal buckets and diggers banging and crashing throughout the day, so these fields act as a sound buffer. It would be very thoughtless to build house so close to this site.

A turning into the proposed housing site would be very dangerous considering how close it would be to the Wanborough Bridge. Also, car headlights coming out of the site would illuminate the bedrooms on the other side of the lane because the houses are built lower to the level of the road. This would be very unfair on those residents to endure such a torment.

The 2-proposed fields for the 105-houses would block-out the view from the road of the old brickworks chimney, which is of historic importance because most of the bricks that built Guildford Town came from this site.

One of the proposed fields put forward for luxury houses involves a beautiful lake, which is teeming with wildlife. This would be sacrilege to destroy such a delightful area. I would ask you come and visit this secret oasis in the heart of Normandy and see for yourself. A natural spring from the Hogs-Back feeds a stream near by and also the lake. To eradicate such a jewel in the crown of Normandy would be a crime against humanity.

The Aldershot to Guildford Road (A323) is a nightmare in the rush hour and once again needs widening to help with the flow of traffic through Normandy.

Attached documents:
9 Policy MM13 I object to GBC reserving brownfield sites in Guildford town centre for further retail outlets. Shops are closing all around the town. These sites should be used for low-cost housing in low-rise flats. With the change in policy regarding Council Housing, GBC should not be lending money to the university for student accommodation but borrowing in order to provide social housing.

Attached documents:

1. I object to the "insetting" of any villages around Guildford

8. Policy MM2. There is no reason for Guildford to take any unmet need for housing as Woking used their right to claim that "need for housing was not a reason for building on Greenbelt land". Also the ONS statistics clearly reveal that about half of the number of houses that had been forecast as necessary is actually needed, particularly in the light of new analyses of student movements. I object to taking any housing from Woking.

Attached documents:

11 I object to Blackwell Farm being included in the Plan. It will impact on an area more than 20 miles to the North.

Attached documents:

3. The development of over 2000 houses at Wisley/Ockham, "Three Farms Meadows" (also called Wisley airfield) was refused by the Secretary of State. His reasons included unsustainability, catastrophic impact on local rural life and the impact on the character of the area. GBC should not give the owners more time and consultations in order for this land to be developed. I object to this area being included again

4. The houses, if built at Wisley, cannot be occupied until the A3/M25 junction is rebuilt, which will not happen for many years.

5. I object to yet more land having been added to the proposed development site

Attached documents:
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<tr>
<th>Comment: MM41 - LPMM18/3281</th>
<th>Respondent: Valerie Thompson 8671969</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>10 I object to Send being overwhelmed with huge housing estates, which will require residents to commute in thousands of extra cars in the narrow roads of Send, Ripley and Horsley. The schools and surgeries locally will not be able to accommodate so many extra people.</td>
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<th>Comment: MM50 - LPMM18/3278</th>
<th>Respondent: Valerie Thompson 8671969</th>
<th>Agent:</th>
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</table>
| 6. **MM47 I object to the loss of more SNCI land at Wisley**  
7. **I object to the fact that the Appropriate Assessment and Habitats Regulation Assessment have not been completed. This is a breach of case law!** |
| Attached documents: |

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<tr>
<th>Comment: MM9 - LPMM18/3276</th>
<th>Respondent: Valerie Thompson 8671969</th>
<th>Agent:</th>
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<tr>
<td>2. You have never given any rational explanation for doing this and have failed to offer any reasoned &quot;SPECIAL CIRCUMSTANCES&quot; to remove any areas from the Greenbelt. <strong>I object to Greenbelt removal</strong></td>
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<tr>
<th>Comment: Other comments - LPMM18/3285</th>
<th>Respondent: Valerie Thompson 8671969</th>
<th>Agent:</th>
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| 12 **I object to the fact that at the examination by Mr Bore, Wisley Action Group had provided information on legal matters but were not permitted to respond during the enquiry to GBC statements. This was immoral if not illegal.**  
13 **I demand that the examination be re-opened as statements were made that the Plan was "Sound" but it was not, since Mr Bore asked for further information and changes to be made by GBC, therefore the Plan was not complete, therefore could not be regarded as "Sound"** |
| Attached documents: |

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<tr>
<th>Comment: MM13 - LPMM18/6106</th>
<th>Respondent: Mr Kes Heffer 8672993</th>
<th>Agent:</th>
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<td>• The evidence base for retail provision is also out of date and does not take into account the growing trend towards online shopping. The land allocated for retail in Guildford centre could be better used for housing,</td>
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249 of 2554
thereby relieving some of the development proposed for the Green Belt land in the Borough. Estimates have been made that some 3500 dwellings could be added to the town centre, contrasting with just 863 as proposed in the draft Local Plan. It would be a disastrous legacy to build further shopping centres that are not occupied in the town centre whilst destroying more of the Green Belt than necessary. I object to MM13.

Attached documents:

Comment: MM2 - LPMM18/6105  Respondent: Mr Kes Heffer 8672993  Agent:

- Both original and 2018 versions of NPPF require planning authorities to base their Local Plans on data that are relevant and up-to-date (see NPPF March 2012, paragraph 158, and NPPF July 2018, paragraph 31). On 20/09/2018 the Office of National Statistics released their “2016-based household projections: detailed data for modelling and analytical purposes”. Those data are the correct basis for Guildford’s Local Plan. This means that the official projected household figures (2015 to 2034) have decreased by 4,507 dwellings from a total 11,142 (used in the December 2017 draft Plan) to 6,635, a reduction of 40%. The latter figure is relevant to the September 2018 draft Plan but has not been used as the basis for housing targets. The extent of this error is 35.8% (4,507 / 12,600) of the housing requirement of the entire Plan; i.e. more than two of the strategic sites. The draft Plan is therefore unsound and GBC would be neglecting their legal duty if the Local Plan continues to be based on out of date statistics. The discrepancies between the levels of housing proposed in the Plan and the ONS household data released on 20th September 2018 are so large that the Public Examination of the Plan by the Planning Inspector must be re-opened. Consequently I object to MM2.

- I further object to MM2 because there is a similar flaw in the basis for policy S2 of the draft Local Plan by which Guildford Borough would take up Woking Borough’s so-called “unmet need” to the tune of 42 dwellings per year (some 630 dwellings in total ). Woking’s household growth between 2015 and 2034 (inclusive) is now projected by the ONS to be 2,959 households fewer than was originally projected (ie. a drop of 48%). These are huge changes which it would be unconstitutional to ignore.

Attached documents:

Comment: MM23 - LPMM18/6109  Respondent: Mr Kes Heffer 8672993  Agent:

- MM23 (policy D1). “Sustainability” is a nebulous term in planning documents, but if it means anything at all it should refer to the efficiency and compactness of developments that minimise and/or ease transport requirements and maximise the ability to walk or cycle between key locations of a neighbourhood. Policy D1 dilutes the mandate on developers to take any account of this objective; it therefore reduces rather than enhances sustainability.

- MM23. Policy paragraph 7 states that “Given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.” These two sentences comprise an oxymoron: if a site creates its own identity (ignoring the anthropomorphism associated with building sites!), it will probably not be cohesive with its neighbourhood. Whether or not it is vibrant is logically unconnected with whether it reflects locally distinct patterns of development. GBC have resorted to buzz-words to mask the paucity of their planning logic. I therefore object to MM23.

- Much of the proposed development in the draft Local Plan relies on a transport strategy focussed on increasing the capacity of the A3. That is particularly the case for Send (500 additional houses) and Three Farm Meadows at Wisley (a new town). Yet even the improvements to Junction 10 A3/M25 interchange have now been delayed by at least 2 years, and funding for further improvements to the A3 is entirely uncertain. The draft Local Plan in
its current incoherent form raises the prospect of far too many houses beyond need being built, but with the lives of the population blighted by horrendous traffic jams on an unimproved A3, and consequently on all linking minor roads. The Public Examination of the Plan by the Planning Inspector must be re-opened to sort out this disaster in waiting.

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<th>Comment: MM40 - LPMM18/6110</th>
<th>Respondent: Mr Kes Heffer 8672993</th>
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<td><strong>Specific to site A35 (Three Farm Meadows).</strong></td>
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<td>• The addition of land to the south of the appeal site does not mitigate the issue of density because development of this additional land is within a certain distance of the air traffic control beacon, often critical to Heathrow flights. This additional land is also contiguous with the Ockham Conservation area such that its development would have an entirely deleterious effect on an important historical heritage. It would also increase the visibility of the site from the Surrey Hills AONB.</td>
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<th>Comment: MM47 - LPMM18/6111</th>
<th>Respondent: Mr Kes Heffer 8672993</th>
<th>Agent:</th>
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<tr>
<td>• MM47. There is no justification for altering the boundary of the Site of Nature Conservation Interest (SNCI): the whole site qualifies as a SNCI on ecological grounds. The biodiversity of the SNCI will be destroyed by the proposed development.</td>
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<td>• In breach of case law an Appropriate Assessment and a Habitats Regulation Assessment have not been completed.</td>
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<th>Comment: MM9 - LPMM18/6107</th>
<th>Respondent: Mr Kes Heffer 8672993</th>
<th>Agent:</th>
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<tr>
<td>• MM9. I object to removal of rural villages from the Green Belt and the consequent infilling in and around those villages. The 5 purposes of the Green Belt as identified in the NPPF paragraph 80 are: 1. to check the unrestricted sprawl of large built-up areas; 2. to prevent neighbouring towns merging into one another; 3. to assist in safeguarding the countryside from encroachment; 4. to preserve the setting and special character of historic towns; and 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The development of strategic sites proposed within the Green Belt (A35, Three Farm Meadows in particular) is contrary to purposes 1, 3, 5 and, probably in the future, 2.</td>
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<td>• Taking into account all the mistakes in housing targets and flawed logic it is clear that the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist (let alone the situation prevailing in this Plan, where a clear majority of the development is proposed on land that is currently in the Green Belt).</td>
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On April 13th the Court of Justice of the European Union published its ruling in the Case C323/17 with regards to the Habitats Directive. This ruling has major implications for developments where a Habitats Regulations Assessment may be required. In order to comply with this ruling and avoid legal challenge the Guildford Local Plan needs to ensure that the HRA process will be followed in all developments to be compliant with this judgement.

Attached documents:

Comment: MM9 - LPMM18/24  Respondent: Mrs J. L Morgan 8675937  Agent:

Green Belt crucial lungs of London not just nice for residents in or near it.

Attached documents:

Comment: MM43 - LPMM18/25  Respondent: Mr Tom Brook 8678753  Agent:

In 2013 planning application 13/P/00206 regarding consideration for 30 residential dwellings on part of the same land identified in MM43/A62 in the local plan was refused as (summarised):

-Outside of any identified settlement area [ref: National Planning Policy Framework paras 87 - 89]
-encroachment into the countryside which would have a detrimental impact on the openness of the Green Belt and is against the aim of preventing urban sprawl. [ref: National Planning Policy Framework paras 79 - 80]
-30 dwellings represent a significant urban intrusion onto open and undeveloped rural land [...] harmful to the rural character of the site. [ref: Policy G5(10) of Guildford Borough Local Plan 2003]
-Conflicts with the Guildford Landscape Character Assessment 2007 to retain distinct settlements of Shalford and Chilworth.

If there was concern in 2013 about 30 houses on the same north field identified in MM43/A62 it seems unreasonable for 80 homes on the same field and expanding into the adjoining to the south east.

It would be a stretch to call this land "infilling in a village" given that it is at the extremity of the village.

It is my view that identification of this land for housing in the Borough Plan is not justified and is dubious if deemed national policy "limited infilling in villages".

Attached documents:

Comment: MM2 - LPMM18/1482  Respondent: John and Susan Burge 8686913  Agent:

1. Number of houses (MM2)

The household growth projections produced by the Office for National Statistics show that some 4,000 less households will be needed than in the current plan. I OBJECT to the continued use of outdated information and must press GBC to reconsider the need for several of their strategic sites.
Comment: MM3 - LPMM18/1483  Respondent: John and Susan Burge 8686913  Agent:

2. Policy S3 on the Town Centre (MM3)

The town centre of Guildford to the north of North Street continues to be an eyesore. This should be made available immediately for new housing. I OBJECT to the continued prevarication about the development of this site.

Attached documents:

Comment: MM40 - LPMM18/1486  Respondent: John and Susan Burge 8686913  Agent:

4. Site Specific A35

The inclusion of Three Farms Meadow/Wisley Airfield in the latest plan makes a mockery of the rejection of the site by both the Planning Inspector and the Secretary of State. I OBJECT to its inclusion in the Local Plan

Attached documents:

Comment: MM9 - LPMM18/1485  Respondent: John and Susan Burge 8686913  Agent:

3. Policy P2 Green Belt (MM9)

I strongly OBJECT to the proposal to remove from Green Belt protection several villages in the borough.

Attached documents:

Comment: MM1 - LPMM18/1349  Respondent: Sir Michael Aaronson 8687041  Agent:

I welcome the strong statement in Reasoned Justification para 4.1.4” that the "presumption in favour of sustainable development...will not automatically apply to habitats sites (including sites protected under the Birds and Habitats Directives), designated Sites of Special Scientific Interest (SSSIs), development requiring appropriate assessment because of its potential impact on a habitats site [including new residential development within 5 km of the THBSPA], land designated as Green Belt, or Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets, or locations identified as at risk of flooding.

I would simply point out that all bar one of these caveats apply to the site identified under Policy A64, which is within 5 km of the THBSPA, is adjacent to an SNCI and potentially merits this status itself, is in red-rated Green Belt land, is adjacent to and would have an adverse visual effect on the Surrey Hills AONB, and finally is in a location at risk of
flooding. Given all these factors I find it astonishing that this site has been included as a Main Modification when this is so much at odds with Policy S2 and I OBJECT to this lack of consistency.

Attached documents:

Comment: MM2 - LPMM18/1350 Respondent: Sir Michael Aaronson 8687041 Agent:

I strongly OBJECT to the continued use by GBC of a housing requirement of 630+42 dwellings per annum, when the latest ONS figures for projected household formation in the Borough show this number to be inflated - according to some expert opinion by as much as 75%. I understand that GBC will want to build in some margin of error, but a margin of 75% is disproportionate, and given that the cost of this exaggeration involves the permanent destruction of Green Belt landscape and habitat it is quite unacceptable.

I request that the Examination in Public of the Local Plan be re-opened so that the Inspector may have the opportunity to reconsider the Plan in the light of these new projections, which have appeared since the previous EiP was conducted in June.

Furthermore I do not accept that it is reasonable or just to require Guildford to build on its Green Belt to take up the shortfall in Woking's projection when (a) Woking itself is not building on Green Belt and (b) Woking's housing need figure has also been reduced but this has not been re-assessed but at an EiP.

I OBJECT to the statement in Reasoned Justification 4.1.10 "National policy states that where possible the deficit accrued since the start of the plan period should be met within the first five years. Given the step change in housing requirement compared to past delivery rates which have been constrained by Green Belt policy [my emphasis], the accrued backlog at the date of adoption is significant." To blame the backlog of housing delivery in Guildford on Green Belt policy is disingenuous, to say the least. There are no doubt many reasons for this failure, including most notably the failure of a developer-driven housing supply to deliver homes that meet the needs of the Borough’s people. GBC should be taking advantage of the newly-conferred powers it has to borrow money to fund social housing to address the backlog of housing requirement, rather than using specious claims about the Green Belt to justify eroding it in this Local Plan.

Attached documents:

Comment: MM3 - LPMM18/1352 Respondent: Sir Michael Aaronson 8687041 Agent:

I WELCOME this new Policy S3, which pays long overdue attention to the importance of Guildford Town Centre in meeting the housing needs of the Borough. I note the statement in “Reasoned Justification 4.1.21" that "The delivery of housing in the town centre adds to its vitality and vibrancy...the town centre also represents the most sustainable location for new higher density housing. Whilst the Local Plan provides for sufficient sites to meet housing needs over the plan period, as part of regeneration efforts, more housing is likely to come forward over the plan period. [My emphasis.] Given this acknowledgement, it is disappointing that GBC has not set itself more ambitious targets for housing development in the Town Centre, but has instead fallen back on taking more land out of the Green Belt. Under the section "Monitoring Indicators" there is an indicator "The number of new homes completed each year in the town centre", but the "Target" is "N/A"! That doesn't sound like a very serious target, and I would request that one be included in the final version of the Local Plan.

Attached documents:
I wish to OBJECT to the inclusion of this site as a Main Modification to the Submitted Local Plan, on three counts:

1. GBC has not demonstrated the “exceptional circumstances” that would justify redrawing the Green Belt boundary in this area.
2. Development on this site would have severe adverse implications for the communities of Flexford and Normandy, which have not been addressed in the proposal.
3. This site is highly unlikely to contribute to the early delivery of housing, which is the sole rationale for its inclusion as a Main Modification.

Lack of “Exceptional Circumstances”

As I have argued in my comments on MM2, Policy S1, the latest version of the Local Plan needs re-examination in the light of the latest household formation figures issued by the ONS in September. These indicate that the housing number of 630+42 underpinning the Plan is greatly exaggerated. This radically undermines any justification to use the argument of “exceptional circumstances” to take this site out of the Green Belt.

Furthermore the A64 proposal fails to do justice to the extreme sensitivity in Green Belt terms of this particular location, which acts as part of the buffer between the settlements of Flexford and Normandy and makes a substantial contribution to the openness of the Green Belt in this area. Building on this site would increase the size of Normandy by 7% and would open the floodgates to further urbanisation north of Flexford and south of Normandy.

The site is proposed as a ‘Village Extension’ into the Green Belt, redrawing the boundary of the Flexford settlement and relocating it to the north of the railway line that currently contains it. At present all the land between Flexford (to the south of Normandy Parish) and Normandy (to the north) is classified as Green Belt. Previous applications for planning permission on land to the east of Glaziers Lane have stressed the damage that would be done to the openness of the Green Belt if development were permitted here. Ironically these include two unsuccessful applications for development on part of what is now site A64 (16/P/01452 and 17/P01413). These are for substantially smaller developments than the one that is now proposed: for 42 and 9 homes respectively.

Planning Officers have also drawn a distinction between block-style development such as characterises the settlement of Flexford and the linear development that characterises Glaziers Lane and most of the settlement of Normandy. A dense development of 105 houses on A64 would sweep aside this distinction and introduce inappropriate development into a presently open area. Furthermore this would be the thin end of a much longer wedge: once A64 had been developed it would strengthen the hand of the developer seeking to build on the southern part of the now abandoned site A46 (also north of Flexford over the railway line, but to the west of Glaziers Lane), plus that of other developers seeking to build further north on, and to the rear of, Glaziers Lane. In other words, taking A64 out of the Green Belt would presage the end of Normandy and Flexford as two separate settlements with open space in between, and would kick start the effective urbanisation of the whole area.

I therefore OBJECT in the strongest possible terms to the over-riding of Green Belt sensitivity in the absence of any “exceptional circumstances” that would justify this.

Adverse implications for the local community.

The rationale for the inclusion of A64 contained in the ‘Sustainability Appraisal’ prepared by a firm of private consultants, AECOM, makes clear that the site is on ‘red rated’ Green Belt land, but argues for its inclusion largely on the basis of its proximity to Wanborough Railway Station. However it admits that of all the sites proposed for additional growth in this latest version of the Plan Flexford is the smallest and most rural: “There are no existing facilities in Flexford and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality in this way.” (Section 9.14.1) Although it claims that Flexford benefits from access to the local primary school (which is, however, right at the other end of the Parish) and the GP surgery in Glaziers Lane it is silent on the issue of access to secondary education and admits that no assessment has been made of the capacity of the GP Surgery to accommodate this number of extra patients.
In addition to the above considerations there are major concerns with regard to the impact of an additional 105 houses on the already overburdened road and sewerage infrastructure in Normandy:

- Glaziers Lane is a notoriously busy road and the Officers’ Reports on the two unsuccessful previous applications for this site both drew attention to the dangers inherent in locating the access point to this site no more than 150 metres to the north of the blind summit railway bridge at Wanborough Station.

- In addition the Plan envisages 35 houses a year being built in three consecutive years from 2020; the impact of this level of construction traffic in Glaziers Lane and the surrounding area will be considerable. The road leading up to the south side of the railway bridge is increasingly suffering from subsidence where it joins the bridge, and this would be exacerbated by an increase in heavy traffic.

- The sewerage system in Glaziers Lane is already at maximum capacity. Many houses have had to have non-return valves fitted to stop sewage back-up. The existing infrastructure will not support an additional 105 houses.

It is noteworthy that no additional infrastructure improvements have been incorporated into the Main Modifications version of the Plan to reflect a 7% increase in the number of dwellings in the Parish – indeed given the constraints it is hard to see what such improvements might consist of. It is not sufficient to claim that these would be addressed at planning application stage; as a matter of principle the site should not be taken out of the Green Belt unless realistic infrastructure plans are in place.

In short, the A64 site has no merit in terms of benefit to the local community but has many serious drawbacks that have not been addressed by the ‘Main Modifications’ proposal. It puts long term strain on the community without offering any countervailing benefit.

I therefore OBJECT to Policy A64 on the grounds that its harmful consequences for the local community have not been addressed.

**Failure to secure early delivery of housing.**

This site did not feature in any of the previous versions of the Local Plan that have gone out for public consultation. It was included in the October 2013 ‘Strategy and Sites Issues and Options’ paper as one of the many sites under consideration across the Borough, but was subsequently discarded. Its reappearance in 2018 was therefore a complete surprise and there are good reasons to believe that its inclusion was misjudged because it will not achieve the early delivery of housing called for by the Inspector - the sole rationale for its inclusion at this late stage. There are a number of concerns about its viability, as follows:

- The site is not in single ownership and there is good reason to believe that not all of it is available for development. The prospective developer should be challenged to demonstrate that he has control of the site and can guarantee early delivery of 105 houses. In particular he should be asked what his plans are for the deep artificial fishing lake that currently occupies roughly one third of the site.

- The lake and its margins also constitute an important wild life habitat. The site is within 100 metres of the SNCI at Little Flexford (the now discarded Site A47). The latter is home to Great Crested Newts, a protected species; they are also a migrant species and it is highly possible that they have colonised site A64. At the very least a detailed wildlife and habitat appraisal would need to be carried out before this site could be given the go-ahead for development.

- The Sustainability Appraisal makes clear that “there is a degree of surface water flood risk at the site’s eastern extent” (page 63 of the SA). This would be exacerbated if the artificial lake were partly or completely filled in for development.

- The site is bisected by a public footpath that goes on to cross the railway line on an uncontrolled, pedestrian-operated, crossing; significant work would have to be undertaken by Network Rail before the site could be considered safe for a major housing development.

- The site abuts onto the Strawberry Farm waste management site, where building waste is brought in from building sites and processed, crushing the bricks and concrete, screening out the soil for resale. Green waste from tree surgeons and others is also processed on the site. There is a 30+ metre high pile of material within 25 metres of the rear boundary of
this site; it is likely there is also historic industrial and organic materials contamination. The environmental health implications would need to be addressed, possibly involving some restriction of current waste management activity, before development could go ahead.

- Building at high density on this site will have an adverse effect on the Surrey Hills AONB. In order to deliver the number of houses required, and given the existence of the lake covering roughly one third of the site, it might realistically be necessary to build 3 or even 4 storeys high. Not only would this be completely out of keeping with the rest of Normandy/Flexford (there is currently nothing of comparable size in the area) it would also be visible from the Hog’s Back in the AONB and would introduce a new and discordant element to the landscape. There is also about to be a review of the boundary of the AONB that will include the Area of Great Landscape Value to which this site is very close; if the boundary is moved this will impose further constraints on development in the area.

- I have already mentioned the fragile state of the road and sewerage infrastructure in Glaziers Lane, and the severe impact that three years of construction traffic leading to 105 extra houses would create. It is highly unlikely that these issues could be addressed in time to allow the required number of houses to be built within the 5 year period.

Most of the above points have been made by Planning Officers in their rejection of the previous planning applications for a part of this site (16/P/01452 and 17/P01413). It appears that these points have been overlooked in the present proposal.

For all these reasons I submit that Policy A64 will fail to deliver the early years housing that is the sole justification for its inclusion, and I therefore OBJECT to its being a Main Modification to the Local Plan.

Attached documents:

Comment: MM9 - LPMM18/1353  Respondent: Sir Michael Aaronson 8687041  Agent:

The welcome commitment in Policy P2 to continue to protect the Metropolitan Green Belt sits ill alongside the fact that almost all of the additional uptake of housing in the first five years of the Local Plan called for by the Inspector is to be met under the Main Modifications by additional building on the Green Belt. This casts into doubt the sincerity of the intention behind the Policy. This doubt is reinforced by the statements in new para 2 c, under ”Limited infilling”. Para 2 c ii contains the statement ”Limited infilling may also be appropriate outside the inset settlement boundaries, as designated on the Policies Map, of the following villages where it can be demonstrated that the site should be considered to be within the village.” These villages include Flexford and Normandy. I OBJECT strongly to this provision; either a settlement boundary means something or it does not. I am not reassured by the new statement in ”Reasoned Justification 4.3.25” to the effect that: ”There are a number of considerations to take account of when assessing whether a site is located within the village.” This reads too much like a loophole that will be exploited by unscrupulous developers and which will lead to the gradual erosion of the open spaces between distinct settlements - in this case between Flexford and Normandy.

Attached documents:

Comment: MM2 - LPMM18/1998  Respondent: N J Axten 8703585  Agent:

I would like to request that the Public Examination of the Guildford Local Plan should be reopened on the following grounds:

1. (MM2) The ONS latest projection for new households required within the Guildford area is 40% lower than the figure upon which the Local Plan is presently formulated.
<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/1999</th>
<th>Respondent: N J Axten 8703585</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. (MM9) Policy P2: Green Belt. Guildford Borough Council has failed to adequately address the option for brownfield development within the town before proposing Green Belt development, including the prioritisation of residential property over commercial and retail development. 'Exceptional Circumstances' have not been met for Green Belt development. The current Local Plan has not been fully thought through and its content is based upon flawed information. It should not be allowed to proceed.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM51 - LPMM18/5169</th>
<th>Respondent: Frances King 8708289</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I wish to voice my approval of the modification Amendment 1: Horsleys - West Horsley (South) (MM51) to the defensible property boundary to the west of Silkmore Lane, referred to as the “Original Green Belt Boundary”. I object strongly to any suggestion that it should be amended back to the “Amended Green Belt Boundary”, which is indefensible.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM45 - LPMM18/243</th>
<th>Respondent: Richard Cunningham 8708897</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>The addition of this modification goes against the soundness of the Local Plan, in that it is not justified.</td>
<td></td>
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</tr>
</tbody>
</table>

- The site is within the Green Belt - no exceptional circumstances for the revision of the Green Belt boundary or its development have been given. It would lead to the urbanisation of Flexford & Normandy, two distinct villages.
- There are no proposed improvements to infrastructure to accompany the modification - the area is prone to flooding; the sewerage system is already at capacity in wet weather; Glaziers Lane to which the site enters, is a D class road and was not intended for higher traffic density.
- There are no facilities in Flexford, with the exception of Wanborough railway station - this development will not contribute towards the sustainability and vitality of the village, as indicated in the Sustainability Appraisal.
- There is no community (Normandy & Flexford) benefit from this modification.
- More consideration should be given to building on existing brownfield sites rather than on Green Belt land. |

<table>
<thead>
<tr>
<th>Comment: MM13 - LPMM18/4774</th>
<th>Respondent: Rosmarie Roberts-Kunz 8711841</th>
<th>Agent:</th>
</tr>
</thead>
</table>
The projected need for retail space is inflated and should be cut by, say, 30% to make room for urban homes. The projections presented might have seemed credible five years ago but ignore how high streets have evolved since then, with shop bankruptcies, the rise of online shopping etc.

Attached documents:

Comment: MM2 - LPMM18/4770  Respondent: Rosmarie Roberts-Kunz 8711841  Agent:

Consultation response: Guildford Local Plan: Strategy and Sites - Main Modifications 2018

MM2

I object to identifying the HMA with the tri-borough area of Woking/Guildford/Waverley. This is an arbitrary invention of the SHMA and has never been justified by any reference to an actual housing market catchment in the real world. The need to include Woking’s unmet housing need is therefore artificial.

The OAN has not been based on “the latest 2018-based population projections.” September 2018 figures suggest 301dpa, or just over 5,700 for the plan period. Greenfield development in the Green Belt is unnecessary to meet the OAN, especially as new Policy S3 now requires urban brownfield be given priority. No “exceptional circumstances”, as required by the NPPF, have been advanced for any Green Belt development or for “inserting” most of the borough’s villages.

To meet this reduced OAN, the balance of urban development should be shifted from the retail sector towards building homes, in line with government policy, uplifting the Guildford Town Centre figure. Promoting building in the Green Belt will only disincentivise developers from tackling the regeneration of central Guildford, and is in conflict with Policy S3.

Whatever the OAN methodology, the OAN needs to be objective, based on the best and latest evidence. The plan must be adapted in line with the new facts.

Attached documents:

Comment: MM23 - LPMM18/4775  Respondent: Rosmarie Roberts-Kunz 8711841  Agent:

MM23

The changes to Policy D1 water down the social component of sustainable development set out in national policy. Wording on walking distances and cycle routes and on large developments of over 25 units have been deleted and replaced with vaguer text that gives a freer hand to developers to get away with socially unsustainable building.

The deletion of Policy D4 is not justified as it met the soundness test.

Attached documents:

Comment: MM3 - LPMM18/4771  Respondent: Rosmarie Roberts-Kunz 8711841  Agent:
MM3

Policy S3 needs to be strengthened. Most local people want to live in the Guildford urban area. Urban regeneration, not car-dependent Green Belt housing estates, should be the plan’s flagship policy. This would be more consistent with national policy and GBC’s spacial strategy.

The current wording evades several major issues and is too open to loose interpretation in years to come. It needs explicitly to prioritise residential over retail (see above). It needs to make plain that the town’s character, including “important views”, can only be protected with a presumption that height will be limited (depending on exact location) to about 4-6 storeys. It needs to make more explicit the link between giving “priority for pedestrians and cyclists over motor vehicles” and more realistic, higher housing densities that incentivise walking and cycling, rather than low-rise, suburban-type homes in the town centre with gardens and garages. All this is do-able without compromising character, as London has shown. It also needs to highlight the important role town-centre development can have in kick-starting and front-loading the whole plan, boosting housing numbers in the early years as government policy requires, leveraging GBC’s comparative advantage (relative to greenfield development) as an urban landlord.

Attached documents:

Comment: MM7 - LPMM18/4772  Respondent: Rosmarie Roberts-Kunz 8711841  Agent:

MM7

The viability exception (2) is open to abuse by developers and should be deleted to protect the countryside.

Attached documents:

Comment: MM9 - LPMM18/4773  Respondent: Rosmarie Roberts-Kunz 8711841  Agent:

MM9

Development in the Green Belt should be restricted in accordance with the NPPF. Instead, this policy appears to be to seek out and widen loopholes in Green Belt protections beyond the “exceptional circumstances” set out in the NPPF.

The wording of MM9 is muddled, adding to the risk of challengeable interpretations of national policy about what development should be allowed.

MM9 (1), for instance, is impossible to follow. Under “limited infilling”, (2)c(i)-(iii) I suggest deleting “should be considered to be” by “is” in each case. Many villages are diffuse or irregularly shaped, so any scope for confusion about what is “within the village” needs to be restricted.

Most seriously, MM9 omits any support for the Green Belt, even though the latter covers 81% of the borough. By “insetting” most of the borough’s villages, extending settlement boundaries, removing SNCI protections and prioritising greenfield housing estates over urban regeneration the plan is widely criticised as an attack on the countryside. MM9 fails to strike the same balance between protection and development as the NPPF. Along with the maps at Appendix H it appears to be pre-determined in favour of future development and should be cut from the plan.

Attached documents:
Comment: MM51 - LPMM18/3882  Respondent: John Sansom 8715777  Agent:

Please register my firm approval of this modification.

No more dwellings of any sort should be built in this area—preservation of country walks, presence of wild Life (deer, pheasants, foxes, etc.) is essential current & future generations. Poor drainage, lack of adequate roads, & general facilities is a further negative—in fact extension of this area.

To Ripley Lane might be considered,

Attached documents:

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Comment: MM11 - LPMM18/5341  Respondent: Helen Jefferies 8717921  Agent:

MM11

4.3.34a Why should development which may compromise the separate identities of Ash and Tongham “be strongly resisted”? The treatment should be no different to the effective merger of, for example Ockham and Ripley or Ockham and West Horsley. This should apply to all villages or none. Selective policies which favour some wards over others are inappropriate and unsound.

Attached documents:

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Comment: MM12 - LPMM18/5342  Respondent: Helen Jefferies 8717921  Agent:

MM12

It is clear that the Council has relied on out of date guidance from Natural England which does not take into account the latest legal position.

4.3.50c Does not take current case law into account. Further there is no reference to “adverse effects on integrity” other than recreational pressure when clearly, nitrogen deposition and air pollution are potentially of greater impact and are also incapable of being mitigated.

4.3.54 The latest NE visitor surveys do not support this assertion.

Attached documents:

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Comment: MM14 - LPMM18/5343  Respondent: Helen Jefferies 8717921  Agent:

MM14

(2) Does the 500m from a public transport interchange limitation apply and if not why not?

Attached documents:
Comment: MM15 - LPMM18/5344  Respondent: Helen Jefferies 8717921  Agent:

MM15

Object

(b) What is the justification from removing Guildford Town Centre employment core?

Attached documents:

Comment: MM2 - LPMM18/5336  Respondent: Helen Jefferies 8717921  Agent:

A general comment that documents should be referred to the current version with a document name and version number or date, otherwise it is impossible to know what is going on.

MM2

Object

1. does not refer to the use of “current” ONS statistics

4.19(a) mentions the latest 2018 ONS population projections but expressly fails to mention the other relevant ONS statistics such as household projections. This should not be a “pick the stats that suit the argument” operation.

4.1.9(ab) this excludes current/permission associated with allocation and does not include small site so is a significant underestimate of the supply

4.1.11 or the latest IDP. There is no evidence that up to date information is used for example on the delay to the J10 RIS scheme. This is a perfect example of why the plan needs to have a list of current documents which are referenced and updated as new information/evidence becomes available. The reliance on out of date, publicly-available strategic highways information renders the plan unsound see reference to site A35 below.

Attached documents:

Comment: MM23 - LPMM18/5348  Respondent: Helen Jefferies 8717921  Agent:

MM23

Object

Object to the deletion of this policy (character and design of new development).

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

MM23

Object
(7) Strategic sites should also reflect local development

(8) Include Safe pedestrian and cycle movement.

(20) Again Ash & Tongham should be treated the same as elsewhere

4.5 8e-8j FTTP in the remainder of the borough should also be the default as this would allow more people to work from home reducing congestion on both roads and public transport.

Attached documents:

---

Comment: MM25  LPMM18/5346  Respondent: Helen Jefferies 8717921  Agent:

MM25

Object

(2) Leave as it is without current changes

Attached documents:

---

Comment: MM26  LPMM18/5349  Respondent: Helen Jefferies 8717921  Agent:

MM26

Object

5a-8 Developers will “bed and breakfast” sites to raise purchase values and ensure that sites are “unviable”

Attached documents:

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Comment: MM27  LPMM18/5351  Respondent: Helen Jefferies 8717921  Agent:

MM27

(2) There is no definition of material therefore the policy is meaningless.

4.6.18a This is even considering that small sites are not included in the plan. Transport modelling must include traffic from all sites not just allocated sites.

There is no evidence to show that the delay in the delivery of J10RIS has been taken into account or indeed its’ impact on A35 and other sited which rely on it.

The incompetence of the Council and Surrey County Council to accurately model traffic was shown up very clearly at the Appeal into the Planning application on the former Wisley airfield. Unfortunately, it would appear that the councils rely on developer data and either do not have the skills to understand the model or collude with the developers to agree completely inaccurate figures.

263 of 2554
(2) It would appear that the tracked changes version does not accurately reflect what has been changed.

5c/5d What are the historic vies that need protecting? Is there a list or will this just provide room for further argument between stakeholders?
6d What is a legible route?

4.1.2.1 Reference to minimisation of car parking should include a limit on “on street” parking as “consideration should also be given” is both ineffectual and unenforceable.

4.1.24 Rights of way rather than right of ways.

Object I object to the change so that LA pay for the pitches. The developer should be made to pay. This is about trying to make the site acceptable because of the benefit it brings – if the LA has to pay there may be many more important and more deserving things for the LA to finance in it’s limited social care budget for example.

Object
(6) What is “permeability” for pedestrians and cyclists? It makes no sense.

Object

(6) What is “permeability” for pedestrians and cyclists? It makes no sense.

Attached documents:

Object I object to additional green belt release for an access road which will become a rat run.

Attached documents:

Object No need for additional sites particularly those in the green belt.

Object No need for additional sites particularly those in the green belt.

A61 Mitigation measures likely to be in contravention of current case law due to impact on Wealden Heath SPA. There is additional unwarranted impact on the AGLV

Attached documents:

Object I strongly object to the change in the SNCI boundary.

Object I strongly object to the change in the SNCI boundary.

(3) Track changes do not appear to accurately reflect the previous wording

(23) This is a rural site in the countryside where “the highest standard of URBAN design are not appropriate”.

Object I strongly object to the change in the SNCI boundary.
Comment: MM41 - LPMM18/5357  Respondent: Helen Jefferies 8717921  Agent:

MM39-45
Object No need for additional sites particularly those in the green belt.

MM41
(1) I object to the increased number of homes
(Oa) I object. This proposal is too dangerous.
(Ob) I object due to the disruption to other residents
(Oc) I object because I do not understand the meaning of this phrase

Comment: MM42 - LPMM18/5373  Respondent: Helen Jefferies 8717921  Agent:

MM39-45
Object No need for additional sites particularly those in the green belt.

(1) I object to the increased number of homes
(Oa) I object. This proposal is too dangerous.
(Ob) I object due to the disruption to other residents
(Oc) I object because I do not understand the meaning of this phrase

MM42
(Oa) I object see OA above

Comment: MM43 - LPMM18/5375  Respondent: Helen Jefferies 8717921  Agent:

MM39-45
Object No need for additional sites particularly those in the green belt.
MM43
Object I object to the impact on the AONB/AGLV

Attached documents:

Comment: MM44 - LPMM18/5361  Respondent: Helen Jefferies 8717921  Agent:

MM39-45
Object No need for additional sites particularly those in the green belt.
MM44 I object to the change in the green belt boundary in Send Marsh.
MM44 Object I object to the unnecessary use of green belt land particularly as this has not been properly assessed.

Attached documents:

Comment: MM45 - LPMM18/5377  Respondent: Helen Jefferies 8717921  Agent:

MM39-45
Object No need for additional sites particularly those in the green belt.

MM45
Object I object to the unnecessary use of green belt land particularly as this has not been properly assessed.
MM45 I object to the change in the green belt boundary in Normandy and Flexford

Attached documents:

Comment: MM46 - LPMM18/6134  Respondent: Helen Jefferies 8717921  Agent:

Appendix 0
Object FWA housing trajectory is inconsistent with the HE revised timescale for J10 which is now planned to commence when it was previously planned to be completed (ie 18-24 months late) with NO FIXED COMPLETION DATE. Further this scheme is now linked to the M25 smart motorway scheme for J10-J16 which will delay further.

Attached documents:

Comment: MM48 - LPMM18/6133  Respondent: Helen Jefferies 8717921  Agent:
Appendix C

LRN 26 – A47 improvement????

Attached documents:

Comment: MM5  -  LPMM18/5338  Respondent: Helen Jefferies 8717921  Agent:

**MM5**

4.2.23 What about later versions of the TAA? There would appear to be an inconsistent use of the evidence base see opening comment.

Attached documents:

Comment: MM50  -  LPMM18/5380  Respondent: Helen Jefferies 8717921  Agent:

**MM50** The whole site should remain a SNCI and the removal of this designation for the whole area is not justified. This action makes a mockery of the whole of the council’s strategy for increasing biodiversity rendering it meaningless. The appropriate statutory body has not been consulted.

Attached documents:

Comment: MM51  -  LPMM18/5381  Respondent: Helen Jefferies 8717921  Agent:

**MM51** I object to the change in the green belt boundary In West Horsley. I also object to the fact that the erratum notice only refers to the main document and not main modifications so is extremely confusing. For clarity, I object to removing green belt in this location.

Addendum to the HRA date 6th September

This document refers to the June 2018 HRA which was established at the EIP by James Burton of counsel, representing the Wisley Action Group to be “in name only” in that the words had been changed but the assessment had not been done. The reference to policy S2 mentions traffic from the Local Plan development but there is no evidence to show that the increased traffic as a result of the J10 improvements have been properly taken into account. The increase in housing proposed at Garlicks Arch, Aldertons and Burnt Common will further increase traffic in Ripley High Street and the impact of this coupled with the impact of the current preferred route for the 1.4 million cars attributed to the RHS have also not been properly accounted for. Any slips at Burnt Common do NOT mitigate these issues, despite assurances from developers. The traffic model is NOT FIT FOR PURPOSE.

The only reference to maintaining the integrity of the TBHSPA is recreational pressure whereas in fact pollution NOX, NO2 and nitrogen deposition pose equally significant threats.
There is no evidence to show that the in-combination effects of traffic and recreational use on the TBHSPA has been considered in combination with developments in Woking and/or Surrey Heath yet bizarrely the cumulative impact on the Wealden Heath SPA has been considered despite being in Waverley.

It is simply not credible that limited infilling in some villages has no HRA implications particularly as some of these are within the TBHSPA zone of influence.

Policy P5 is inconsistent with current case law. Para 4 appears to predetermine as drafted as there appears to be no room for the council or NE to disagree and therefore disallow development which will impact the TBHSPA. Additionally, para 4.3.50c appears to predetermine the outcome of appropriate assessments before they have even taken place – it is unclear whether the avoidance strategy is compliant with case law.

In summary, the proposed modifications do not in my opinion render the plan sound. The opposite occurs and they provide further evidence of the council and the inspector using a greenfield first, town centre last policy, in contravention of policy that requires that the opposite occurs.

I support re-opening of the examination in public to address some of these issues including importantly the use of up to date ONS statistics for household formation.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM6 - LPMM18/5339</th>
<th>Respondent: Helen Jefferies 8717921</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MM6</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2a /2b Why should the urban area be treated differently from the rural areas? The threshold should be 5 throughout the borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Again refers to a document which should subsequently be updated.</td>
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</tbody>
</table>

| **MM6**                     |                                       |        |
| 4.2.42 Poor drafting 0.5 affordable homes round up and 0.4 affordable home round down – what happens between 0.4 and 0.5 or is that a subjective discussion between officers and developers at the time? |       |

| **MM7**                     |                                       |        |
| 4.2.49 [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] Local needs defining to avoid argument later. |       |

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/5340</th>
<th>Respondent: Helen Jefferies 8717921</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MM9</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3c(i) Object to limited infilling outside the identified settlement boundaries.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
(ii) Object to limited infilling inside the inset settlement boundaries

(iii) object to limited infilling “considered to be” within the village.

4.3.25 Object – see response to 3c above

Attached documents:

Comment: MM44 - LPMM18/4406  Respondent: Michael Derrick 8724993  Agent:

MM44 Land at Alderton’s Farm policy A63

This is a green belt area and the proposed 120 homes can not surely be justified. It clearly contradicts policy MM9. The additional traffic will put increased pressure on all the Send roads including the crossroad close to a school.

Attached documents:

Comment: MM9 - LPMM18/4400  Respondent: Michael Derrick 8724993  Agent:

Objections to MM9 Green Belt Policy

The proposals ‘modifications’ clearly do not protect the Green Belt. I object to the proposed number of residential dwellings and industrial sites. This does not surely qualify as ‘limited infilling outside of settlement boundaries’. This is open to misinterpretation and is clearly being taken advantage by developers at the expense of those of us who live in Send.

Attached documents:

Comment: MM51 - LPMM18/1249  Respondent: Emma Pernet 8727105  Agent:

I am writing to confirm my approval to Amendment 1: Horsley (West Horsley) (MM51)

Attached documents:

Comment: MM41 - LPMM18/536  Respondent: Mr Chris Payne 8727425  Agent:

Object to the proposed increase in number of houses to 550 - this is excessive for the site and overdevelops the area and infrastructure. The ancient woodland contained within this site makes it unsuitable for this scale of development and should be preserved as per national guidelines. This land acts as a buffer between Send and Ripley and in combination with MM44 will effectively join the 2 villages.
Object to the doubling of size of this proposal with no obvious need as capacity exists at existing sites (eg Slyfield). No special circumstances have been established hence it contradicts MM9. The supporting roads will not be able to accommodate the size/type/number of additional commercial vehicles this type of development would generate. The increase in local pollution levels from predominantly diesel vehicles has not been assessed and taken into account - especially important given the proximity of local residents and schools.

Object due to over development of green belt land. In combination with other developments in the Send area (esp MM42 and MM41) will lead to unacceptable increase in traffic and pollution. Infrastructure at present cannot cope with traffic heading from A3 to Woking via Old Woking at peak times. This is inappropriate development on land which is important for the character of the area and is to close to the the wildlife reserves at Papercourt lake. The case for 'very special circumstances' to develop greenbelt land as outlined in the NPPF framework has NOT been met. This land was previously consulted on and was removed from the local plan for the above reasons. Its inappropriate to keep submitting the same site - the same reasons for exclusion exist now as then and ALL previous objections should be valid again.

This site is not required due to the ONS revised housing need requirements which have NOT been used to assess future needs. The fact the developer has pushed this site as one to be developed in the 1-5 year time frame does NOT qualify as special circumstances hence it should be removed as previously agreed.

The Ministry for Housing, Communities and Local Government (MHCLG) emphasised that councils should prioritise brownfield sites for redevelopment and green belt land should be preserved and protected 'at all costs'. The SCC has not explored all possibilities of brownfield development and is not following the MHCLG guidance (Mar 2018).

This site is the source of frequent flooding after heavy rain and is not suitable for development.
MM37 – Compton Parish Council objects to the addition of Policy A26A (Blackwell Farm Access Road) within the Local Plan for the following reasons:

○ In written and oral evidence to the Examination, not a single party advocated the use in any way of the existing Down Place access road for the new access road to Blackwell Farm. This was because, self-evidently, it is too narrow and steep for the purpose, and is bounded on both sides by trees which should not be removed for road-widening because they contribute greatly to the landscape and have historic interest. Proposals did suggest crossing this access road at some point, but were otherwise presented as solutions that specifically avoided damage to the existing Down Place. It is therefore inappropriate now to include the option of using Down Place in some way. The proposed Main Modification Policy A26a Requirement 2 should therefore be reworded to read: “The access road will be a new road which avoids the line of the existing Down Place and its associated tree belts.”

○ The revised land allocation for the link road between Blackwell Farm and the A31, shown in the mapped part of proposed Main Modification in new Policy A26a, is substantially different from the options presented in writing and orally to the Examination. It goes well beyond the change which the Inspector would have anticipated from the submissions made. In particular there is no justification for a land allocation for the road on the north-east side of Down Place on the steeply-rising ground on the A31 side of the sharp bend in Down Place (ie above the 120m AOD contour). There were no proposals considered at the Examination which would have involved road building in this area, or a junction with the A31 taking land north-east of Down Place. The allocated area of search for the new road on the principal slope should be amended so that it is confined to land south west of Down Place, and additionally be set back from Down Place to avoid damage to the tree belt alongside this road.

MM37 – Compton Parish Council objects to the inclusion of policy A26a (access road to the Blackwell Farm development site) as a separate policy to the Policy A26 (the Blackwell Farm allocation). The separation should not be allowed to proceed because:

○ The submitted Plan is clear that the Blackwell Farm development cannot proceed without the link road, so the two parts of the scheme are completely linked and separation is entirely unnecessary: if a solution to the link road problem cannot be found, then Blackwell Farm itself cannot be developed;
○ The proposed separation was not raised, by any mechanism, as a matter for discussion at the Local Plan Examination: there is no authority for it from the Inspector;
○ The separation would give the impression that the Blackwell Farm development was entirely outside the Area of Outstanding Natural Beauty, whereas it is 100% dependent on the link road through the AONB;
○ By separating off the link road, the Plan would enable significant parts of the development to proceed without that element of the package: that was not what the submitted Plan proposed.

We doubt that it was the intention of the Council or the Inspector that Policy A26a should be separated from Policy A26, and this should be clarified by including in Policy A26 in Requirement 1, after the insertion of the Main Modification “see Policy A26a”, but within the brackets, the words “which shall be treated as an integral part of Policy A26”. This clarification would deal with our objections.
MM36 - Compton Parish Council objects to the following modification within Policy A26:

- The increase in employment space on the Surrey Research Park in Allocation paragraph 3 from 30,000m² to 35,000m². Whilst the PC welcomes densification of development in the right areas, any increase in office space at this particular location would attract additional traffic and put pressure on a junction that would already be over capacity.

MM36 - Compton Parish Council welcomes the new ‘Opportunities’ item (4) in the Main Modifications to Policy A26.

Attached documents:

Comment: MM2 - LPMM18/1641  Respondent: Lisa Wright 8729313  Agent:

Having read the new data from Neil McDonald ref MM2/housing figures, please reopen the consultation to discuss these figures in detail.

It seems that we do not need any housing on Greenbelt sites and should remove the strategic sites in favour of town regeneration.

Attached documents:

Comment: MM37 - LPMM18/1107  Respondent: Lisa Wright 8729313  Agent:

On point A26a. AONB land should not be used for development. It has been given AONB protection for a reason. Within the Local Plan I understand land can be taken out of the Greenbelt but this is not the case with AONB. AONB Protection stands and should be respected.

Attached documents:

Comment: MM9 - LPMM18/1106  Respondent: Lisa Wright 8729313  Agent:

I object to further Green Belt sites being allocated in the Local Plan. There is far too much land in the town centre that is being wasted and should be regenerated to provide homes for our youngsters.

Attached documents:

Comment: MM41 - LPMM18/3386  Respondent: Peter Anderson 8729441  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM2 - LPMM18/3783  Respondent: Ian Slater 8731649  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2.1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2.2. There is too much reliance on A3 improvements and these are beyond the council’s control
   2.3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   2.4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   3.1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3.2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247
I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for
traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.

4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**
MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/3793  Respondent: Ian Slater 8731649  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/3784  Respondent: Ian Slater 8731649  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

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**Comment:** MM31 - LPMM18/3787  **Respondent:** Ian Slater 8731649  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

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**Comment:** MM32 - LPMM18/3788  **Respondent:** Ian Slater 8731649  **Agent:**

MM32 A height limit for White Lion Walk is required.

Attached documents:

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**Comment:** MM33 - LPMM18/3789  **Respondent:** Ian Slater 8731649  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

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**Comment:** MM35 - LPMM18/3790  **Respondent:** Ian Slater 8731649  **Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

**Comment:** MM41 - LPMM18/3791  **Respondent:** Ian Slater 8731649  **Agent:**

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

**Comment:** MM44 - LPMM18/3792  **Respondent:** Ian Slater 8731649  **Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures

Attached documents:

**Comment:** MM9 - LPMM18/3785  **Respondent:** Ian Slater 8731649  **Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

**Comment:** MM41 - LPMM18/286  **Respondent:** John Freeland 8732321  **Agent:**

*MM41 - Land at Garlicks Arch* - Number of dwellings increased to 550

- Far from taking note of pervious objections, the proposal now is to increase the number of new dwellings by 150, which is unreasonable, excessive and unsustainable.
- This is Green Belt, only to be developed in exceptional circumstances, which cannot be claimed in this proposal
- Schools, Doctors’ Surgery and transport routes are already straining
- Car movements will increase by upwards of 1,100 per day

Attached documents:

**Comment:** MM42 - LPMM18/287  **Respondent:** John Freeland 8732321  **Agent:**
**MM42- Land at Burnt Common - Increase from 7,000 to 14,800 M2 industrial/storage**
- The Employment Lands Need Assessment shows a reduction in requirement for this type of development
- There is no demand for this expansion and Slyfield has spare capacity
- This is Green Belt, only to be developed in exceptional circumstances, which cannot be claimed in this proposal
- Taken together with a 25% increase at Send Business Centre this will result in an industrial allocation disproportionate to any other village

**Attached documents:**

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**Comment: MM44 - LPMM18/288** **Respondent:** John Freeland 8732321  **Agent:**

**MM44 - Land at Aldertons Farm - New site for 120 dwellings**
- This is Green Belt, only to be developed in exceptional circumstances, which cannot be claimed in this proposal
- Car movements will increase by upwards of 250 per day
- Schools, Doctors’ Surgery and roads are already at full capacity
- Taken altogether, the number of dwellings in the village will increase by 45%, which is disproportionate, unsustainable and an unreasonable burden on existing residents

The GBC Planning Policy Team have presided over a very opaque consultation process, with missing or misleading data; withheld reports and a complete disregard for the genuine concerns of local residents that the outcome of this plan will be to destroy the fabric of the village. We all accept the need for more homes in the borough and that this will result in some inconvenience, but the sheer scale of the present proposal is excessive and completely out of all proportion to need, policy and reason.

**Attached documents:**

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**Comment: MM9 - LPMM18/285** **Respondent:** John Freeland 8732321  **Agent:**

I should like to raise the following objections to the Local Plan: Strategy & Sites - Main Modifications:-

**MM9 - Green Belt Policy**
- Green Belt should be protected from development except in very special circumstances and none of the proposed developments can genuinely claim this exception.
- GBC Planning has capitulated under pressure from avaricious landowners and developers with a calculating statement to allow, “Limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” I suggest that an additional 770 dwellings, about 155 acres, can hardly be considered “limited infilling”.
- This gives GBC Planning the go ahead to allow developers carte blanche throughout the Borough and, as well as being grossly excessive, is a very dangerous precedent.

**Attached documents:**

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**Comment: MM13 - LPMM18/3192** **Respondent:** Simon Marshall 8732353  **Agent:**

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MM13. The allocation of this amount of additional retail space is completely unrealistic in today's retail environment. The evidence base is widely out-of-date given the current trends and impact of on-line shopping. Rather than develop more retail, redevelop unsustainable town centre retail sites into affordable and sustainable housing.

**Attached documents:**

**Comment:** MM2 - LPMM18/3191  **Respondent:** Simon Marshall 8732353  **Agent:**

**RE: GUILDFORD BOROUGH COUNCIL-LOCAL PLAN CONSULTATION.**

I write further to the publication of the revisions to the draft Local Plan. I object to the proposals for the following reasons:

1. **MM2.** I still consider that the Housing Target figure is wrong. The hearing on the Local Plan must be reopened in order that the latest ONS figures and household projections can be taken into account.

2. **MM2.** Why should Guildford be required to take Woking's unmet need especially as by doing so further green belt land will be required?

**Attached documents:**

**Comment:** MM3 - LPMM18/3194  **Respondent:** Simon Marshall 8732353  **Agent:**

S3. The town centre policy is inadequate and does not address the infrastructure deficit nor the structural changes currently being witnessed across the country in terms of the use of town centres.

**Attached documents:**

**Comment:** MM40 - LPMM18/3195  **Respondent:** Simon Marshall 8732353  **Agent:**

Site A35. The addition of land to the south of the site does not mitigate the housing density as much of this land is constrained by the VOR beacon.

I therefore demand that the examination of the Local Plan be re-opened so that current factual evidence can be considered to include ONS figures and that a revised retail demand forecast for Guildford Town Centre be commissioned, if not already available.

I also understand that GBC has been hiding behind a mis-interpretation of the GDPR regulations by only sending out 2,600 reminders and not 10,500 (last time)- no doubt in an attempt to reduce responses.

Please therefore take this latter as a formal **objection** to the proposals.

**Attached documents:**
**Comment: MM41 - LPMM18/3193**  
**Respondent:** Simon Marshall 8732353  
**Agent:** 

MM41. Transport strategy relies too much on inadequate modelling, including the delay to the M25 J10/RHS scheme. This will impact on proposal in the north of the borough, especially Three Farms Meadow.

Too much reliance is put on alterations to the A3 near Guildford, all of which are outside of GBC's control.

**Attached documents:**

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**Comment: MM2 - LPMM18/3639**  
**Respondent:** Tony Edwards 8733857  
**Agent:**

**OBJECTIONS to modifications to the Guildford Local Plan**

I should begin by recording the fact that I am appalled at the slipshod way in which these modifications have been presented and the undeniable fact that I was NOT advised of the consultation – despite being advised by e-mail previously.

My first suggestion is that this issue become the subject of a further public examination so that the LATEST [rather than dated] Office of National Statistics figures can be used.

In general may I record the fact that I wholly support the representations made by the Wisley Action Group [WAG] with written advice from leading counsel Richard Harwood QC. I trust GBC has bothered to read them because they present a true picture of the facts in this sorry tale of misrepresentation and unsupported ‘facts’.

**Attached documents:**

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**Comment: MM40 - LPMM18/3641**  
**Respondent:** Tony Edwards 8733857  
**Agent:**

Referring specifically to *Three Farms Meadows*, the former *Wisley airfield*, may I say that the addition of land to the South of the appeal site most certainly DOES NOT mitigate the density issue as much of the “new land” is constrained by the VOR – the beacon which prevents construction within a specific radius/

And why, may I ask, hasn’t the *People over Wind* case law been taken into account – which is clearly relevant in this issue?

**Attached documents:**

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**Comment: MM50 - LPMM18/3642**  
**Respondent:** Tony Edwards 8733857  
**Agent:**

Finally may I point out that the biodiversity of the SNCI will be totally destroyed by the proposed development as outlined in the modifications to the Local Plan.

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment: MM45 - LPMM18/2099</th>
<th>Respondent: W G Chant 8734689</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I was born in Normandy 84 years ago and in that time all shops and services have disappeared because of online shopping etc. there were 18 shops and we were self sufficient, now with the traffic avoiding Guildford by leaving the M25 + M3 and using Glaziers Lane, note LANE, as a short cut to A31 + A3 any more building will cause a more serious gridlock than we have at the moment.</td>
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<td>As for building an [unreadable text] I wonder if the future [unreadable text] all the food going to be introduced. There are plenty of [unreadable text] sites in the area but I know builders dont want the bother of clearing these sites.</td>
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<td>I object most strongly to this and any other plan for Normandy.</td>
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<th>Comment: MM41 - LPMM18/938</th>
<th>Respondent: Mr Bill Houghton 8734785</th>
<th>Agent:</th>
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<tr>
<td>My objection to the original application still stands &amp; the additional 150 homes makes even less sense. The local roads barely cope with current traffic, especially along the A247 between Burnt Common roundabout &amp; the bridge over the A3. My objection to use of Green Belt land is based on the benefits we all enjoy including wild life, &amp; habitat. Local medical facilities are already stretched to the limit, waiting times for appointments getting lengthier.</td>
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<th>Comment: MM42 - LPMM18/949</th>
<th>Respondent: Mr Bill Houghton 8734785</th>
<th>Agent:</th>
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<tr>
<td>An increase in the use of this land will only add to the problems of access on to the A247, to the A3 north &amp; south - local roads already stressed &amp; with no hope of widening. Nitrogen dioxide levels are already dangerously high.</td>
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<th>Respondent: Mr Bill Houghton 8734785</th>
<th>Agent:</th>
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<td>I object to this development as it will be yet another use of Green belt land, it will destroy local habitat, &amp; have a detrimental affect on local traffic, school &amp; medical facilities</td>
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<th>Comment: MM2 - LPMM18/1439</th>
<th>Respondent: Carol Mullan 8735713</th>
<th>Agent:</th>
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I object to the scale of new housing planned for Ripley and Send.

This will forever change the nature of our villages and increase road traffic.

Town centres and brownfield sites should always be used first - not green belt sites.

Policy S2

The housing needs figures have been grossly exaggerated and this is surely fuelled by the profits that building the houses would generate.

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are hugely less than the total assumed by the Inspector. This could make a massive difference to the proposed developments in Send.

I call for the examination in public to be reopened so that the latest Office of National Statistics can be used.

I support the representation made by WAG which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM2 - LPMM18/3182  Respondent: Carol Mullan 8735713  Agent:

I object to the scale of new housing planned for Ripley and Send.

This will forever change the nature of our villages and increase road traffic.

Town centres and brownfield sites should always be used first - not green belt sites.

Policy S2

The housing needs figures have been grossly exaggerated and this is surely fuelled by the profits that building the houses would generate.

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are hugely less than the total assumed by the Inspector. This could make a massive difference to the proposed developments in Send.

I call for the examination in public to be reopened so that the latest Office of National Statistics can be used.

I support the representation made by WAG which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM51 - LPMM18/2058  Respondent: Tom Suffolk 8736865  Agent:
I wish to fully support the amendment of the Local Plan, and the work of Guildford Borough Council and West Horsley Parish Council, and the Amendment to bring the Green Belt boundary back to the original Green Belt boundary as proposed at the main map at title document Amendment 1 page 84.

I strongly oppose the Amended Green Belt Boundary indicated at the upper right-hand side of page 84. We and many others wish to protect the rural character and unspoilt tranquility of the landscape so that it can be valued by residents of, and visitors to, West Horsley.

Such a development would amount to an unwarranted and unnecessary destruction of the Green Belt and would destroy the rural character and tranquility of our village.

Attached documents:

Comment: MM51 - LPMM18/2047  Respondent: R Kimpton 8742337  Agent:

Re: Guildford Local Plan - Strategy & Sites - Main Modifications 2018 Sept 2018

MM51 Amendment 1: Horsleys - West Horsley (South) - map page 84

We strongly approve this amendment, which moves a previously proposed unsound and indefensible boundary - being a basic post & rail fence - and therefore not a valid argument to bring greenbelt land into village settlement boundary.

We can see no merit including this high value prime agricultural land into the village boundary. Possible development will be vigorously opposed, costly and be of little value to an affordable housing vision.

The new proposed modification now runs in a straight line along the back of Silkmore Lane and will protect and preserve the highly valued rural character of West Horsley South as it faces beautiful open countryside toward the National Trust's Hatchland Park.

The tranquility and beauty of this unspoilt side of the village adjacent to the conservation area with its 42 listed buildings, is highly valued not only by village and local residents, but also by visitors to the area, particularly specified by Olympic and frequent cycling events, should be preserved at all costs.

Attached documents:

Comment: MM2 - LPMM18/2958  Respondent: Jane Vessey 8743777  Agent:

I wish to request that the Local Plan is reconsidered in light of the revised housing requirements from the ONS. It is a very significant change with only 360, rather than 672, extra homes required. More specifically, with respect to modification number MM2,

• The revised numbers should lead to reduced building needed on the Green Belt.
• If town centre sites could be developed, surely sensible in light of the deteriorating business environment of high street shops, then the requirements to build on the Green Belt could be reduced further.
• I fail to see why Guildford should provide additional homes for Woking.

Attached documents:
Comment: MM51 - LPMM18/2597  Respondent: Daphne Padfield 8743969  Agent:

Amendment 1: Horsleys - West Horsley (South) (MM51) - map page 84

I understand that West Horsley Parish Council have successfully brought back Silkmore Lane's "defensible" property boundary to the West. While I am unclear what makes this boundary "defensible" I am certainly in favour of not extending building to the West of Silkmore Lane, so support the modification. There is already one building, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] which extends beyond the pleasing line as one travels down Ripley Lane towards the Street. How this site was given planning permission to turn it from a cottage into a mansion more suitable to a Bournemouth waterfront property I cannot imagine. However, my principal objection to building between Ripley Lane and Silkmore Lane is that traffic access in the area is already problematic and further building, therefore more cars, would only inflate the problem.

Attached documents:

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Comment: MM45 - LPMM18/567  Respondent: Alan Burchett 8747969  Agent:

**GUILDFORD LOCAL PLAN**

I am writing with regard to Main Modification 45 dealing with Policy A64 of the Local Plan

I object to the inclusion of this site for the following reasons.

1. **INCLUSION OF SITE A64 & INFRASTRUCTURE**

Site A64 has never been put forward as a ‘Policy’ although it was given consideration as part of the Sustainability Appraisal in 2017. Its appearance now as part of the Local Plan is a complete surprise to residents and gives little opportunity to properly comment on its inclusion or to suggest other suitable sites.

When site A46 (land to the south of Normandy and north of Flexford) was withdrawn from the submission Local Plan, the infrastructure projects associated with the site were also removed. It would be hoped that there would be infrastructure projects to support site A64, should it be included in the Local Plan. 105 houses would generate a significant increase in traffic on Glaziers Lane, which is an unclassified road (D60) and is already a busy commuter route for cars, commercial vehicles, lorries, multi-axle heavy goods vehicles and articulated lorries travelling between the A323 Guildford to Aldershot Road and the A3 and A31, with many of the vehicles failing to adhere to the speed limit of 30mph. Traffic management improvements would be needed at both ends of Glaziers Lane, at the junction of Flexford Road/Westwood Lane, and at the B3000 Puttenham Hill/A31 Hog’s Back junction.

Other infrastructure projects that would be needed are:

- **Bus network to provide the southern end of Glaziers Lane with a regular bus service, as the nearest bus route is on the A323 more than a mile away (Previous planning applications for developments in the Lane have claimed there is a bus route in Glaziers Lane, but this is extremely limited in its scope).**
- **Cycle network to provide a safe means of cycling along the dangerous unclassified Glaziers Lane and surrounding road network**
- **Improvements to the railway bridge to make it safe for pedestrians and cyclists (see Glaziers Lane section below).**
- **Upgrade of the sewerage network, as this is notoriously inadequate for the existing village population.**
- **Expansion of Wyke Primary School to accommodate the number of pupils of primary school age from the new development**
- **Improvements to rectify the sunken road surface of the railway bridge (see Glaziers Lane section below).**
A major infrastructure project that would have to be undertaken is to resolve the issue of the public footpath that bisects this site and continues to cross the railway line on an uncontrolled crossing. Significant work would have to be undertaken before the site could be considered safe for a major housing development with such a footpath running through it, exposing children to huge risk on the uncontrolled crossing.

2. THE GREEN BELT & EXCEPTIONAL CIRCUMSTANCES

A planning application (16/P/01452) was submitted for just the front field of site A64 for the construction of 42 new residential units with associated parking and gardens and was refused on 14 February 2017

The reasons for the refusal were:

1. The proposed development is located in the Green Belt, outside any identified settlement area and therefore represents inappropriate development, which is by definition harmful to the openness of the Green Belt and conflicts with the purposes of including within it. While there are circumstances that weigh in favour of the development these do not amount to the very special circumstances such as to clearly outweigh the substantial harm arising.

2. The proposed development would introduce development at depth which fails to respect the linear pattern of development that is characteristic of this part of Glaziers Lane. Furthermore, the proposal would close the visual gap that exists between Normandy and Flexford, both to the detriment of the character and appearance of the area.

A further planning application (17/P/01413) was submitted for just the part of Site A64 fronting on to Glaziers Lane for the construction of 9 new residential units with associated parking and gardens and was refused on 19 January 2018

The reasons for the refusal were:

1. The proposal is considered to constitute inappropriate development in the Green Belt and would cause material impact to the openness of the Green Belt. There are no very special circumstances which outweigh the substantial harm to the Green Belt by reason of its inappropriateness and the actual harm to the openness of the Green Belt.

2. The scale and bulk of the proposed dwellings and the resultant spread of development across the undeveloped and open site would have a detrimental impact on the open character of the existing site and would appear as an incongruous feature within the immediate rural setting, leading to the erosion of the rural edge of the built up area of Glaziers Lane.

3. The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). The Local Planning Authority is not satisfied that there will be no likely significant effect on the Special Protection Area and, in the absence of an appropriate assessment, is unable to satisfy itself that this proposal, either alone or in combination with other development, would not have an adverse effect on the integrity of the Special Protection Area and the relevant Site of Special Scientific Interest (SSSI). In this respect, significant concerns remain with regard to the adverse effect on the integrity of the Special Protection Area in that there is likely to be an increase in dog walking, general recreational use, damage to the habitat and disturbance to the protected species within the protected areas.

The reasons for refusal of the planning applications for 42 houses in February 2017 and 9 in January 2018 are just as applicable now as they were at the time of refusal, especially as both applications are very recent, and also as the A64 proposed development is much more dense at 105 houses. Also relevant is that GBC have given no special circumstances for the proposal to build on this site that would justify redrawing the Green Belt boundary.

3. SUSTAINABILITY

The ‘Sustainability Appraisal of the Guildford Local Plan – Report update June 2017’ lists 18 sustainability issues and objectives, and yet site A64 is included as a possible development site on the basis of just one issue, that being its proximity to Wanborough Railway station. It can be expected that from a new development of 105 houses only a small
proportion of the new residents will use a train to get to work, as their place of work is unlikely to be linked to rail transport if they have moved to Normandy from elsewhere. Therefore the sustainability issue is a ‘red-herring’.

The SA makes it clear that “There are no existing facilities in Flexford, and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality.....”

The SA also says, “Flexford is also notable in that it is a small village without even a Primary School.” It continues, almost in desperation to find a positive point, “Nearby Normandy does have a Primary School and a GP Surgery.” However, from research carried out within the village, it appears that the School would not be able to accommodate the number of pupils of primary age that would come from a development of 105 homes, and the GP surgery would struggle to add over approximately 250 new residents to its list.

It is also acknowledged in the SA that “Land east of Glaziers Lane falls as comprising ‘red-rated’ Green Belt.”

4. GLAZIERS LANE

As stated above (within Infrastructure section), Glaziers Lane is an unclassified road (D60) and the increased traffic movements generated by an additional 105 houses would pose extra dangers. The Lane is a rural, residential road, just 6 metres wide at the widest point, with a 30mph speed limit throughout its length and has become a ‘rat-run’ for vehicles accessing the A3, A31 and A323.

From 7.00am there are approximately 15 Grab Lorries an hour entering and exiting the waste management site at Strawberry Farm, most exceeding the speed limit on the stretch of road from the railway bridge to the Strawberry Farm site. These pose an additional and ongoing daily risk to other road users and pedestrians, and would do so especially to residents from the proposed development given the proximity of the road bridge over the railway to any access road to the site.

Parked vehicles are mostly parked on the pavement owing to the narrowness of the rural Lane. This means that pedestrians, those in wheelchairs and parents/carers with pushchairs or prams, have to walk in the road and are at risk from passing vehicles.

The street lighting in Glaziers Lane is poor and could at best be described as footpath lighting. Towards the southern end of the Lane is a humpback road bridge over the railway line, which has a sharp incline and decline so that on approach there is no view of the other side of the bridge. The bridge is also on a slight, but deceptive, double bend in the road. At this point the Lane narrows to 5.5 metres, slightly under in places. This is an especially dangerous part of the Lane as cars speed towards the bridge from both directions, with no view of the other side. The roadway of the bridge is badly sunken on both sides due to the weight of the heavy goods vehicles crossing the bridge. This bridge would be hazardous for cyclists travelling to and from the proposed development and, because of the narrowness of the bridge, no dedicated cycle lane could be installed. Because of the hazards mentioned, pedestrians already have to exercise extreme caution when crossing the bridge. At the northern end of the Lane is the junction with the A323 Guildford to Aldershot Road, where Glaziers Lane crosses over to Hunts Hill Road. This is a difficult junction to negotiate owing to the amount of traffic travelling along the main road, and also because there are cars turning right out of Glaziers Lane on to the main road, cutting across the path of cars coming across from Hunts Hill Road, with both sets of drivers attempting to find a gap in the main road traffic. There is often a tail-back of traffic in Glaziers Lane waiting to exit, and traffic from 105 additional houses will only exacerbate the problems.

The single footpath along the Lane is not continuous, changing from side to side of the road along its length. This means that pedestrians have to cross the road at various points in order to remain on the footpath, with two exceptionally dangerous crossing points.

Currently there are 2 plots being developed in the southern reaches of Glaziers Lane, both for single detached dwellings. The disruption caused by workers’ cars and vans, and delivery lorries, for just 2 houses, has been intense, due to the narrowness of this rural Lane. The disruption caused by the construction of 105 houses over a short time scale on site A64 is unimaginable.

5. ACCESS TO THE PROPOSED SITE
The proposed site is in an exceptionally dangerous position with regard to access to and from the site, as it is very close to the road bridge that crosses the railway line. Speeding vehicles approaching from the south would only have a short stopping distance after crossing the blind summit of the bridge before arriving at possible access points for the site. This is already a problem for those in wheelchairs, the elderly and infirm, and parents/carers with pushchairs or prams, who have to cross the road here, as the pavement is not continuous, and who require more time to cross the road.

6. FISHING LAKE & FLOODING

A large proportion of site A64 comprises of a deep fishing lake and there has been no attempt by GBC to indicate how this would feature in the development of the site.

Also, the Sustainability Appraisal acknowledges that, “This site is associated with a degree of surface water flood risk at the eastern extent.”

7. H&S - PROXIMITY TO WASTE MANAGEMENT SITE, RAILWAY LINE & ROAD BRIDGE

Site A64 is directly adjacent to the Strawberry Farm waste management site. Waste material, such as bricks, concrete and soil are taken in from building sites and processed, crushing the bricks and concrete and screening the soil for resale. Green waste is also taken in from tree surgeons and composted. There are huge piles of material within 25 metres of the rear boundary of site A64 which includes composted green waste and when this is moved the smell is intolerable to residents and airborne particles must be a danger to health. When the hard materials are crushed the noise can be clearly heard for days on end by residents living in all parts of Glaziers Lane. There is also noise from heavy machinery on a daily basis. The proximity of site A64 to the waste management site would surely be a health and safety hazard for the residents there.

See above (Infrastructure section) for details of the public footpath that bisects this site and crosses the railway line at an uncontrolled crossing.

See above (Glaziers Lane section) for details of the dangers pedestrians and cyclists are exposed to when crossing over the railway bridge.

I believe that Normandy should accept some housing development as part of the Local Plan, but not on the Green Belt.

A planning application (17/P/02326) was submitted in 2017 to build 30 dwellings on a previously developed site at The Elms Centre in Glaziers Lane GU3 2DF. This application was refused in February 2018.

This would be a much more preferable site to develop than the proposed site A64 as it is not in the Green Belt and utilises previously developed land. This would be more readily acceptable to residents.

Attached documents:
2. that a roundabout or traffic lights should be installed at the busy and dangerous junction of the A248 and the A2128.

3. that a pedestrian crossing should be installed to allow safe access to Tillingbourne Junior School.

4. that the existing requirement for sensitive design, siting and form of the development should refer explicitly to sensitive design at the site boundaries having regard to the Green Belt location.

**Attached documents:**

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**Comment:** MM45 - LPMM18/534  **Respondent:** Paul Bouncer 8748609  **Agent:**

I am writing to object to the above change to the Local Plan proposal of site - Policy A64: Land Between Glaziers Lane and Strawberry Farm, Flexford; on the basis of the following points:

- Responding correctly to this proposal has been difficult when the ‘exceptional circumstances’ as to why the green belt can be altered have not been made available to us.
- This is green belt area and adjacent to an area of outstanding natural beauty. If approved its development would fundamentally alter the importance of protection of our green belt for future generations, aside from visually impacting an area of outstanding natural beauty adjacent to it and highly visible from the top of the Hog’s Back.
- There are numerous brown field sites listed on the GBC web site. Whilst recognising that for developers these are not a cheap option’s v’s green belt land, surely repurposing brown belt land must come before the desecration of the green belt? Perhaps developers should be forced to take on 5 houses in brown field sites for every 5 in the green belt, halving the impact??
- Glaziers Lane is a narrow lane with an awkwardly angled railway bridge and sharp right hand bend that compromise the road width even further. Such a development with all the additional traffic is going to increase the risk of a serious accident/death in the Lane. It’s important to note this is a Lane not a road, and any possible entrance exit to this site would be unsighted by traffic approaching from the South increasing this risk significantly, especially as at peak times people speed down the lane.
- Light pollution is currently very low in Glaziers Lane this development would increase this considerably with cars at night turning in and out of any access road, which will have a knock on impact on wildlife in the area.
- We currently have a thriving population of hedgehogs which do cross the Lane and increased traffic is highly likely to impact them directly, whilst not on any endangered list now there is serious concern over their future as they continue to disappear from our hedgerows.
- There are a good number of mature oak trees in site A64, with all of the issues over the last couple of decades with disease we need to ensure their protection, not building here and so not impacting their environment would be a good support.
- Noise pollution is also low in this part of Glaziers Lane, adding 105 houses would dramatically change this in a negative way, adding circa 200 plus cars to the area which is a significant impact.
- People park in the lane especially if they have a larger number of visitors, with the current limited housing this is less of an issue but adding in so many more houses with limited parking will result in an increase in the occasions when people will park in Glaziers Lane and again increase the risk of accidents (as people always park as near as they can to where they want to be) coupled with the higher traffic volumes again especially important being so near the blind approach from the railway bridge.
- The fields and land all around Normandy Village are subject to excessive water build up this will be clearly visible as we move into winter. We are in an area of clay with a high water table, which the standing water after rain at all differing levels reinforces. Such a large development is going to impact this and may affect the water table in a wider area putting houses at risk of flooding?
- Has a survey been carried out of the lake including any wildlife it supports in the surrounding area. We assume such a plan will result in the lake being drained for houses to be built? Please note the lake to my knowledge has
never dried out, so there is a source of water into it that will end up bubbling up somewhere else causing risk of flooding?

• Sewage / general drainage is an issue in Glaziers Lane, is a significant issue in the Lane. Adding 105 houses will place a massive additional strain on an already challenged sewage system (the system has already collapsed twice in the last few years at the northern end of the Lane, and dip has started forming again recently so later this winter may see it collapsing again). All the additional lorries over a 3 year period to build these houses will massively accelerate this issue and the risk of damage to the road and the just renewed pavement.

• Special note on the heavy lorries associated with such a development. The lorries associated with Backhurst etc are already noticeable in that you can feel them in the house as they go by (sometimes at excessive speeds!!) The massive increase in such large vehicles is going to further damage the road and potentially cause our structural issues to houses in the area. Also the buses and lorries that currently come down the Lane (please note not a road) find it very difficult to stay on their side of the Lane due to its narrowness and completely impossible to turn in and stay on the correct side of the road, both dangerous and very unnerving as a driver going towards them.

Attached documents:

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Comment: MM2 - LPMM18/3041 Respondent: Charlotte Beckett 8749473 Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2.1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2.2. There is too much reliance on A3 improvements and these are beyond the council’s control
   2.3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   2.4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   3.1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3.2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.
The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
**Comment: MM23 - LPMM18/3044  Respondent: Charlotte Beckett 8749473  Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of **“green approaches”** should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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**Comment: MM23 - LPMM18/3051  Respondent: Charlotte Beckett 8749473  Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment: MM3 - LPMM18/3042  Respondent: Charlotte Beckett 8749473  Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential areas.**

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

**Comment:** MM31 - LPMM18/3045  **Respondent:** Charlotte Beckett 8749473  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

**Comment:** MM32 - LPMM18/3046  **Respondent:** Charlotte Beckett 8749473  **Agent:**

MM32 A height limit for White Lion Walk is required.

Attached documents:

**Comment:** MM33 - LPMM18/3047  **Respondent:** Charlotte Beckett 8749473  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

**Comment:** MM35 - LPMM18/3048  **Respondent:** Charlotte Beckett 8749473  **Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

**Comment:** MM41 - LPMM18/3049  **Respondent:** Charlotte Beckett 8749473  **Agent:**

Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

**Comment:** MM44 - LPMM18/3050  **Respondent:** Charlotte Beckett 8749473  **Agent:**

The new Green Belt site at Send is not justified in view of the revised housing figures.

**Attached documents:**

**Comment:** MM9 - LPMM18/3043  **Respondent:** Charlotte Beckett 8749473  **Agent:**

In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

**Comment:** MM51 - LPMM18/1406  **Respondent:** Chris Tailby 8749697  **Agent:**

I am writing in support of the above amendment which returns the West Horsley village boundary to its original position. It is important that the amendment is maintained so as to preserve the rural character and landscape from development. The land in question is greenbelt and should remain so.

I would be grateful if you would note my firm approval of this modification.

**Attached documents:**

**Comment:** MM51 - LPMM18/4072  **Respondent:** Chris Tailby 8749697  **Agent:**
I am writing to object to the proposal that West Horsley village should be “inset” i.e. removed from the Green Belt. GBC have never demonstrated that there are exceptional circumstances which justify such removal. Furthermore, new lower population and household figures have been produced by the ONS so instead of 630 extra homes plus Woking’s “unmet need” current research indicates that we only need 360 extra homes a year. Indeed, I object to Guildford having to take Woking’s “unmet need” (MM2). Accordingly I want the hearing to be reopened so that the latest figures can be considered by the Inspector.

I consider that with more residential development in Guildford town centre and better use of brownfield sites, the housing need can be met and the insetting of the village is unnecessary.

Attached documents:

Comment: MM2 - LPMM18/1613  Respondent: Roger Harrington 8749889  Agent:

I am writing in relation to the Guildford local plan and in particular in relation to amendment MM2. I have the following observations:

The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, and Woking’s need figure has also reduced and has not been examined.

Attached documents:

Comment: MM13 - LPMM18/2316  Respondent: Nicholas Howe 8751169  Agent:

MM13. The allocation of this amount of additional retail space is completely unrealistic in today's retail environment. The evidence base is widely out-of-date given the current trends and impact of on-line shopping. Rather than develop more retail, redevelop unsustainable town centre retail sites into affordable and sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/2315  Respondent: Nicholas Howe 8751169  Agent:

RE: GUILDFORD BOROUGH COUNCIL - LOCAL PLAN CONSULTATION

I writer further to the publication of the revisions to the draft Local Plan. I object to the proposals for the following reasons:
MM2. I still consider that the Housing Target figure is wrong. The hearing on the Local Plan must be re-opened in order that the latest ONS figures and household projections can be taken into account.

MM2. Why should Guildford be required to take Woking's unmet need especially as by doing so further Green Belt land will be required?

Attached documents:

Comment: MM3 - LPMM18/2318  Respondent: Nicholas Howe 8751169  Agent:

S3. The town centre policy is inadequate and does not address the infrastructure deficit nor the structural changes currently being witnessed across the country in terms of the use of town centres.

Attached documents:

Comment: MM40 - LPMM18/2319  Respondent: Nicholas Howe 8751169  Agent:

Site A35. The addition of land to the south of the site does not mitigate the housing density as much of this land is constrained by the VOR beacon.

I therefore demand that the examination of the Local Plan be re-opened so that current factual evidence can be considered to include ONS figures and that a revise retail demand forecast for Guildford Town Centre be commissioned, if not readily available.

I also understand that GBC has been hiding behind a mis-interpretation of the GDPR regulations by only sending out 2,600 reminders and not 10,500 (last time) - no doubt in an attempt to reduce responses.

Attached documents:

Comment: MM41 - LPMM18/2317  Respondent: Nicholas Howe 8751169  Agent:

MM41. Transport Strategy relies too much on inadequate modelling, including the delay to M25 J10/RHS scheme. This will impact on proposal in the north of the borough, especially Three Farms Meadow.

Too much reliance is put on alterations to the A3 near Guildford, all of which are outside GBC's control.

Attached documents:

Comment: MM45 - LPMM18/1357  Respondent: Christine Melville 8753729  Agent:
I am opposed to the proposed building of 105 houses between Flexford and Normandy which will increase housing by 7% in the area and will remove land from the Green Belt. With the new lower housing requirement for the Guildford area from over 670 new houses per year to 360 per year there can be no justification for removing land from the Greenbelt.

What are the exceptional circumstances to allow removal of land from the greenbelt? I also have concerns with the increase in traffic 105 houses will cause. The roads around Normandy are dangerously busy already and are used as cut throughs when there are jams on A31, A3, M3 and M25 and the flow of traffic is too much for a quiet residential area surrounded by green fields, ancient woodland and AONB. There are no facilities in Flexford and relatively few in Normandy but an increase to housing of 7% would require infrastructure which is not there.

Attached documents:

Comment: MM23 - LPMM18/28  Respondent: Poyle Road Campaign Group (Mr Michael Heath) 8767617  Agent:

Please improve our existing roads with modern drainage and traffic control- ie enhance what we have to cope with the new

What we have is not maintained to a suitable standard blamed on financial cutbacks.

Enhancement should include measures to restrict the speed of traffic in and around Villages - ie Speed Control Zones

Attached documents:

Comment: MM45 - LPMM18/73  Respondent: Casper Gorniok 8768417  Agent:

I'm probably in a tiny minority, but in all honesty, I think Guildford Borough Council should come up with a far more creative solution for Normandy.

Building 105 homes on Glaziers Lane Site (A64) will simply increase more traffic over a very dilapidated railway bridge, which should be knocked down and re-built.

You should think bolder, and create a 3,000 home "all-inclusive" village, which has:

> Upgraded roads - Westwood Lane is so worn out / Glaziers Lane + Dilapidated Railway Bridge is a safety hazard.

> Retail - We have NO shops or meeting places (such as a pub/coffee shop)

> We DO have a surgery & station

> We should have 21st century business/office facilitaties for small businesses

> Upgrade Sewage & Overhaul the flooding issues that have best the village for many decades.

My vision would be to turn Normandy into a "Cobham" - somewhere all-inclusive where you could do so much locally, and that would be good for the environment.

I am totally against building more houses and no improvement in facilities / amenities - but that doesn't mean building a secondary school, either.

Best wishes,
Casper Gorniok [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

Attached documents:

**Comment: MM9 - LPMM18/4196**  
**Respondent:** The Nuance Group UK Ltd (Nicole Mapplebeck) 8768833  
**Agent:**

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

**Comment: MM2 - LPMM18/5382**  
**Respondent:** Phil Attwood 8770177  
**Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
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9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.
MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

**Comment:** MM31 - LPMM18/5393  **Respondent:** Phil Attwood 8770177  **Agent:**

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**Comment: MM2 - LPMM18/5565**  **Respondent:** Gabrielle Attwood Attwood 8771169  **Agent:**

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MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/5568  Respondent: Gabrielle Attwood Attwood 8771169  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

Attached documents:

Comment: MM3 - LPMM18/5566  Respondent: Gabrielle Attwood Attwood 8771169  Agent:
MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5569  Respondent: Gabrielle Attwood Attwood 8771169  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5570  Respondent: Gabrielle Attwood Attwood 8771169  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5571  Respondent: Gabrielle Attwood Attwood 8771169  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

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<td>MM44 The new Green Belt site at <strong>Send</strong> is not justified in view of the revised housing figures.</td>
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<tr>
<td>MM9 In Green Belt, proposed limited <strong>infilling outside identified settlement</strong> boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
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310 of 2554
MM13 I OBJECT to the lack of consideration of the existing brownfield sites in the town centre particularly in view of the current trends to shop on line, and loss of retail businesses thus making it possible to build affordable houses within the existing township.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/1421</th>
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<td>MM2 The suggestion that Guildford takes Woking unmet housing needs which will result in a further loss of green belt land. In particular I OBJECT to the proposal to build another 500 houses in Send, all of whom will be dependant on cars.</td>
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<td>MM47 Despite the site of &quot;3 Farms Meadows &quot;being designated an area of ecological importance the size of the SNCI is much reduced. I OBJECT strongly to its exemption from design constraint A35 3 Farms Meadows I OBJECT strongly to this being a subject of the discussion because of the addition of land to the south of the appeal site which is prevented by VOR from any construction within a radius of the air traffic control beacon In conclusion I call for the hearing to be reopened so that the latest ONS figures can be reconsidered and these matters of grave concern can be addressed.</td>
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<th><strong>Respondent:</strong> David French 8772801</th>
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<tr>
<td>Ref: Guildford Borough Council’s Modified Local Plan consultation</td>
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<tr>
<td>I would like you to note my following comments:</td>
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1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   **MM2** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   **MM2** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   **MM2** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   **MM2** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   **MM2** Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

   **Attached documents:**

   **Comment: MM23 - LPMM18/5613  Respondent: David French 8772801  Agent:**

   **MM23** In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

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   **MM23 – POLICY D1.** Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

   In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.
The Plan is unsound and should be re-examined.

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MM32 A height limit for **White Lion Walk** is required.

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MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment:** MM9 - LPMM18/5692  **Respondent:** David French 8772801  **Agent:**

**MAIN MODIFICATIONS MM9 GREEN BELT**

I strongly object to the Council’s determination to ride roughshod over the Green Belt adopting an approach which contravenes Case Law, the revised NPPF and the stated policy of HM Government. Guildford Council needs to appreciate that the law and Government policy applies to it in the same way as it does to everybody else. Without repeating all the case law here “exceptional circumstances” and “special circumstances” have been amply defined in court decisions. Guildford Council continues to show no signs of being aware of that, of, if aware, ready to comply.

**MM9 GREEN BELT INSETTING OF VILLAGES**

I object to Guildford Council making an exception to Green Belt policy allowing “limited infilling outside the identified settlement boundaries where it can be shown that a site should be considered to be within the village”. Considered by whom and on what criteria? This introduces a subjective test and considerable uncertainty. If Guildford Council wanted to try to negate Green Belt protection this effectively does it. It means that any land on the edge of a village like Send could be picked off for development, an open invitation to developers and speculators at the expense of residents. This approach by Guildford Council is seriously anti-democratic and shows a complete betrayal of the trust conferred on them at the last ballot box.

**Attached documents:**

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**Comment:** MM2 - LPMM18/4346  **Respondent:** Anthony & Anne Bond 8773377  **Agent:**

MM2 - We urgently suggest that the examination be reopened in light of the latest figures from the Office of National Statistics. The 630 proposed number has been based on totally inappropriate assumptions and expert Neil MacDonald has demonstrates that a figure of 360 would be more than sufficient. There is now scope to remove some green belt sites and more scope to develop town centre sites in a responsible and sensitive fashion. Further hearings should be held urgently.

**Attached documents:**

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**Comment:** MM35 - LPMM18/4347  **Respondent:** Anthony & Anne Bond 8773377  **Agent:**

MM35 - Gosden Hill should be kept as Green Belt. It’s development will lead to severe congestion along Epsom & London Road.

**Attached documents:**
Comment: MM2 - LPMM18/1733  Respondent: Ian Elliott 8774113  Agent:

I wish to object to the above on the following grounds:

- Inclusion of Three Farms Meadows in plan. The SOS has made it perfectly clear that this is an unsuitable site for development. This is principally because it is in a totally unsustainable location with very poor transport links, and the adverse affect on the AONB, the local community, and all the other reasons that he gave in his judgment. So why is it still included? Please remove it and find somewhere more suitable to meet the local housing need. The fact that it has not already been removed is somewhat suspicious. Other sites have now been added so Three Farms Meadows can now be removed.

- ONS data and therefore planning assumptions for housing has changed radically since the plan was first created. The plan now needs to be revised in line with the correct planning assumptions. Not to do this would be egregious and would easily be challenged. Make the plan on the best information available not the worst.

Attached documents:

Comment: MM2 - LPMM18/2545  Respondent: Gary Cooper 8774369  Agent:

I object to the proposed amendments to the 2017 draft local plan for the following reasons:–

| I believe the Planning Inspector has misrepresented the residents of Send | The 2017 plan already contained proposals to develop more housing than the original concept and over 30,000 objections were made to this. The amendments now under consideration allow for further increase in housing numbers in an area where the Infrastructure is already struggling to cope. |

Attached documents:

Comment: MM42 - LPMM18/2546  Respondent: Gary Cooper 8774369  Agent:

I object to the proposed increase in industrial / commercial development at Burnt Common.

| MM42 | There was never any justification or sensible reason to consider such development in the proposed area although it is now proposed to double the original plan. |

There is no need to put industrial development on green belt land, especially whilst Slyfield has unused capacity and such development would put further strain on the narrow road system and further increase Nitrogen Dioxide levels, which are already dangerous.

Attached documents:
I object to the reintroduction of Aldertons Farm for 120 plus houses.

This development had been previously removed from the local plan, presumably because it had been identified that the many objections raised against it had proven to be valid.

There has been no change in local circumstances and this proposed development would put immeasurable strain on the already overloaded infrastructure.

Relating to all of the above proposals: At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year.

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockharn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.
In spite of previous objections by numerous residents, this has been increased from 400 to 550 homes of which 450 to be built in the first five years. An increase of 37% in the number of houses proposed is excessive.

Approximately 7,000 objections to the previous lower number have been ignored and proposed development continues to increase in scale. My objections are on the basis of:

- This is Green Belt containing ancient woodland.
- Send and Ripley villages will be joined and this constitutes over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will cause congestion in the adjacent roads which are not designed to cope with this scale of traffic
- School and medical facilities will be strained to breaking point; to this point I have seen no plans to increase the capacity of these services

Attached documents:

Comment: MM41 - LPMM18/774  Respondent: Shaun Cheyne 8775169  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/770  Respondent: Shaun Cheyne 8775169  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

This has been increased from 7000 to a minimum of 14,800 sq m of industrial and storage. Since being deleted from the 2014 plan this has been increased twice, doubling the area. It makes a mockery of the ‘consultations’ with residents as we’ve not only been ignored but the numbers have been escalated.

It is by far the largest new industrial allocation in any village in the borough

There is no need to put new industrial sites in the Green Belt when Slyfield has unused capacity.

There are no special circumstances so it also contradicts MM9.

The Employment Land Needs Assessment showed a reduction in demand for industrial sites.

Narrow surrounding roads will be gridlocked.

Attached documents:
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

New site for 120 Homes

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July. Again, ‘consultations’ with residents have been ignored and the numbers have been escalated.

It is a Green Belt site with no special circumstances so it also contradicts policy MM9

It will detract from the heritage buildings at Send Marsh Green

The additional traffic will increase pressure on the Send Crossroads.

With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

MM9 Green Belt Policy
Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

**Comment:** Other comments - LPMM18/777  **Respondent:** Shaun Cheyne 8775169  **Agent:**

**Other Developments**

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to this the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

**Comment:** MM23 - LPMM18/1897  **Respondent:** Brian Wolfe 8792193  **Agent:**

MM23 Policy D1 as revised is a dilution of the of the social dimension of sustainability eg walking distance and pedestrian and cycle routes.

Strategic site are to be exempt from design constraints which will result in developments such as Wisley which are totally out of character and scale of the area.

Attached documents:

**Comment:** MM41 - LPMM18/1896  **Respondent:** Brian Wolfe 8792193  **Agent:**

MM41 The transport strategy for this site at Send and that at Wisley relies on the inappropriate use of traffic modelling initially used in the failed planning application for the development at Wisley. It was not possible to challenge the data used in the modelling as no current data was provided. Earlier version where challenged by SCC and HE which has now resulted in HE & GBC agreeing that a new model needs to be developed to determine the true picture for both LRN and SRN. This clearly indicates that current decision made around these 2 key sites in terms of transport infrastructure and their inclusion in the Local Plan are premature and can only be included in the plan with a suitable caveat.

MM41 There is too much reliance on the improvements for the Guildford stretch of the A3 the Wisley section of the A3 and the M25 junction 10 all of which impact on the time table for the above sites.

Attached documents:
Comment: MM9 - LPMM18/1895  Respondent: Brian Wolfe 8792193  Agent:

MM9  The infilling of villages will result in the weakening of the protection of the countryside. The insetting of villages like East and West Horsley has opened up large areas of these larger villages for housing development 40% of which will be affordable. East Horsley shows the lowest demand for affordable housing in the whole borough. Yet GBC are under the impression that all the affordable housing built will remain affordable in perpetuity under planning constraints. As both East and West Horsley and not protected under the legislation protecting rural areas from the rights to acquire, to buy or enfranchise. This will not be the case and affordable homes built will be open to the market.

Attached documents:

Comment: MM27 - LPMM18/448  Respondent: Janet Manktelow 8793025  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic changes for this village are hideous. The situation of the 4 way junction will pile on the traffic nightmares for local people. No changes are planned to relieve congestion in the surrounding villages which already suffer congestion every day. The current A3 is blocked every morning and evening. Adding a four way junction will do nothing to relieve this situation. Any slight accident blocks within minutes and takes hours to clear.

Attached documents:

Comment: MM41 - LPMM18/445  Respondent: Janet Manktelow 8793025  Agent:

We wish to object in the strongest possible terms to the latest modification proposed for Send, Send Marsh and Burnt Common area.

The residential implications of the increase in housing for our village represent a 37% increase over current numbers which is unacceptable. Our village would be swamped without better infrastructure changes, more shops, schools etc. In fact a school in Ripley has closed this summer which will increase the challenges faced locally and this would in turn change the character and image completely.

MM41

We had already objected to the plan to put a large development on the lad at Garlick’s Arch. The very fact that the number of dwellings has been increased so dramatically by 150 to 550 dwellings beggars belief. The land contains Ancient Woodland and is on the Green Belt. There are no exceptional circumstances as to why this development should be permitted. Some of the land in this area is prone to flooding. The land is well used for field sports.

Schools in the area are already heavily populated and the medical centre is working to capacity. The increased vehicles this development will bring will merely exacerbate the traffic problems in the area as no changes are proposed for the local feeder roads.

If this development should happen there will be no tangible break between the villages of Send and Ripley.

Additionally the four way junction for the A3 in this vicinity will bring more complications.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/449</th>
<th>Respondent: Janet Manktelow 8793025</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**MM27, MM41, MM42 and MM48 Transport Strategy**

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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/446</th>
<th>Respondent: Janet Manktelow 8793025</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**MM42**

The industrial development proposed at London Road at Burnt Common has increased dramatically. With no improvements proposed to the roads in the area this will be dangerous in the extreme.

The business and industrial increases proposed for Send ensure that there will be a bigger increase in our village than any other village in the Borough. This seems disproportionate and unfair.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/450</th>
<th>Respondent: Janet Manktelow 8793025</th>
<th>Agent:</th>
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</table>

**MM27, MM41, MM42 and MM48 Transport Strategy**

The traffic changes for this village are hideous. The situation of the 4 way junction will pile on the traffic nightmares for local people. No changes are planned to relieve congestion in the surrounding villages which already suffer congestion every day. The current A3 is blocked every morning and evening. Adding a four way junction will do nothing to relieve this situation. Any slight accident blocks within minutes and takes hours to clear.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM44 - LPMM18/447</th>
<th>Respondent: Janet Manktelow 8793025</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**MM44**

Land at Aldertons Farm, Send Marsh Road.

This proposed site for 129 houses on the land seems very strange as this site was deleted from the earlier draft following a vast amount of objection. This site is in one of the more historical parts of the village. It would detract from the surrounding heritage buildings on the nearby village green.
This site is on Green Belt land and there are again no extenuating or exceptional circumstances to permit development. Local infilling is a much better strategy.

**Attached documents:**

**Comment:** MM48 - LPMM18/451  **Respondent:** Janet Manktelow 8793025  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

The traffic changes for this village are hideous. The situation of the 4 way junction will pile on the traffic nightmares for local people. No changes are planned to relieve congestion in the surrounding villages which already suffer congestion every day. The current A3 is blocked every morning and evening. Adding a four way junction will do nothing to relieve this situation. Any slight accident blocks within minutes and takes hours to clear.

**Attached documents:**

**Comment:** MM2 - LPMM18/1364  **Respondent:** Mr Paul Tubman 8794529  **Agent:**

I do not understand why Guildford Borough Council is now making provision to increase housing to cover unmet needs from Woking Borough Council. Do Woking Borough Council make similar provision to cover any unmet needs from Guildford Borough Council?

**Attached documents:**

**Comment:** MM35 - LPMM18/1376  **Respondent:** Mr Paul Tubman 8794529  **Agent:**

The inclusion of this development at Gosden Hill Farm with the new expanded development at Burnt Common (MM42) and Garlick's Arch (MM41) will effectively connect the urban conurbation of Guildford with that of Burnt Common / Send Marsh and Send, removing much of the distinct local character of the area and going against Policy D1 item (6) in MM23. Send will no longer be a separate village but will be part of the Guildford conurbation.

**Attached documents:**

**Comment:** MM41 - LPMM18/1381  **Respondent:** Mr Paul Tubman 8794529  **Agent:**

The proposed increase of 37% in the number of houses in the Garlick's Arch development from 400 to 550 is excessive. This will further exacerbate the increased demands on the road infrastructure in the area, and put more pressure on the already stretched schools and medical facilities in the area.

This development together with the increased size of the Burnt Common development (MM42) and the proposed development at Gosden Hill Farm (Policy A25) will result in the Send becoming part of the extended Guildford
conurbation. This will change the local character of the area and goes directly against Policy D1 (6) in MM23 which states 'All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development.'

The total new housing proposed for Send when including Garlick's Arch, Winds Ridge (40), Clockbarn (60) and Alderton's Farm (120) (MM44) adds 770 houses to the 1700 currently in Send, increasing the total development by 45%. This is an unreasonable increase and the local traffic, educational and medical infrastructures will not be able to cope.

I object to this increased size of development at Garlick's Arch.

Attached documents:

Comment: MM42 - LPMM18/1382  Respondent: Mr Paul Tubman 8794529  Agent:

This latest increase in proposed size of this industrial estate makes this more than double the size of what was originally proposed. This is far larger than any other industrial allocated area in any other village in the borough, and further underlines the merging of the Guildford conurbation with Send. This development together with the increased size of the Burnt Common development (MM42) and the proposed development at Gosden Hill Farm (Policy A25) will result in Send & Send Marsh / Burnt Common becoming part of the extended Guildford conurbation. This will change the local character of the area and goes directly against Policy D1 (6) in MM23 which states 'All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development.'

This proposed increase in development size also goes against policy MM9 that states 'inappropriate development will not be permitted unless very special circumstances can be demonstrated.' No such special circumstances have been demonstrated here, particularly when Slyfield Industrial Estate has unused capacity.

The Employment Lands Needs Assessment shows a reduced demand for industrial land in the area which begs the question why is this increase being proposed?

I object to this amendment.

Attached documents:

Comment: MM44 - LPMM18/1385  Respondent: Mr Paul Tubman 8794529  Agent:

This proposed development supposedly takes advantage of the vague definition in MM9 of 'Limited infilling' being considered 'where it can be demonstrated that the site should be considered to be within the village.' This development is outside of the boundary of the village of Send Marsh / Burnt Common and there are no special circumstances shown as to why this development should be seen as an exception to the NPPF and its policies protecting the Green Belt. As a result there is no reason to change the boundary of the village of Send Marsh to accommodate this development.

Send Marsh village has much character centred around the Village Green and several heritage buildings surrounding the green. The close proximity and size of this proposed development will change the local character of the area and goes directly against Policy D1 (6) in MM23 which states 'All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting.'
Road infrastructure in the area going in all directions (Send Marsh Road towards Send and towards Portsmouth Road, and Polesden Lane) are already insufficient and unfit for current traffic levels. The addition of a further 120 homes on Send Marsh Road will create excessive problems on these roads, particularly Polesden Lane which is already a pinch-point.

The total new housing proposed for Send when including Garlick's Arch (550), Winds Ridge (40), Clockbarn (60) and Alderton's Farm adds 770 houses to the 1700 currently in Send, increasing the total development by 45%. This is an unreasonable increase and the local traffic, educational and medical infrastructures will not be able to cope.

I oppose this amendment to the Guildford Plan.

Attached documents:

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Comment: MM48 - LPMM18/1387  Respondent: Mr Paul Tubman 8794529  Agent:

It is not clear how this proposed development will help to cope with the additional transport pressures that will result from all of the new developments now proposed at Garlick's Arch, Burnt Common, Clockbarn and the Golden Hill Farm developments. Reliance on better access to / from the A3 is a fallacy as the A3 is gridlocked daily going both towards the M25 and towards Guildford. Local residents in both existing houses and the proposed new developments will resort to finding alternative routes through Send or Clandon exacerbating stress on the already pressured local road system. Something more fundamental than just a new traffic management scheme is required.

Attached documents:

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Comment: MM9 - LPMM18/1366  Respondent: Mr Paul Tubman 8794529  Agent:

There is insufficient definition given regarding 'Limited infilling' in Policy paras (1) to (4) as to 'where it can be demonstrated that the site should be considered to be within the village.' As currently written this is a very subjective definition and is open to interpretation. What are the minimum rules / standards that need to be satisfied before such a 'Limited infilling' could be considered?

Paragraph 4.3.25 suggests that 'There are a number of considerations to take account of when assessing whether a site is located within the village' and states that these include factors such as 'pattern of development, and the proposed development's relationship to the built up area of the village and the surrounding countryside.' What other factors are there? This is not clear, and leads on to the very subjective nature of this policy.

How can 'inappropriate development' be demonstrated versus the vague definitions given regarding what may be appropriate in terms of limited infilling? Is limited infilling regarded as 'very special circumstances', thereby making the development 'appropriate'?

Attached documents:

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Comment: MM9 - LPMM18/1368  Respondent: Mr Paul Tubman 8794529  Agent:
How can 'inappropriate development' be demonstrated versus the vague definitions given regarding what may be appropriate in terms of limited infilling? Is limited infilling regarded as 'very special circumstances', thereby making the development 'appropriate'?

Attached documents:

Comment: MM45 - LPMM18/395  
Respondent: Mrs Diana Delahoy 8794657  
Agent:

Facilities in Flexford area do not cope currently, so will be made worse by additional people and vehicles. For example, currently 3 week wait for GP appointment. Hogs Back is a traffic jam every weekday morning, and on travel reports every day. Addition of maybe about 400 extra people and vehicles will make this much worse.

Attached documents:

Comment: MM9 - LPMM18/394  
Respondent: Mrs Diana Delahoy 8794657  
Agent:

MM9 4 c) ii Limited Infilling at Flexford. Facilities such as GP surgery and roads are not coping with current population. It will be far worse if the population is increased by maybe about 400 people in new homes. Currently 3 week wait for a GP appointment. Currently Hogs Back is stationary every morning due to traffic volume (on travel reports every week day). The area cannot cope with more people or vehicles.

Attached documents:

Comment: MM2 - LPMM18/3052  
Respondent: Andrew Beckett 8794753  
Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that
the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points
made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West
Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest
terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg
through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the
north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of
a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the
A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of
listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in
the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of
congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was
pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the
Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which
could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem
viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and
East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving
speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size
    from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these
    North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways
    England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the
    A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This
    would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common,
    avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of
    Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The exit lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.
MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

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**Comment:** MM2 - LPMM18/3055  **Respondent:** Andrew Beckett 8794753  **Agent:**

MM2 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM2 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM2 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM2 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM2 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

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**Comment:** MM2 - LPMM18/3062  **Respondent:** Andrew Beckett 8794753  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:
Comment: MM3 - LPMM18/3053  Respondent: Andrew Beckett 8794753  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/3056  Respondent: Andrew Beckett 8794753  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/3057  Respondent: Andrew Beckett 8794753  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/3058  Respondent: Andrew Beckett 8794753  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

MM41 **Garlick's Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.
Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and request that their responses are registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. There remain brownfield development opportunities, especially in the town centre, that have not been fully or properly exploited;
   2. There is far too much reliance by the Council on purported A3 improvements which are beyond the council’s control and subject to modification and/or cancellation irrespective of the developments that may be undertaken based on such bare promises;
   3. The town centre policy, S3, is inadequate and does not address the infrastructure deficit; and
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’ as required by the NPPF.

1. I request that the Inspector RE-EXAMINES the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt;
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number on which the Local Plan is predicated is excessive; and
   3. Guildford Borough Council has failed adequately to notify or consult on its proposed changes, by comparison with the widely communicated consultation of the original version of the proposed Local Plan.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

   The A247

   The A247 is a minor A road that was so-classified many years ago before traffic loads, vehicle sizes and axle loads were anywhere near the specifications of the current day. As such, the current designation of the A247 is unsuitable to cope with the existing traffic requirements, let alone any increase as would be generated by the proposed developments according to the modified Local Plan. In short, the A247 IS NOT FIT FOR USE AS AN A ROAD AS IT STANDS, AND MOST CERTAINLY CANNOT WITHSTAND ANY SIGNIFICANT INCREASE IN TRAFFIC FLOWS.

   I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send, which is simply unsustainable. In the previous consultation, the Clandon Society, myself and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

   The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g., through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

   I welcome the recognition provided in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, recognition of the problem is merely wind if not coupled with well-considered and adequately funded provision for mitigating such problems. The suggested £1 million of developer-funded mitigation measures for the A247 through West Clandon, which may or may not be enforceable, will not change the fact that the A247 through West Clandon does not have the capacity, nor physical characteristics, to deal with the increase in traffic that will be generated by the proposed developments.

   The capacity of the existing road cannot realistically be increased because of existing physical constraints including the close proximity to the road of listed structures and other buildings and the limited width available.
The road is already too busy to cross on foot at times during the morning peak, creating problems in accessing the station. In a few years’ time, if the proposed developments proceed, the traffic will become nose-to-tail heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements, leading to near misses with pedestrians and frequent accidents with vehicles, as have been notified previously by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative, modern A road classified route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could properly divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge and it is already the intention to build a station next to the bridge. This would seem to be a far preferable and achievable solution to the likely over-capacity of the A247.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic;
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247;
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh;
4. The development of 1800 houses at Gosden Hill;
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247;
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3;
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing;
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford;
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments; and
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e., through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway);
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still frequently in excess of 30mph;
3. The dangerous junction with the station roads and Oak Grange Road, where the exit sight lines to the North and/or South are limited by the hump and parapet of the bridge over the railway and are the locations of frequent near misses such that it is only a matter of time before a serious accident occurs. The visibility of traffic emerging from the station roads and Oak Grange Road is also poor for traffic approaching the bridge from the North or South, respectively, because of the hump. It was for these reasons, among others, that Surrey County...
Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station. In addition, particularly out of peak traffic periods, traffic speeds frequently far exceed the designated 30mph limit;

4. The sight lines for the exit of the Onslow Arms car park;
5. The narrowness of the road near Summers;
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement and/or causing near misses of even clashes of wing mirrors;
7. The sharp bend near Clandon Regis;
8. The narrowness of the road at the Bull’s Head;
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school;
10. The sharp bend with poor sight lines in either direction at the church;
11. No continuous footpath through the length of the village;
12. The frequently over-limit speed of traffic; and
13. The classification as an A-road without it having the capability of an A-road, rather a B-road at best.

### Housing Number and the Green Belt

- The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.
- The Council has long argued that much of the housing required must be built on such sites.
- This argument is not supported either by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
- The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
- Coupled with modal shift, these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

#### 1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

**MM2:** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

**MM2:** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

**MM2:** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

**MM2:** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

**MM2:** Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

### Attached documents:

**Comment:** MM23 - LPMM18/4829  **Respondent:** Richard Edwin 8794945  **Agent:**
MM23: In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23: (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23: Promotion of **green approaches** should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23: If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23: should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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**Comment: MM23 - LPMM18/4836  Respondent: Richard Edwin 8794945  Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is entirely unsound and should be re-examined, reconsidered and amended to take into account a sprinkling of common sense.

**Attached documents:**

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**Comment: MM3 - LPMM18/4827  Respondent: Richard Edwin 8794945  Agent:**

MM3: In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3: There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3.Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/4830  Respondent: Richard Edwin 8794945  Agent:

MM31: on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31: A height limit for North Street is required.

MM31: There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4831  Respondent: Richard Edwin 8794945  Agent:

MM32: A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4832  Respondent: Richard Edwin 8794945  Agent:

MM33: should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/4833  Respondent: Richard Edwin 8794945  Agent:

MM35: Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35: Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35: If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/4834  Respondent: Richard Edwin 8794945  Agent:

MM41: Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/4835  Respondent: Richard Edwin 8794945  Agent:

MM44: The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/4828  Respondent: Richard Edwin 8794945  Agent:

MM9: In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM40 - LPMM18/22  Respondent: Steven Whitaker 8795361  Agent:

I am writing regarding the modifications to the Local Plan and wish to object to the inclusion of the Wisley airstrip as an area for future development. As you are aware, this site was recently subject to a planning application in which all the pros and cons of developing the land were thoroughly reviewed by the Council and later by a government inspector. The outcome was that the site was considered unsuitable for a development of the scale suggested by the Council in its Local Plan. The site should therefore be removed from the Local Plan. A development comprising 2000 homes will have a huge negative impact on the surrounding area, our local services and infrastructure. Please re-consider.

Attached documents:

Comment: MM2 - LPMM18/1681  Respondent: Robert Taylor 8795553  Agent:
GBC Local Plan: Comments on modifications  20.10.18

This e-mail comments on a number of modifications to policies proposed in the latest revised version of the Guildford Local Plan.

1. Policy S2, Spatial Development Strategy: Modification MM2

I have previously argued that the proposed housing numbers in the Local Plan were excessively high, since they were based upon population and household projections that had been inflated due to a period of very high immigration. With Brexit now in prospect the official ONS projections are being reduced substantially with each subsequent revision. As the recent analysis presented by Mr John McDonald has convincingly and authoritatively set out, the latest official numbers now available means that the housing need projections used in the latest Policy S2 must be revised down even further and by a significant margin. This will allow Guildford to establish a more ‘normal’ growth plan for its housing which does not put undue strain on existing communities or their supporting infrastructure.

If necessary, and in order to follow due process, GBC should re-open the Local Plan examination to allow the latest ONS numbers to be used for establishing its housing need projections.

As currently proposed, I OBJECT to the housing targets as set out in Modification MM2.

Attached documents:

Comment: MM23 - LPMM18/1683  Respondent: Robert Taylor 8795553  Agent:

2. Policy D1, Place shaping: Modification MM23

Paragraph 7 of Modification MM23 allows development on strategic sites in the borough to propose patterns of development which are not in character with their surrounding neighbourhoods – which is contrary to the policy set out in Paragraph 6 immediately before it. I do not support Paragraph 7. In my opinion it is vital that new settlements should be in keeping with the character of their areas. If not, we will see concrete jungles sprouting up in the middle of long-established rural communities.

Accordingly, I OBJECT to Modification MM23 Paragraph 7.

Attached documents:

Comment: MM40 - LPMM18/1684  Respondent: Robert Taylor 8795553  Agent:

3. Site Policy A35, the former Wisley airfield

In June 2018 the Secretary of State refused the appeal of the site owner to develop this site with a new settlement of 2000+ homes. His reasons for refusing planning permission were clear and strong. Yet GBC have still retained this site within the Local Plan. I am incredulous by GBC’s approach. The case for removing this site from the local plan is clear and overwhelming. In summary:

1. The site is unsustainable, with the worse sustainability rating of any in the Local Plan;
2. The site is wholly dependent upon major infrastructure projects whose deliverability is very uncertain;
3. The site fails the Exceptional Circumstances test needed for Green Belt release;
4. Development of a new settlement will have major ecological consequences;
5. The site will have – in the words of the appeal inspector – a ‘catastrophic’ impact on the character of the existing Ockham community;
6. The site is not needed within the Local Plan for it to meet the assessed housing needs of the borough.

On this basis GBC should take the decision to remove this site from the Local Plan.

Accordingly, I OBJECT to Site Policy A35 and request that it is removed from the Local Plan.

Attached documents:

Comment: MM9 - LPMM18/1682  Respondent: Robert Taylor 8795553  Agent:

2. Policy P2, Green Belt: Modification MM9

Policy P2 is still proposing the insetting of East Horsley from the Green Belt, despite all of the evidence presented during the examination to show that the justification put forward by GBC for this insetting is flawed. As set out in the submission of East Horsley parish council, the Pegasus Green Belt & Countryside Study contains many errors in the analysis presented to justify the insetting of East Horsley. This should have lead GBC to remove this policy from the Local Plan. I am mystified as to why GBC retains this policy within the plan.

Accordingly, I OBJECT to the insetting of East Horsley as proposed in Policy P2.

Attached documents:

Comment: MM2 - LPMM18/2508  Respondent: Nick Etches 8796321  Agent:

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and should like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited;
2. There is too much reliance on A3 improvements and these are beyond the council’s control;
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit;
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There have been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt;
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247. The only road through East Clandon, “The Street”, is extremely narrow and totally unsuitable for heavy traffic, particularly outside my house where there is frequently a blockage requiring traffic to reverse, and indeed there have been numerous accidents.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
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7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common,
avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
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10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

In addition to the above, there is the significant probability that southbound traffic seeking to avoid congestion on the A247 will divert via Tithebarns Lane and turn right at the dangerous and completely blind junction with Hungry Hill Lane / Ripley Road towards East Clandon, thus increasing traffic through East Clandon which as noted is totally unsuited to heavy traffic. I have previously requested Surrey Council to remedy this dangerous junction but no action has been taken.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.
E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

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MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2510  Respondent: Nick Etches 8796321  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

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MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined

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Comment: MM3 - LPMM18/2509  Respondent: Nick Etches 8796321  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.
MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

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MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/2511  Respondent: Nick Etches 8796321  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2512  Respondent: Nick Etches 8796321  Agent:

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Attached documents:

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MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB
Comment: MM35 - LPMM18/2514  Respondent: Nick Etches 8796321  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Comment: MM41 - LPMM18/2515  Respondent: Nick Etches 8796321  Agent:

MM41 Garlick's Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Comment: MM44 - LPMM18/2516  Respondent: Nick Etches 8796321  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Comment: MM13 - LPMM18/3213  Respondent: Sally Erhardt 8796481  Agent:

4. MM13 There is too much retail space proposed, this must be based on out of date information.

Comment: MM23 - LPMM18/3214  Respondent: Sally Erhardt 8796481  Agent:
MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority

Attached documents:

Comment: MM3 - LPMM18/3212 Respondent: Sally Erhardt 8796481 Agent:

The Local Plan is Unsound

I would suggest that the Local Plan is unsound because of the following, and should be re-examined:

1. MM2. The latest ONS figures and projections make the proposed housing number invalid, as a result the public hearings should be reopened, and the figures re-evaluated. The same would go for Woking and result in a far lower figure, however there should no requirement for Guildford to take on the unmet numbers from Woking.

2. There are many brownfield Sites in the centre of Guildford that have not been considered or used efficiently. This has resulted in the proposed development of far too much green belt and should not be approved.

3. The exceptional circumstances to develop the green belt do not add up and should be re-examined.

4. There are no guarantees regarding the improvements to the A3 which is critical to the developments.

Problems with the Main Modified Plan

1. MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

2. MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

3. MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM40 - LPMM18/3215 Respondent: Sally Erhardt 8796481 Agent:

Local problems

MM40 Wisley should be retained as Green Belt and removed from the Plan. Revised housing figures weaken the justification for development. All the reasons it was turned down by the inspector are still valid.

Attached documents:

Comment: MM41 - LPMM18/3216 Respondent: Sally Erhardt 8796481 Agent:
Similarly MM41 Garlick’s Arch should be retained as Green Belt in view of revised housing need rather than being expanded.

Nothing should be built without the infrastructure already in place.

I do hope I have written this in a way that will mean my points are considered.

Attached documents:

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Comment: MM25 - LPMM18/45  
Respondent: Surrey County Council (Mr. Tony Howe) 8798721  
Agent:

The NPPF requires that Local Plans should set out a "positive strategy for the conservation and enjoyment of the historic environment" (para 185). The proposed modification reduces the positive conservation vision set out in the local plan and effectively proposes a case-by-case consideration of impact on heritage significance, rather than a strategic approach.

More importantly, the reliance the proposed modification places on "case law, legislation and the NPPF" ignores the ongoing development of professional approaches to heritage conservation, which evolve as greater understanding of the resource is achieved. Case law precedents in particular might be significantly outdated, especially when considering heritage assets such as historic landscapes, parks, gardens or 19th-20th century sites, which are relatively recent additions to the list of what we consider to be "heritage assets" and the where methodology for assessing character, significance and importance is still being refined. At the very least, the schedule of considerations in assessing the impact of development proposals upon heritage significance should include reference to "current professional standards and guidance" in addition to those given above.

The monitoring indicator will be difficult to implement. It does not define "loss", and "harm" is a subjective consideration. Excavating an archaeological site might be considered a "loss" by some due to its physical removal, but the resulting acquisition of hitherto unknown data about the site and historic environment of the borough could be considered to offset this, meaning a net result of "no harm". A demolition of an extension to a listed building might be considered a "partial loss", but if the extension has no significance then there is no concern. A more pragmatic and manageable monitoring indicator might be to catalogue the number of planning applications that involved impacts on heritage assets (buildings and archaeology) against the number where programmes of management and mitigation were successfully and satisfactorily completed and discharged.

Attached documents:

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Comment: MM2 - LPMM18/3088  
Respondent: David Williams 8798849  
Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**
MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/3091  Respondent: David Williams 8798849  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/3098  Respondent: David Williams 8798849  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.
The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment: MM3 - LPMM18/3089  Respondent: David Williams 8798849  Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

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**Comment: MM31 - LPMM18/3092  Respondent: David Williams 8798849  Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment: MM32 - LPMM18/3093  Respondent: David Williams 8798849  Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**
Comment: MM33 - LPMM18/3094  Respondent: David Williams 8798849  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/3095  Respondent: David Williams 8798849  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/3096  Respondent: David Williams 8798849  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/3097  Respondent: David Williams 8798849  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/3090  Respondent: David Williams 8798849  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Comment: MM2 - LPMM18/4051  

Respondent: H L Cousins 8798881  

Agent:

Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3. New figures and projections for housing numbers have recently been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I note the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic. For the sake of the safety of village residents (including school children) I believe that the village should have a 20 mph speed limit to slow the traffic down. For that reason, additional traffic should not be encouraged to use the A247. However, sadly, that seems to be an inevitable effect of the latest Plan.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which
could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

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I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
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4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
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7. The sharp bend near Clandon Regis
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10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
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13. The classification as an A-road without it having the capability of an A-road.
Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

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Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

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MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/4054 **Respondent:** H L Cousins 8798881 **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

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MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.
MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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**Comment:** MM23 - LPMM18/4060  **Respondent:** H L Cousins 8798881  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM3 - LPMM18/4052  **Respondent:** H L Cousins 8798881  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

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   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

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**Attached documents:**

---

Comment: MM31 - LPMM18/4055  Respondent: H L Cousins 8798881  Agent:
MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

---

**Comment:** MM33 - LPMM18/4056  **Respondent:** H L Cousins 8798881  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

---

**Comment:** MM35 - LPMM18/4057  **Respondent:** H L Cousins 8798881  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/4058  **Respondent:** H L Cousins 8798881  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment:** MM44 - LPMM18/4059  **Respondent:** H L Cousins 8798881  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.
Comment: MM9 - LPMM18/4053  Respondent: H L Cousins 8798881  Agent:

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Comment: MM2 - LPMM18/4277  Respondent: Bill Taylor 8800545  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole. I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited 2. There is too much reliance on A3 improvements and these are beyond the council’s control 3. The town centre policy, S3, is inadequate and does not address the infrastructure deficit 4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt 2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share The A247

I live on the A247 and am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring **additional pressure on this road**, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.
I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because: 1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic 2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247 3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh 4. The development of 1800 houses at Gosden Hill 5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247. 6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3 7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 north bound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing 8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. 9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments 10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are: 1. The junction with the current A3 south-bound slip road (modifications are underway) 2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph 3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station. 4. The sight lines for the exit of the Onslow Arms car park 5. The narrowness of the road near Summers 6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement 7. The sharp bend near Clandon Regis 8. The narrowness of the road at the Bull’s Head Public House 9. The Clandon Junior School and the, in places, narrow footpath for children walking to school 10. The sharp bend with poor sight lines in either direction at the church in West Clandon 11. No continuous footpath through the length of the village 12. The speed of traffic 13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of
the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker. The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss. MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination. MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure e.g. excessive student homes in town, low economic participation. MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined. MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/4282  Respondent: Bill Taylor 8800545  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4288  Respondent: Bill Taylor 8800545  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is currently unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/4279  Respondent: Bill Taylor 8800545  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected

F. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/4283  Respondent: Bill Taylor 8800545  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

Attached documents:

Comment: MM33 - LPMM18/4284  Respondent: Bill Taylor 8800545  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:
Comment: MM35 - LPMM18/4285  
**Respondent:** Bill Taylor 8800545  
**Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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Comment: MM41 - LPMM18/4286  
**Respondent:** Bill Taylor 8800545  
**Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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Comment: MM44 - LPMM18/4287  
**Respondent:** Bill Taylor 8800545  
**Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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Comment: MM9 - LPMM18/4280  
**Respondent:** Bill Taylor 8800545  
**Agent:**

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**Attached documents:**

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Comment: MM2 - LPMM18/4586  
**Respondent:** Charlotte Edwards 8801665  
**Agent:**

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I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society and would like their responses to be registered as mine as well.**
1. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**

2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited

3. There is too much reliance on A3 improvements and these are beyond the council’s control

4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit

5. The grounds for Green Belt development are inadequate and do not fulfill the criteria for ‘exceptional circumstances’.

1. **I would like the Inspector to RE-EXAMINE the Local Plan because:**

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In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by that organisation in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

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What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

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3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
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8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
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5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
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13. The classification as an A-road without it having the capability of an A-road.

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This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment: MM2 - LPMM18/1361  Respondent: Penny Panman 8802369  Agent:**

I am very concerned that the proposed number of houses is wrong. The new ONS figures have reduced the projected growth in households to 6,635, which is a 40.5% reduction. The implications of largescale building are so huge that I believe it is essential to start with an accurate forecast and not the current one in this local plan. We need houses and should begin the process honestly and with integrity, not using out-of-date or random figures.

**Attached documents:**

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**Comment: MM3 - LPMM18/1362  Respondent: Penny Panman 8802369  Agent:**

Because the projected number of houses has fallen by 40% according to the recent ONS data, I believe that the exceptional circumstances required by law to build on the Green Belt no longer exist.

A better and more precise policy for the use of Guildford town centre now needs to be devised: the vague one in this local plan is not fit for purpose.

**Attached documents:**

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**Comment: MM40 - LPMM18/1363  Respondent: Penny Panman 8802369  Agent:**

I strongly object to the former Wisley Airfield still being included in this local plan, despite the projected number of houses required (according to the ONS) having fallen by 40% and despite the site having been confirmed unsuitable for large scale development by the Secretary of State in June 2018.

**Attached documents:**

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**Comment: MM41 - LPMM18/4589  Respondent: Timothy Bruton 8803617  Agent:**
I further object to the modifications as I think they will cause a dangerous increase in traffic. Neither the Alderton’s Farm site (MM44) and Garlick’s Arch (MM41) have good public transport or cycle paths and the pavements along Send Marsh Rd are very narrow so there would be an inevitable increase in the number of car journey’s to and from these sites. The Alderton’s Farm site had previously been rejected as unsuitable.

Furthermore for Garlick’s Arch there are no amenities planned for this site and there is only a convenience store and a farm shop some distance away requiring car journeys
Send school is on the A247 and there are already safety concerns about parking and children crossing the road so extra traffic would increase this danger

I also object to the allocation of industrial premises Burnt Common. This site has been previously rejected as unsuitable by GBC.

To exit this site it is necessary to go South along the Old London Rd (B2215) and the to turn right along a narrow strip then right again onto the north bound slip road off the A3. This is presently very dangerous as traffic leaving the A3 have very little time to see and slow down for lorries leaving the distribution centre and crossing on to the north bound A3 slip road. Extending the site would make this an even more dangerous hazard.

Attached documents:

**Comment:** MM44 - LPMM18/4588  **Respondent:** Timothy Bruton 8803617  **Agent:**

I would like to register my opposition to the latest modifications of the Guildford Local Plan which are relevant to Send. In particular I object to development at the site at Alderton’s Farm (MM44). This is a valuable green area which is an important part of the rural character of the village of Send and housing here would destroy this important area. In addition houses on this site would lead to further congestion at busy times of day at either end of Send Marsh Rd (B368) where it either joins the Portsmouth Rd (B2215) or the already congested A247 at May’s Corner.

I further object to the modifications as I think they will cause a dangerous increase in traffic. Neither the Alderton’s Farm site (MM44) and Garlick’s Arch (MM41) have good public transport or cycle paths and the pavements along Send Marsh Rd are very narrow so there would be an inevitable increase in the number of car journey’s to and from these sites. The Alderton’s Farm site had previously been rejected as unsuitable.

Furthermore these additional houses would put extra pressure on the already busy medical centre and the school which is a new build and is already full.

The Office of National Statistics’ prediction is that there is a decrease in the previously anticipated number of houses needed in Guildford and this has important consequences for the proposed developments in Send. The Local Plan modification will enable increase in housing in Send over and above those in the original Local Plan proposal. These new ONS figures make it unnecessary to plan in extra housing in Send.

Attached documents:

**Comment:** MM27 - LPMM18/954  **Respondent:** Wellesley Theodore Wallace 8803841  **Agent:**

Policy A25 : Gosden Hill Farm (MM27) (MM48)
Under Opportunities (6), Policy A25 refers to "land on-site which would form part of the future route of a connector road to the B2215 London Road/ A247 Clandon Road, and so realise an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road ". This Opportunity is connected with Requirement (2).

The A247 intersects the B2215 at Burnt Common roundabout, which is over a mile from the point at which the B2215 joins the A3 (see the plans on pages 259 and 397 both of which show Site 58).

No explanation is given as to how such an "all movements junction" could be effected. Opportunity (6) appears to envisage three separate junctions covering well over a mile including a connector road rather than "an all movements junction" in the singular. At present the B2215 connects the A247 at Burnt Common with the A3 and the A3100. The plan at page 205 is misleading since it gives the impression that it is neither possible to access the A3 going south from the B2215 nor to access the A3 going north from the A3100, the A3 being dual carriageway. An all movements junction would involve access to the A3 in both directions or two separate junctions. Opportunity (3) provides for a potential diversion of the B2234 Merrow Lane to form a direct link to the A3 at "the improved junction" which must refer to Requirement (1)

Inevitably a material proportion of traffic from Site 25 will go north to the Burnt Common roundabout and part of that traffic will go south down the A247 which is already heavily trafficked.

Opportunity (6) should be amended to delete the references to the A247 Clandon Road and to clarify whether a single junction is envisaged or more than one. The inclusion of the A247 in a single junction is wholly unrealistic given the distance of a mile between the Burnt Common roundabout and Site 25 and still more from the A3100. SRN4 and LRN6 provide no clarification. The inevitable inference is that the traffic impacts of the development on Site A25 have not been adequately considered.

Policy A25 does not meet the requirements of paragraph 154 of the NPPF.

Attached documents:

Comment: MM35 - LPMM18/955  Respondent: Wellesley Theodore Wallace 8803841  Agent:

Policy A25 : Gosden Hill Farm (MM27) (MM48)

Under Opportunities (6), Policy A25 refers to "land on-site which would form part of the future route of a connector road to the B2215 London Road/ A247 Clandon Road, and so realise an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road ". This Opportunity is connected with Requirement (2).

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Policy A25 does not meet the requirements of paragraph 154 of the NPPF.

**Attached documents:**

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**Comment:** MM41 - LPMM18/948  **Respondent:** Wellesley Theodore Wallace 8803841  **Agent:**

**Policy A43 : Land at Garlick’s Arch (MM 41)(MM 42)(MM 48)**

The allocation for homes should not be increased from 400 to 550; even 400 homes is excessive. The additional allocation fails to pay proper regard to paragraph 154 of the NPPF and to ID3(1), (2)(c) and (7).

Requirement (Oe) under "Transport Strategy" recognises "the otherwise adverse material impacts on communities and the environment including in … West Clandon". This clearly refers to traffic on the A247. The Response of Surrey County Council ("SCC") to the 2014 Draft Plan included "the A247 is a very heavily trafficked A class road and carries a very heavy proportion of HGVs". This is significant coming from the Highway Authority. The current level of traffic including HGVs has certainly not lessened since 2014.

The additional traffic resulting from 150 more homes on Site 43 can only accentuate the "adverse material impacts", particularly in view of the commercial and goods traffic generated under Policy 58 which specifically refers to "storage and distribution". It is inevitable that a material proportion of the additional traffic will travel south along the A247, if only to avoid the junction of the A3 with the M25 and the M25 itself.

The Assessment by MK of Transport Impacts at para 2.3 forecast that the additional housing at Garlick’s Arch would result in 24 additional movements in the AM peak hour and an additional 25 in the PM peak hour and stated, "Additional mitigation may be required on the local road network where the impact will be at its highest." The forecast of only 24 or 25 additional movements at the peak hours generated by 150 additional homes seems remarkably low.

Requirement (Od) specifies a "contribution towards an off-site walking and cycle network to the village centre of Send, the Burnt Common Warehouse site and Clandon railway station".

Traffic management and environmental improvement on the A247 are also covered at Infrastructure Project LRN 26 to be delivered by SCC with the likely cost of £1m to be developer funded. There is no detail of what traffic management or mitigation is envisaged. It is not clear whether separate cycle lanes would be required in each direction or whether cycle lanes would be shared with pedestrians. It is difficult to see what traffic management or mitigation is practicable or indeed possible, particularly on Clandon Road and The Street.

The A247 is clearly not wide enough to accommodate even one cycle lane and road widening would involve extensive compulsory purchases, since, apart from the field between the bridge over the A3 and Green Lane, there is housing on both sides of the road. It would also involve felling many fine trees which contribute greatly to the character of West Clandon all of which is in the Green Belt. Most of the A247 only has a footpath on one side of the road, often quite narrow. When walking from the A43 site to the station it is necessary to cross the A247 four times.

The requirements at (Od) and (Oe) are devoid of any effect because the are in practice incapable of being met and therefore they do not comply with ID3(1),(2)(c) and (7).
Paragraph 154 of the NPPF states that Local Plans should be realistic. It includes the following, "Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan". Policy A43 does not meet this requirement. ID3(10) is not sufficient.

The Statement of Common Ground dated 3 July 2018 signed on behalf of the Council and the developers during the public examination states at paragraph 10 that Site 43 "can be accessed by sustainable modes of transport including a well-established pedestrian network that incorporates pedestrian crossings on key desire lines" and bus routes 462/463 which follow routes incorporating Clandon Station. In fact there are no crossings at all between Site 43 and Clandon Station; further, since 1 September 2018 there have been no Sunday buses and during the week there are only seven buses daily arriving at the station from Burnt Common, the earliest being at 0759 and the last at 1857, and only five buses daily passing the station towards Burnt Common, the earliest being at 1005 and the last being at 1740; these buses are at intervals of at least two hours. SCC observed in 2014 that there was "a very limited bus route" along the A247. Although the September 2018 version of the Local Plan lists under "Opportunities" at (3) "improve bus frequency", any improvement would have to be dramatic to merit the description "sustainable mode of transport".

Attached documents:

Comment: MM42 - LPMM18/950  Respondent: Wellesley Theodore Wallace 8803841  Agent:

Policy A43 : Land at Garlick’s Arch (MM 41)(MM 42)(MM 48)

The allocation for homes should not be increased from 400 to 550; even 400 homes is excessive. The additional allocation fails to pay proper regard to paragraph 154 of the NPPF and to ID3(1), (2)(c) and (7).

Requirement (Oe) under "Transport Strategy" recognises "the otherwise adverse material impacts on communities and the environment including in ... West Clandon". This clearly refers to traffic on the A247. The Response of Surrey County Council ("SCC") to the 2014 Draft Plan included "the A247 is a very heavily trafficked A class road and carries a very heavy proportion of HGVs". This is significant coming from the Highway Authority. The current level of traffic including HGVs has certainly not lessened since 2014.

The additional traffic resulting from 150 more homes on Site 43 can only accentuate the "adverse material impacts", particularly in view of the commercial and goods traffic generated under Policy 58 which specifically refers to "storage and distribution". It is inevitable that a material proportion of the additional traffic will travel south along the A247, if only to avoid the junction of the A3 with the M25 and the M25 itself.

The Assessment by MK of Transport Impacts at para 2.3 forecast that the additional housing at Garlick’s Arch would result in 24 additional movements in the AM peak hour and an additional 25 in the PM peak hour and stated, "Additional mitigation may be required on the local road network where the impact will be at its highest." The forecast of only 24 or 25 additional movements at the peak hours generated by 150 additional homes seems remarkably low.

Requirement (Od) specifies a "contribution towards an off-site walking and cycle network to the village centre of Send, the Burnt Common Warehouse site and Clandon railway station".

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Policy A58 – Land around Burnt Common Warehouse (MM42) (MM48)

The allocation for either or a mix of light industrial, general industrial and storage and distribution should not be increased to a minimum of 14,800 sq m. The goods traffic generated would add to the adverse material impact on the A247 in Send and West Clandon.

The Transport Strategy Requirements at (Ob) and (Oc) fail to pay proper regard to ID3(1), (2)(c) and (7) .The Requirements are too imprecise and either impossible to meet or impracticable and are therefore devoid of effect. Off-site walking and cycle networks under (Ob) could only be via the Burnt Common roundabout; it is impossible to see how this could be achieved safely at the roundabout; further, on the stretch of the A247 between the roundabout and the bridge over the A3 there is no scope for a cycle path and the only footpath is on the Ripley side of the road.

Policy A58 does not meet the requirements of paragraph 154 of the NPPF which includes the word "clear" twice.

Attached documents:

Comment: MM44 - LPMM18/956 Respondent: Wellesley Theodore Wallace 8803841 Agent:
Comment: MM48 - LPMM18/953  Respondent: Wellesley Theodore Wallace 8803841  Agent:

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Policy A58 does not meet the requirements of paragraph 154 of the NPPF which includes the word "clear" twice.

Policy A63: Land west of Alderton’s Farm, Send Marsh Road (MM 44)(MM48)

This land is in fact east of Alderton’s Farm not west. The road runs from May’s Corner, Send, where it joins the A247, to the B2215 Portsmouth Road opposite ancient woodland which is part of Site 43 and nearly opposite Kiln Road which borders Site 43.

The traffic generated by 120 homes will undoubtedly impact traffic on the A247 in Send and West Clandon as well as Ripley. There are already traffic lights at May’s Corner. Far from contributing to the delivery of an integrated accessible and safe transport system, it would do the reverse.

The geographical misdescription of the location of the site indicates the lack of adequate consideration given to this allocation, Policy A63 should be deleted.

Policy A43: Land at Garlick’s Arch (MM 41)(MM 42)(MM 48)

The allocation for homes should not be increased from 400 to 550; even 400 homes is excessive. The additional allocation fails to pay proper regard to paragraph 154 of the NPPF and to ID3(1), (2)(c) and (7).

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Attached documents:

Comment: MM13 - LPMM18/5608  Respondent: David Scotland 8803969  Agent:

• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

Comment: MM2 - LPMM18/5605  Respondent: David Scotland 8803969  Agent:

I have not been advised of this consultation (despite being advised previously by email) and only heard of it by my neighbours. Why have you stopped informing me?

I fully support the representation made by Wisley Action Group and their legal team. In particular, their observations that:
• MM2 The housing target is wrong.

• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.

• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/5610  Respondent: David Scotland 8803969  Agent:

• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – (this makes it easier for developers)

• Strategic sites are to be exempt from design constraints (which will result in developments such as that proposed on Three Farm Meadows)

• There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/5611  Respondent: David Scotland 8803969  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/5612  Respondent: David Scotland 8803969  Agent:

SITE SPECIFIC – A35 – Three Farms Meadows

• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR

• Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB

• MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.

• The biodiversity of the SNCI will be destroyed by the proposed development.
• An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Attached documents:

Comment: MM41 - LPMM18/5609  Respondent: David Scotland 8803969  Agent:

• MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].

• There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM9 - LPMM18/5607  Respondent: David Scotland 8803969  Agent:

• MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM2 - LPMM18/4953  Respondent: Brian Yeomans 8804833  Agent:

MM2 - there is a strong case for taking out a strategic site and more scope for better town centre provision. This makes table (S2), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 - independent expert, Neil MacDonald, has demonstrated that 360 homes per year would support the ambitious economic growth rate proposed by the Inspector. 630 homes a year is out of step with the new ONS figures and the Government's new standard methodology. 630 is based on inappropriate assumptions that inflate the figures due to excessive allowance for student homes and their low economic participation.

MM2 - it is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained. The number of houses needed in Woking has also been reduced and has also not been re-examined.

Attached documents:

Comment: MM42 - LPMM18/4952  Respondent: Brian Yeomans 8804833  Agent:

MM2 - policy S2. The examination should be re-opened because the housing figures should be revised in the light of the new ONS forecasts of population and households. The stated housing requirement is not a sound basis for the Local Plan or justification for such an extensive loss of Green Belt land
Comment: MM43 - LPMM18/4958  Respondent: Brian Yeomans 8804833  Agent:

MM43 - Hornhatch Farm, Chilworth. As set out in MM2 above the much lower projection of housing needs removes the necessity to bite into the Green Belt and the development of this site.

Comment: MM45 - LPMM18/444  Respondent: Mr Roger Mitchell 8805089  Agent:

Policy A64, Land between Glaziers Lane and Strawberry Farm, Flexford

I wish to object to the inclusion of Site 64 in GBC’s proposed revised version of its Local Plan for the following reasons:

1/ It involves moving an important tract of land out of the Green Belt. This Green Belt land is important in defining the rural character of this part of the borough and is a bulwark against urban sprawl.

2/ There are no exceptional circumstances which would justify removing this site from the Green Belt.

3/ This proposal has not been put to the residents for consideration in earlier drafts of the plan and seems to have been plucked randomly from thin air.

4/ There is no infrastructure to sustain this proposed development: surrounding roads are effectively country lanes and are already over-congested; Water tables are high and local drainage inadequate to cope with even the existing rain and waste water and effluent; local shops do not exist and local health and school provision are overstretched.

Comment: MM2 - LPMM18/2016  Respondent: Peter Warburton 8805249  Agent:

I object to the main modifications to the Local Plan for the following reasons:

MM2 – The housing target does not use the latest ONS population figures and household formations statistics.

I call for the hearing to be reopened so that the latest ONS figures and household projections can be taken into account.

Comment: MM40 - LPMM18/2018  Respondent: Peter Warburton 8805249  Agent:
A35 – Three Farms Meadows

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR.

- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.

Attached documents:

Comment: MM41 - LPMM18/2017  Respondent: Peter Warburton 8805249  Agent:

MM41 – The transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years. This will impact all development that relies on this scheme.

Attached documents:

Comment: MM2 - LPMM18/6096  Respondent: Alena Thomas 8805633  Agent:

It is a third time I am writing regarding GBC plan and my general feeling is that by now the plan has moved on from bad for the village, surrounding areas, residents, Green Belt to plain nasty towards the village of Send. My feeling and the feeling of people I talk to is distrust and dismay, all this will inevitably jeopardise the trust we put in our executive elected bodies.

I live in Send, my children go to school in Woking and nursery in Horsley. In 2011 I moved from London to escape pollution and congestion. I work in Slough and use M25 and I am constantly on the run to pick up, drop off and get to and from work. I know the roads, I know first hand that it is impossible to get on M25 from Ripley bypass in less than 20 min at 7.20 in the morning. I also worked at Royal Surrey Hospital in 2015 which is on A3 down south from us and it is equally congested in the morning, especially around Guildford. So all these houses that you are eager to build in Send, some 750 of them will each have 2 cars= 1500 extra cars in the morning will join the standstill?

Please, whoever you are, come and join me in the morning on my way to work.

My general objections to the massive burden of development proposed for the area have not changed and I will set them out in brief below before getting more specific about the latest round of proposed actions.

1. I am informed that a respected consultancy called Barton Willmore estimates the annual housing need for Guildford Borough at 431, not much over half the number being used by GBC (789). September data from the ONS suggests that a figure of 460 is accurate, very close to the Barton Willmore figure. In the light of these facts, please reconsider POLICY S2 and the implications for what is needed in Send.

The analysis of ‘need’ for housing in the Borough as a whole is fundamentally flawed, based on a combination of flimsy survey evidence and the misinterpretation of this and other indicators, some of it by consultants lacking an understanding of the area( student population counted as permanent to inflate the “need”); and on national-level generalisations about growth of housing demand. Previous objections by myself and others have gone into more detail on this view, and the fact of local and central government both trying to justify the policy by saying the other is insisting on it and they don’t really want it and are trying to fight on the residents’ side, speaks volumes.

Attached documents:
MM27 MM41 MM42 and MM48 / Transport Strategy

Proposed changes to the A3 and the Clandon slip roads (document 003a, sections 11.14 to 11.34) will help to feed traffic more quickly into the local road system - what then? Jams will feed back onto the major roads and cause massive problems for both local and longer-distance motorists. Remember my remarks in the beginning of the letter, yes, it was me standing in traffic trying to get on time to RSH for work.

GBC's assessment of possible solutions to this is extremely superficial - it's easy to write a few sentences promising infrastructure will follow but this is a real problem to which there won't be an acceptable solution: a proper amount of infrastructure to cope with this amount of development will devastate the green belt and destroy the character of the area. Will make the life of existing and new residents miserable, extend commute time and pollute the air.

Your current document suggests (Appendix 11.4 of GBC Responses to Matters, Issues and Questions reference 003b) that the increase in morning traffic on the A247 Send Road will be just 3% - after adding nearly 40% to the housing stock of the village. The estimate is out by an order of ten and as far as I am concerned is just plain falsification.

Attached documents:

Comment: MM41 - LPMM18/6098  Respondent: Alena Thomas 8805633  Agent:

3. The Plan covers housing, industrial sites and other construction of buildings in some detail, but gives very little attention to the issue of infrastructure to support this development. Schools and medical facilities will need to follow and more thought should be given to how these can cope with demand. Where will the children go to school? Where the education providers been consulted on the influx of children? Let me guess…no. How the medical centre will cope? Nothing of it is explained in the plan, no opinion of the relevant specialist is provided. NONE.

*Roads* on the other hand are something it's very difficult to imagine coping with the suggested levels of new build, however you choose to plan them.

It is ludicrous that your “research” suggests the increase of 3% of traffic will follow. Maybe at 11 o’clock in the morning when granny drives to the shop, but not when 1500 additional cars join the local roads to get to work, children to school and so on.

Roads are already clogged: Send residents in the last few weeks have had roadworks with temporary traffic lights in two adjacent spots on the Portsmouth Road between Ripley and the A247 roundabout, and one on Send Road, plus the closure of Tannery Lane - these are all within half a mile of each other and have made it almost impossible to get anywhere, but they are just a tiny very local and current example of how the existing roads creak under the burden of existing traffic. The road into Guildford (crucial for all those new commuters you'll be creating) are far worse. Your proposals will add around 770 new houses to an area with about 2,000 in it at present and which already experiences these difficulties - do you honestly think sufficient roads can be built to carry the extra traffic without completely tearing up the local countryside?

MM27 MM41 MM42 and MM48 / Transport Strategy

Proposed changes to the A3 and the Clandon slip roads (document 003a, sections 11.14 to 11.34) will help to feed traffic more quickly into the local road system - what then? Jams will feed back onto the major roads and cause massive problems for both local and longer-distance motorists. Remember my remarks in the beginning of the letter, yes, it was me standing in traffic trying to get on time to RSH for work.
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Attached documents:

**Comment:** MM41 - LPMM18/6099  **Respondent:** Alena Thomas 8805633  **Agent:**

Specifically, I object to the current proposals on the following grounds:

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

The Garlick's Arch proposals (document 003a sections 11.36 to 11.37) will bring Send, Ripley and surrounding areas to a standstill, *even if* new roads are built cutting through more of the green belt - and these plans have been considerably enlarged since that time (550 houses instead of 400). The area also contains ancient woodland and is unsuitable for other reasons including frequent flooding.

Attached documents:

**Comment:** MM42 - LPMM18/6100  **Respondent:** Alena Thomas 8805633  **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The latest proposals have more than doubled the size of this already drastic development of industrial and storage space, and there is nothing like it proposed in any other village in Guildford Borough. Why is everything dumped on Send? Brownfield sites are available for this building, and the Slyfield estate could more easily bear much of the burden - *though less profitably for developers if that is your only consideration. The proposal therefore contradicts MM9 green belt provision.*

Send Business Centre provides places for work and is also growing at present - that's fine although Tannery Lane is narrow and already busy, but surely this means Send has already taken a share of the proposed industrial development, the need for which has not by the way been proven any more than has the demand for residential building.

**MM27 MM41 MM42 and MM48 / Transport Strategy**

Proposed changes to the A3 and the Clandon slip roads (document 003a, sections 11.14 to 11.34) will help to feed traffic more quickly into the local road system - what then? Jams will feed back onto the major roads and cause massive problems for both local and longer-distance motorists. Remember my remarks in the beginning of the letter, yes, it was me standing in traffic trying to get on time to RSH for work.

GBC's assessment of possible solutions to this is extremely superficial - it's easy to write a few sentences promising infrastructure will follow but this is a real problem to which there won't be an acceptable solution: a proper amount of infrastructure to cope with this amount of development will devastate the green belt and destroy the character of the area. Will make the life of existing and new residents miserable, extend commute time and pollute the air.
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Attached documents:

Comment: MM44 - LPMM18/6101  Respondent: Alena Thomas 8805633  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

This has been reinserted into plans at the last minute. The land is green belt, and the traffic will put pressure on already struggling infrastructure.

Attached documents:

Comment: MM48 - LPMM18/6104  Respondent: Alena Thomas 8805633  Agent:

MM27 MM41 MM42 and MM48 / Transport Strategy

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It would be great to think that as a result of the time and thought residents put into these discussions, Guildford BC would make a genuine attempt to create a workable plan, I submit the above in the hope that the strength of feeling of Send residents will eventually make some impression on you and lead to a more moderate and sensible set of proposals.

Attached documents:

Comment: MM2 - LPMM18/4901  Respondent: Alison White 8810017  Agent:

Reference MM2 - current housing figures in the plan are too high and need revising.I can see no reason why Woking's unmet housing needs are to be forced on to Guildford. If Woking has a genuine housing need, it should be met by Woking.
**Comment: MM9 - LPMM18/4902  Respondent: Alison White  8810017  Agent:**

MM9 - it is unacceptable to lose any more Green Belt while there are Brown field sites available.

**Comment: Other comments - LPMM18/6268  Respondent: Alison White  8810017  Agent:**

site A22 land north of Keens Lane is Green Belt land with ancient hedgerows and is a an important wildlife corridor. The local lanes, mostly little more than single track cannot support the level of traffic that a development of this size will create, nor can the infrastructure (A roads,schools, doctor & sewers) cope. Greenbelt land, as per Government guidelines should remain Greenbelt unless there are exceptional circumstances. There are NO special circumstances, just greedy developers.

**Comment: MM45 - LPMM18/960  Respondent: Claire Waters-Duke  8810145  Agent:**

I am a resident in Glaziers Lane, Normandy, Guildford, Surrey and I’m very concerned about the recently suggested field in my road which now comes under the new Local Plan, site A64, to follow are my thoughts:

- I gather you would like to see an additional 105 houses built on this highly sensitive green belt land, to the north of the railway line at Wanborough Station, on the east side of Glaziers Lane, this represents a 7% increase in the number of houses in Normandy and Flexford.
- I gather one of the reasons why this site was mentioned because there was a short fall in the number of houses in the Woking area. Our area I believe tends to be a lot more Greenbelt land than Woking, so I’m not sure why we are potentially having to build on our Greenbelt land.
- This land and this proposal has not yet been out for public consultation, so it seems unfair to include it at the last minute.
- We in Normandy are wondering what the exceptional circumstances are that you feel that our Normandy Greenbelt boundary needs to be removed? Have you really considered the actual need for all these houses and will people want to move to a quiet village, with no facilities? Surely we need to be looking around for a lot more Brownfield sites.
- Most importantly previous applications on this site have been refused by yourselves and have stressed on the extreme sensitivity and the damage that would be done to the openness of the Greenbelt should a development be permitted. A64 would be the thin end of a long wedge by starting to close the gap between the distinct settlements of Normandy and Flexford, it would eventually potentially lead to the urbanisation of Normandy.
- The sustainability assessment for this site says it is the smallest and most rural of all the sites included. It states that there are no existing facilities in Flexford....
• I gather no accompanying infrastructure improvements have been included, with the road and sewage systems in Normandy and Flexford already overloaded and 7% more houses being proposed will make the situation even worse.
• The proposed development would also have an adverse effect on the Surrey Hills Area of Outstanding Natural Beauty (AONB) in order to deliver the number of houses required the site would probably need to be 3 or even 4 storeys high. This would be completely out of keeping with the rest of the area and would have an adverse impact on the vista from the Hog’s Back in the AONB.

To conclude the site considered in Glaziers Lane would put long term strain on the community without conferring any countervailing benefit…

Other infrastructure issues:
• Roads – already congested, traffic often going too fast (we have had 2 cats killed on this road already) extra pollution
• A small railway bridge at a difficult angle close to the site – probably wouldn’t be able to cope with the additional load
• Doctors - already oversubscribed, likewise the local Primary School as well
• The wildlife and flora and fauna – we have lots of this in Normandy and some quite rare, their homes and habitats would be destroyed. We have a number of bats as well which I believe are a protected species, these might all die due to this development.
• We moved to Normandy for its rural area, to bring our children up to walk and enjoy the local countryside and to learn about the wildlife, this would be destroyed.

These are my concerns about the proposed development and I would very much like you to consider these when thinking about this site.

Attached documents:

**Comment:** MM2 - LPMM18/4808  **Respondent:** Gaenor Richards 8813601  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.
2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
3. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited 2. There is too much reliance on A3 improvements and these are beyond the council’s control 3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit 4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.
4. I would like the Inspector to RE-EXAMINE the Local Plan because:
5. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt 2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share The A247 I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the
previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years' time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4 ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
2. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh. The development of 1800 houses at Gosden Hill 5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247. The conversion of the Burnt Common roundabout to an all-ways junction with the A3 7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing route. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for redistribution of traffic - presumably as part of the policy of directing traffic around Guildford.

2. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247. The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are
underway)

2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway.

The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.

4. The sight lines for the exit of the Onslow Arms car park 5. The narrowness of the road near Summers 6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement 7. The sharp bend near Clandon Regis 8. The narrowness of the road at the Bull’s Head 9. The Clandon Junior School and the, in places, narrow footpath for children walking to school 10. The sharp bend with poor sight lines in either direction at the church 11. No continuous footpath through the length of the village 12. The speed of traffic 13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
Comment: MM23 -  LPMM18/4812  Respondent: Gaenor Richards 8813601  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 -  LPMM18/4819  Respondent: Gaenor Richards 8813601  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 -  LPMM18/4809  Respondent: Gaenor Richards 8813601  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

**Comment:** MM31 - LPMM18/4813  **Respondent:** Gaenor Richards 8813601  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

**Attached documents:**

**Comment:** MM32 - LPMM18/4814  **Respondent:** Gaenor Richards 8813601  **Agent:**

MM32 A height limit for White Lion Walk is required.

**Attached documents:**

**Comment:** MM33 - LPMM18/4815  **Respondent:** Gaenor Richards 8813601  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

**Comment:** MM35 - LPMM18/4816  **Respondent:** Gaenor Richards 8813601  **Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/4817  Respondent: Gaenor Richards 8813601  Agent:  

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/4818  Respondent: Gaenor Richards 8813601  Agent:  

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/4810  Respondent: Gaenor Richards 8813601  Agent:  

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM27 - LPMM18/5211  Respondent: Celia Howard 8817121  Agent:  

MM41 policyA43/
MM42 policy A58
MM44policy A63
MM9 Green belt policy
MM27/MM41/MM42/MM48
I write to object to the local plan for Send
I feel for all the sites in this area no consideration appears to have been given to the congestion on local roads, school places, parking and the medical centre where it's difficult to get an appointment and this is now (looking further afield the parking and appointments at the Royal Surrey are also hard to come by).

I think the council should think carefully before wiping out the green belt and turning another Surrey village into suburbia, a corridor from Guildford to Woking.

We need to keep the small pockets of countryside for the wildlife and our health benefits instead of increasing the pollution in the village.

Attached documents:

**Comment:** MM41 - LPMM18/5207  **Respondent:** Celia Howard 8817121  **Agent:**

MM41 policy A43/
MM42 policy A58
MM44 policy A63
MM9 Green belt policy
MM27/MM41/MM42/MM48

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Attached documents:

**Comment:** MM42 - LPMM18/5208  **Respondent:** Celia Howard 8817121  **Agent:**

MM41 policy A43/
MM42 policy A58
MM44 policy A63
MM9 Green belt policy
MM27/MM41/MM42/MM48
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Attached documents:

**Comment:** MM44 - LPMM18/5209  **Respondent:** Celia Howard 8817121  **Agent:**

MM41 policy A43/
MM42 policy A58
MM44 policy A63
MM9 Green belt policy
MM27/MM41/MM42/MM48

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Attached documents:

**Comment:** MM48 - LPMM18/5212  **Respondent:** Celia Howard 8817121  **Agent:**

MM41 policy A43/
MM42 policy A58
MM44 policy A63
MM9 Green belt policy
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I feel for all the sites in this area no consideration appears to have been given to the congestion on local roads, school places, parking and the medical centre where it's difficult to get an appointment and this is now (looking further afield the parking and appointments at the Royal Surrey are also hard to come by)

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Attached documents:

Comment: MM9 - LPMM18/5210  Respondent: Celia Howard 8817121  Agent:

MM41 policy A43/
MM42 policy A58
MM44 policy A63
MM9 Green belt policy
MM27 /MM41/MM42/MM48

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Attached documents:

Comment: MM41 - LPMM18/755  Respondent: Irene Cope 8817185  Agent:

I am once again writing to object to plans for the local area around Send and Ripley. The suggestions for the local area are madness which would destroy the environment around both Send and Ripley.

My first objection is the planning of Garlicks Arch [Reference no. MM41] the ancient woodland here will be destroyed and the extra volume of traffic this would produce is ridiculous. Even with the expected expansion of the M25/A3
junction and the developments around the local area the roads would be unable to cope with the extra traffic. Local people’s opinions are very important and it is disappointing that thousands of objections have been ignored by Guildford Borough Council.

Attached documents:

**Comment:** MM42 - LPMM18/756  **Respondent:** Irene Cope 8817185  **Agent:**

I also object to the Burnt Common development of land [Reference MM42] Public opinion is well documented yet the council has the audacity to think it has the right to increase the industrial storage space to around 14,800 sq mtrs. Building here makes no sense as Slyfield has capacity and space for extra storage units and two major roads linking the network to Woking and the A3

Attached documents:

**Comment:** MM44 - LPMM18/757  **Respondent:** Irene Cope 8817185  **Agent:**

The Alderton Farm plans [reference MM44] affects me personally 120 homes is madness. I live down Polsden Land for which I am very lucky it is a lovely place to live. However it appears Guildford think they have the right to destroy this Green Belt land. Green Belt land is something the GBC have no authority to build on and is against national legislation. This contradicts MM9. Living where I do I know better than most the demands on the roads the traffic congestion will be abhorrent and there will be a sharp rise in pollution.

GBC seem intent on building on every plot of land around Send and Ripley but what are the suggestions on local transport NONE this is complete farce and lack of thought the National transport networks are extremely strained it is laughable how anybody can think that the roads around Send and Ripley can cope with any increase of traffic. Finally how are the Villages Medical Practice and Send Schools expected to cope. Has the GBC thought about all of this seriously if they do they will realise what a shambles these local plans are

I look forward to hearing from you

Attached documents:

**Comment:** MM27 - LPMM18/2120  **Respondent:** Mrs. (Mrs. Kim Meredith) 8817537  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

Implications to traffic increasing to thousands more cars using our local roads and causing complete chaos, gridlock and air pollution have not been addressed. I therefore object and wish for more effort to be used to sort this major problem out.

Attached documents:
MM41 Land at Garlicks Arch, Send Marsh, Policy A43

I object to the increase in housing from 400 to 550.

This land is Green Belt, ancient woodland and should not be built on.

The development of this land will join up Send and Ripley causing loss of identity.

The village schools and the medical centre will not be able to cope with the huge increase in population. They are already full to capacity

The local highway infrastructure is not able to cope with the traffic we have at the moment, never mind an increase in traffic by over 800 cars from just this one site, let alone all the other sites proposed for Send and surrounding areas. This would cause traffic gridlock and total misery to anyone trying to use the roads.

The increase of between 1600-1700 extra people will completely overwhelm all the local amenities and facilities including sewage and water.

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM42 - LPMM18/2116  Respondent: Mrs. (Mrs. Kim Meredith) 8817537  Agent:

MM42 Land at Burntcommon, London Road, Send, Policy A58

I object to the increase in the minimum floor space at Burntcommon Warehouse. Slyfield industrial site, which is nearby, has unused capacity which should be utilised first before even considering using Burntcommon

The need for more industrial sites in the Green Belt is unjustified and with an additional increase at Send Business Centre this will mean Send has more Industrial space than any other village.

Send is in danger of being overdeveloped and will lose its Village identity. The main road to Woking through Send is already congested and I am concerned about the level of commercial traffic that will be moving to and from this proposed site.

Toxic levels of nitrogen dioxide are already dangerous in our area without the addition of all the extra vehicle congestion that will occur from this site. It is not acceptable to allow this proposed site when there is no proven demand for this sort of development

MM27 MM41 MM42 and MM48 Transport Strategy

Implications to traffic increasing to thousands more cars using our local roads and causing complete chaos, gridlock and air pollution have not been addressed. I therefore object and wish for more effort to be used to sort this major problem out.

Attached documents:
MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

I object to this addition of 120 houses to the plan.

The site is Green Belt with no special circumstances.

The increase in traffic will create gridlock our roads.

The levels of dangerous toxic air will increase.

Existing local services such as the schools and medical centre will not be able to cope with the additional people. They are already full to capacity.

If this went ahead, the amount of new homes being built with rise to 770, adding to the current 1700 resulting in an increase of 45% - this is far too much for our current infrastructure to cope with.

The consultancy firm Barton Willmore, have said that the correct figure for Guildford’s housing need should be 431 per year and the September data from the Office of National Statistics suggests that appropriate growth in Guildford Borough may be achieved with 460 houses a year. Why is it therefore felt that figure 789 per year figure should be used by the Inspector at the Public Examination? This is hugely over the top. Why is Send being proposed to be the main site to put all these extra, un-needed homes? We are a small Village and want to stay that way.

I agree there should be some development and understand the need for more housing, but I believe that this should be done throughout the borough using smaller developments and not concentrated in Send.

The current proposals for Send Marsh and Send are very inappropriate and will be highly damaging for the community and the area, let alone be an unnecessary erosion of the Green Belt.

These proposals have not given any solutions to the amount of traffic chaos, pollution, collapse of the local infrastructure and destruction of the green spaces in and around Send.

Attached documents:

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM2 - LPMM18/5135  Respondent: Julian Masters 8818433  Agent:
Ref: Guildford Borough Council’s Modified Local Plan consultation
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2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

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1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
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D. The Clandon Society Objections and Concerns Which I Share
The A247
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The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

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I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

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3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for redistribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working south on the A247 the issues are:
1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30 mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt
The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share
MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes...
table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/5139  Respondent: Julian Masters 8818433  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be incompatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/5146  Respondent: Julian Masters 8818433  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:
Comment: MM3 - LPMM18/5136  
Respondent: Julian Masters 8818433  
Agent: 

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

F. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5140  
Respondent: Julian Masters 8818433  
Agent: 

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5141  
Respondent: Julian Masters 8818433  
Agent: 

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5142  
Respondent: Julian Masters 8818433  
Agent: 

Attached documents:
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/5143  Respondent: Julian Masters 8818433  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/5144  Respondent: Julian Masters 8818433  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/5145  Respondent: Julian Masters 8818433  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/5138  Respondent: Julian Masters 8818433  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Comment: MM13 - LPMM18/2706  Respondent: Alan Robertson 8819265  Agent:

- MM13 There is too much allocation for retail in the town centre; recent new commercial properties are standing empty whilst the Council is foolishly allowing the building of unneeded offices on a site adjacent to the River Wey. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

Comment: MM2 - LPMM18/2704  Respondent: Alan Robertson 8819265  Agent:

- MM2 The housing target is wrong, the hearing should be reopened so that the latest ONS figures and household projections can be taken into account
- MM2 There should be NO requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
- The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/2708  Respondent: Alan Robertson 8819265  Agent:

- MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes)
- Strategic sites are to be exempt from design constraints allowing free reign to unscrupulous tax avoiding developers.
- There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/2709  Respondent: Alan Robertson 8819265  Agent:

- S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/2710  Respondent: Alan Robertson 8819265  Agent:

--A35 – Three Farms Meadows
<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/2707</th>
<th>Respondent: Alan Robertson 8819265</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR</td>
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<tr>
<td>• Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB</td>
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<td>Attached documents:</td>
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<td><strong>Comment: MM41</strong> – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43 – Garlicks Arch; MM44 – Aldertons Farm].</td>
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<td>• There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.</td>
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<td>Attached documents:</td>
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<tr>
<td><strong>Comment: MM50</strong> - LPMM18/1686</td>
<td>Respondent: Alan Robertson 8819265</td>
<td>Agent:</td>
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<td>• MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.</td>
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<td>• The biodiversity of the SNCI will be destroyed by the proposed development.</td>
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<td>• An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law</td>
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<tr>
<td>Our Local Plan is there for the benefit of Local Residents, not for the profit of off shore tax avoiding property developers. Those in Authority appear to have lost sight of this fact thereby making their tenure of office precarious.</td>
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<td>Attached documents:</td>
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<tr>
<td><strong>Comment: MM9</strong> - LPMM18/2705</td>
<td>Respondent: Alan Robertson 8819265</td>
<td>Agent:</td>
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<td>• MM9 – infilling in and around villages will result in the weakening of protection of the countryside (an obligation which the Council must respect)</td>
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<td>Attached documents:</td>
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<td><strong>Comment: MM45</strong> - LPMM18/2221</td>
<td>Respondent: Mr Chris Kelland 8819425</td>
<td>Agent:</td>
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</table>
I wish to respond to a part of the revised Local Plan as follows.

With reference to **Main Modification 45 (MM45)** dealing with **Policy A64** I would comment as follows.

The plan to build 105 houses over 3 years on this area of Green Belt Land is unacceptable for the following reasons:

1) This is valuable Green Belt Land which should be retained as such for the sake of current and future generations of villagers. Normandy is essentially a rural area and should remain as such.

2) This proposal would necessitate the altering of the settlement boundary. There are no exceptional circumstances to justify any development here.

3) Such development on this land would increase the population of the village by some 7% without there being any improvement to infrastructure. Normandy already suffers from flooding, bad surface water and foul water systems and inadequate roads. Any development would exacerbate this already intolerable situation.

4) I understand that the pressure on GBC to build more houses is partly due to a shortfall in the Woking Local Plan. Why should Guildford have to make up for the shortfall of another Council?

5) This proposal has not been in previous versions of the GBC Local Plan and so there has been no public consultation in this regard.

6) A development in this area will cause an unacceptable strain on Glazier's Lane in terms of volume of traffic. A minor road such as this will not be able to cope with such an increase in traffic.

7) The lack of facilities in Flexford and Normandy generally are such that any development here could never secure the long term future of the village.

For these reasons, I trust you will reconsider the inclusion of this Policy and omit it from the final version of the GBC Local Plan.

**Attached documents:**

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**Comment: MM12 - LPMM18/414  Respondent: Mr Howard Turner 8819457  Agent:**

I object to the change in wording in policy para's 1, 2(c), 3(d), and 4. The wording 'The measures must be agreed with Natural England' should be retained. 4.3.60 should retain the wording 'must be agreed with Natural England'. Reasoning - to protect the erosion of the Green Belt

**Attached documents:**

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**Comment: MM2 - LPMM18/410  Respondent: Mr Howard Turner 8819457  Agent:**

The proposed increase in the required number of dwellings is excessive and is not adequately substantiated. The methodology used to calculate the requirement for housing in the area fails to take account of the Borough's need to preserve its high proportion of designated Green Belt land and historic woodland, to enhance the air quality for London and its surrounding area.

**Attached documents:**
The proposed housing increase has a disproportionate impact on the villages of Send and Send Marsh/Burnt Common in particular.

Attached documents:

**Comment:** MM22 - LPMM18/415  **Respondent:** Mr Howard Turner 8819457  **Agent:**

Having already lodged objections to the proposals for Gosden Hill and Wisley airfield I object to their classification as new local centres.

Attached documents:

**Comment:** MM23 - LPMM18/416  **Respondent:** Mr Howard Turner 8819457  **Agent:**

Policy D4 1(b), 1(m) and 2(a) and (b) should be retained in order to ensure that development respects existing open space vistas and takes due account of factors such as air pollution and increased noise when considering planning proposals.

Attached documents:

**Comment:** MM25 - LPMM18/417  **Respondent:** Mr Howard Turner 8819457  **Agent:**

The Green Belt should be regarded as an irreplaceable heritage asset. I therefore object to the proposed revision of wording to ensure that the absolute protection of this asset is retained.

Attached documents:

**Comment:** MM27 - LPMM18/419  **Respondent:** Mr Howard Turner 8819457  **Agent:**

There has been inadequate assessment of the increased traffic implications of the huge development proposals concentrated on the northern boundaries of the borough.

Policy MM27 needs to provide a proper assessment of the transport implications on the A3, M25 and A247 Clandon Road of the proposed increases in both housing and industrial areas at Wisley, Gosden Hill and Send Marsh/Burnt Common and for this assessment to dictate the extent to which these development areas are feasible.

Attached documents:
I object to the increase in the number of proposed dwellings on an already inappropriate Green Belt site.

The proposed development is on land designated as important grade 2 agricultural land and ancient woodland, forming part of the Green Belt. The development would be completely isolated from the village community and bounded on all sides by busy highways which would ensure that the residents of such a development would have no contact with the adjoining village of Send Marsh/Burnt Common.

Send Marsh/Burnt Common has no infrastructure (doctors, schools, shops or road capacity) to support the proposed increase in population.

The character of the villages of Send, Send Marsh/Burnt Common, Clandon and Ripley would all be adversely affected by the proposal. Air and noise pollution are already unacceptable and this would be detrimentally and proportionately increased with an increase in the number of dwellings proposed. The currently open vista from the A3 would be adversely affected and not alleviated by the proposed screening of trees due to its sloping land profile.

Attached documents:

Comment: MM42 - LPMM18/421  Respondent: Mr Howard Turner 8819457  Agent:

I object to the huge increase in industrial/light industrial/storage and distribution floorspace, on the grounds of inappropriate impact on the already over-stretched transport network. The A3 and associated highways just cannot cope with the increased volume of traffic that this Syfield type development would impose.

Attached documents:

Comment: MM44 - LPMM18/422  Respondent: Mr Howard Turner 8819457  Agent:

I object to this new proposal for the additional traffic it would create and its consequential detrimental impact on the villages of Send, Send/Marsh Burnt Common and Ripley, where residents' access to roads is already very difficult.

Attached documents:

Comment: MM5 - LPMM18/411  Respondent: Mr Howard Turner 8819457  Agent:

The increased number of proposed traveller sites and the inequality of their distribution in the borough will cause disruption to sensitive local communities. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] If the sites are situated where planned then it will lead to a disruption of the general housing provision.

The distribution allocates a disproportionate number of traveller/show-people sites in the villages of Send Marsh/Burnt Common and Send and understates the large base area requirement and the roadway access that show-people require.
The need for a higher proportion of affordable homes in the borough is supported.

All housing and commercial development proposals within the designed Green Belt should not, as a matter of policy, be approved.

Housing numbers.

The evidence base underpinning the modified GUILDFORD PLAN is out of date and fundamentally flawed. The NPPF requires Guildford to base its development plan policies on up-to-date and relevant evidence. The number of households assumed for the plan period is is an over estimate. It is still based on out dated projections and ignores government targets and policies on reducing immigration and changes to the the number of new households arising from student net migration.

The current version of the Plan has increased the number of houses from 12,426 (in the previous version) to 12,600 (1.4% increase).

- On 20th September the Office of National Statistics (ONS) released new household growth projections for Guildford for the Plan period. The new figures reduced the projected growth in households from 11,142 (that applied to the previous version of the Plan) to 6,635; a reduction of 4,507 households (40.5% reduction).
- A reduction of 4,507 dwellings equates to well over two “strategic sites” (ie. the largest sites). The currently planned capacities of the following three sites would not be required to meet the target : - Wisley airfield (Site A35, MM40) 2,000 - Gosden Hill Farm (Site A25, MM35) 1,800 - Send Marsh (Site A43, MM41) 550
- In my view the reduced new housing target as above would help alleviate the pressure on the Green Belt and therefore development at Wisley should be shelved.

The evidence base has now introduced a flawed economic factor to support the projected growth in the number of households. The economic growth will be substantially less over the planning period than assumed due to the BREXIT changes and the likely shift of a substantial number of jobs away from the City of London to Europe. The knock on effect to Guildford will be less spending power locally. The move to on line shopping will further reduce the requirement for local town centre shops and jobs and growth in household numbers. This is unfortunate but inevitable.
New Government Statistical Data data on household numbers has been published in September 2018. This should be used. On this basis the growth in household numbers will be 40% less than assumed.

It is also vital the council now carefully reconsiders the demographic make up of the household numbers. It is quite possible that much of the growth is due to an ageing population in which case an increase in the number of care homes for the elderly might well address some of the need.

Attached documents:

Comment: MM9 - LPMM18/1899  Respondent: Mr Stephen Stuart-Matthews 8824833  Agent:
MM9

Limited infilling clause 3a). I object to this change of wording as it will gradually remove protection against limited infilling in the green belt outside the settlement areas. The phrase "should be considered to be within the village" instead of "is as a matter of fact within the village" will lead to gradual growth of the village at the boundaries to the settlement area. As the housing density near the settlement area boundary gradually increases the relationship of infill developments just outside the settlement area with the village will grow ever stronger. The new wording under 4.3.25 will allow and even encourage infill developments to occur near to settlement areas as they "should be considered" to be within the village, when previously they were not "as a matter of fact".

For example the southern end of Chalk Lane or Green Dene are attractive wooded areas in the Green Belt bordering on the Surrey Hills. These areas are just outside the settlement area for East Horsley. Under the new proposals such areas would become vulnerable to infilling as the density along these roads gradually increased with infill. This would negate the Green Belt protection currently preserving these wooded areas and the overall effect would over time be to the detriment of the Green Belt and indeed to the Surrey Hills. This change undermines the purpose of the Green Belt legislation and will cause harm to the Green Belt and will lead to increased housing density right up to the borders of the Surrey Hills, an area of outstanding natural beauty.

Attached documents:

Comment: MM2 - LPMM18/4333  Respondent: Merrow Residents' Association (Keith Meldrum) 8825057  Agent:
MM2- I consider that the housing number of 672 is too high and should be lowered to take into account the new data from the ONS and to remove the figure of 42 new households per year to meet Woking’s unmet need now that the housing need in Woking has been re-evaluated.

Attached documents:

Response of the Merrow Residents’ Association to the Main Modifications to the Submission Local Plan (2017) Guildford Local Plan: Examination in Public (EIP)

This statement should be read in conjunction with our earlier submissions on the Local Plan.
We have commented and raised concerns about the OAN in our submissions on the earlier draft versions of the Local Plan. In doing so we were relying on the expert advice from Neil MacDonald from NMSS who has been contracted by the Guildford Residents’ Association to give advice on the ONS data. The MRA has access to and is entitled to make use of that advice as a contributing member of the GRA.

Mr MacDonald suggests there were large differences between GL Hearn and NMSS about how the number of extra homes needed to support job growth should be estimated: GL Hearn calculated this at 606 homes a year 2015-34 and NMSS at 460 homes a year. The differences are largely concerned with the assumptions made about the proportion of the population that will be in work or seeking work i.e. economic activity rates.

GL Hearn and NMSS also differ on whether the above figures will provide adequate accommodation for the expected increase in the number of students living in rented accommodation in Guildford. NMSS believe that it will; GL Hearn believe that an extra 23 homes a year are needed for students.

Adjusting the homes for jobs led figures accordingly, the GL Hearn estimate of the number of homes needed each year (the OAN) is 629 (i.e. 606 + 23) whereas the NMSS figure is 460 (i.e. 460 + 0). It is the view of Mr MacDonald that when the key figures are updated to reflect the 2016-based household formation rate projections:

• the number of homes implied by the unadjusted 2016-based household projections is 325 homes a year (2015-34) – compared with 420 homes a year based on using the 2016 SNPP to update the 2014-based projections. This is a reduction of 23%.

• the NMSS calculation of the number of homes needed to support the Inspector’s view of the rate of jobs growth is 361 homes a year – compared with 460 homes a year previously estimated. This is a reduction of 22%.

There will be similar reductions in the GL Hearn figures, suggesting a revised estimate in the range 480-490 homes a year 2015-34, although the exact number cannot be calculated without the detailed population age profiles for the GL Hearn projections.

Based on the new information from ONS and NMSS, and the material reductions in housing need that these point to, we take the view that it is essential that the Examination of the Local Plan is re-opened by the Inspector to allow the latest ONS and NMSS data to be examined and discussed.

There is no need to repeat concerns that have been raised about the proposal to increase our housing requirement by 42 households per year to meet Woking’s unmet needs as they have even been expressed by members of the Guildford Borough Council Executive Committee at their meeting on the 4th September. National policy requires that the unmet need from neighbouring authorities could be met where it is practical to do so. We would argue that it is not practical to do so where this will require additional erosion of Guildford’s Green Belt. Guildford has exactly the same Green Belt constraints as Woking and it could just as easily be argued that Woking should be required to accept some of Guildford’s need. We also highlight that based on the recent ONS figures the Woking unmet need is now itself overstated and this is a further argument for Guildford to avoid further Green Belt erosion.

We urge the Inspector to review this element of the Local Plan and eliminate the unmet need figure of 42 new households per year completely.

Attached documents:

Comment: MM2 - LPMM18/5754  Respondent: Merrow Residents' Association (Keith Meldrum) 8825057   Agent: Response of the Merrow Residents’ Association to the Main Modifications to the Submission Local Plan (2017) Guildford Local Plan: Examination in Public (EIP)
This statement should be read in conjunction with our earlier submissions on the Local Plan.

MM2- We have commented and raised concerns about the OAN in our submissions on the earlier draft versions of the Local Plan. In doing so we were relying on the expert advice from Neil MacDonald from NMSS who has been contracted by the Guildford Residents’ Association to give advice on the ONS data. The MRA has access to and is entitled to make use of that advice as a contributing member of the GRA.

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Adjusting the homes for jobs led figures accordingly, the GL Hearn estimate of the number of homes needed each year (the OAN) is 629 (i.e. 606 + 23) whereas the NMSS figure is 460 (i.e. 460 + 0). It is the view of Mr MacDonald that when the key figures are updated to reflect the 2016-based household formation rate projections:

- the number of homes implied by the unadjusted 2016-based household projections is 325 homes a year (2015-34) – compared with 420 homes a year based on using the 2016 SNPP to update the 2014-based projections. This is a reduction of 23%.
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There will be similar reductions in the GL Hearn figures, suggesting a revised estimate in the range 480-490 homes a year 2015-34, although the exact number cannot be calculated without the detailed population age profiles for the GL Hearn projections.

Based on the new information from ONS and NMSS, and the material reductions in housing need that these point to, we take the view that it is essential that the Examination of the Local Plan is re-opened by the Inspector to allow the latest ONS and NMSS data to be examined and discussed.

There is no need to repeat concerns that have been raised about the proposal to increase our housing requirement by 42 households per year to meet Woking’s unmet needs as they have even been expressed by members of the Guildford Borough Council Executive Committee at their meeting on the 4th September. National policy requires that the unmet need from neighbouring authorities could be met where it is practical to do so. We would argue that it is not practical to do so where this will require additional erosion of Guildford’s Green Belt. Guildford has exactly the same Green Belt constraints as Woking and it could just as easily be argued that Woking should be required to accept some of Guildford’s need. We also highlight that based on the recent ONS figures the Woking unmet need is now itself overstated and this is a further argument for Guildford to avoid further Green Belt erosion.

We urge the Inspector to review this element of the Local Plan and eliminate the unmet need figure of 42 new households per year completely.

Attached documents:
MM23 - We support and appreciate the importance of Master Planning. This is especially important for Gosden Hill Farm (Policy A25) to ensure that no development takes place until agreement is reached between the developer and GBC on the key infrastructure requirements for the whole site covering the road network, accessibility, transport, and provision of both water and sewage. We are very concerned that with this site there is a suggestion that some development might take place before any infrastructure improvements have been made. This would be unacceptable.

However, this policy makes no specific reference to infrastructure nor to the means by which the Master Plan will be approved. The position of the Master Plan in the planning process is left vague. This deficiency should be rectified and the Local Plan should require that a Master Plan for Gosden Hill Farm be approved before any development takes place.

Attached documents:

Comment: MM23 - LPMM18/5757  Respondent: Merrow Residents' Association (Keith Meldrum) 8825057
Agent:

MM23- We support and appreciate the importance of Master Planning. This is especially important for Gosden Hill Farm (Policy A25) to ensure that no development takes place until agreement is reached between the developer and GBC on the key infrastructure requirements for the whole site covering the road network, accessibility, transport, and provision of both water and sewage. We are very concerned that with this site there is a suggestion that some development might take place before any infrastructure improvements have been made. This would be unacceptable.

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Attached documents:

Comment: MM26 - LPMM18/5164  Respondent: Merrow Residents' Association (Keith Meldrum) 8825057
Agent:

MM26- We consider the wording in para 4 is too vague and to avoid uncertainty should read-

The imposition of Grampian conditions shall be considered as a means to secure the provision of infrastructure when it is needed.

Attached documents:

Comment: MM26 - LPMM18/5758  Respondent: Merrow Residents' Association (Keith Meldrum) 8825057
Agent:

MM26- We consider the wording in para 4 is too vague and to avoid uncertainty should read-
The imposition of Grampian conditions shall be considered as a means to secure the provision of infrastructure when it is needed.

Attached documents:

**Comment:** MM27 - LPMM18/5165  **Respondent:** Merrow Residents' Association (Keith Meldrum) 8825057

**Agent:**

MM27 – 4.6.18a which follows the discussion in the Examination of the Local Plan gives us real concerns. We contend that the proposed two-way junction with the A3 in Policy A25 should be a 4 way junction. We refute the suggestion that if the A3 Improvement Schemes do not take place, the traffic problems can be mitigated by other measures. GBC suggested at the Examination in Public that these could include the Sustainable Movement Corridor and the new railway station in Merrow. We do not accept that these mitigating measures - even if they are implemented - are likely to deliver the level of necessary mitigation to address the potential serious traffic problems in the area which underlines the critical importance of a 4 way junction with the A3 on the Gosden Hill Farm site.

In addition we contend that the Sustainable Movement Corridor is not sustainable or viable at all in view of the restricted nature of the roads between Burpham and the Town Centre along the A3100.

More comment on this can be found at MM35.

Attached documents:

**Comment:** MM27 - LPMM18/5759  **Respondent:** Merrow Residents' Association (Keith Meldrum) 8825057

**Agent:**

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In addition we contend that the Sustainable Movement Corridor is not sustainable or viable at all in view of the restricted nature of the roads between Burpham and the Town Centre along the A3100.

More comment on this can be found at MM35.

Attached documents:

**Comment:** MM28 - LPMM18/5166  **Respondent:** Merrow Residents' Association (Keith Meldrum) 8825057

**Agent:**

MM27 – 4.6.18a which follows the discussion in the Examination of the Local Plan gives us real concerns. We contend that the proposed two-way junction with the A3 in Policy A25 should be a 4 way junction. We refute the suggestion that if the A3 Improvement Schemes do not take place, the traffic problems can be mitigated by other measures. GBC suggested at the Examination in Public that these could include the Sustainable Movement Corridor and the new railway station in Merrow. We do not accept that these mitigating measures - even if they are implemented - are likely to deliver the level of necessary mitigation to address the potential serious traffic problems in the area which underlines the critical importance of a 4 way junction with the A3 on the Gosden Hill Farm site.

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<tr>
<th>Comment: MM28 - LPMM18/5760</th>
<th>Respondent: Merrow Residents' Association (Keith Meldrum) 8825057</th>
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<tbody>
<tr>
<td>MM28 – We suggest that consideration should not only be given to setting maximum parking standards but also minimum standards.</td>
<td>Attached documents:</td>
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<tr>
<th>Comment: MM3 - LPMM18/5161</th>
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| MM3 – We appreciate that Policy S3 has been introduced at a late stage but it is neither a plan nor a strategy. We take the view that Policy S3 should be converted into a Master Plan to be incorporated into the Local Plan and that in addition it should include an element of housing development.  
4.1.19 - We note that there is no reference to the importance of buses nor bus connections in the reasoned justification in 4.1.19. It is our view that there should be.  
4.1.21 - We suggest that emphasis should be put on the possibility of underground car parking.  
4.1.25 - More should be said about the shopping experience and that since retail sales are diminishing this should be taken in consideration at the development stage of the Master Plan. | Attached documents: | |

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<th>Comment: MM3 - LPMM18/5755</th>
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4.1.25 - More should be said about the shopping experience and that since retail sales are diminishing this should be taken in consideration at the development stage of the Master Plan. | Attached documents: | |
MM2 - I consider that the housing number of 672 is too high and should be lowered to take into account the new data from the ONS and to remove the figure of 42 new households per year to meet Woking’s unmet need now that the housing need in Woking has been re-evaluated.

Comment:

Respondent: Merrow Residents' Association (Keith Meldrum) 8825057

Agent:

MM35 – We appreciate the drafting behind these modifications but the detail is less than clear.

Transport Strategy (1) is clear but Transport Strategy (2) is less so and the paragraph suggests that there could be an all movements junction of the A3 with roads north of the A3, west of the site and also to the east of the site. The wording of this condition should be amended to be absolutely clear as to what is being proposed to avoid confusion and debate at the planning application stage.

We say this because advice had been sought from GBC Officers prior to the Examination of the Local Plan and they raised the possibility of the connecting road running north east of the site but south of the A3 until it reached approximately Ewbank offices (on the north side) where a new road and bridge could cross the A3 and link up with the existing B2215 thence on to the A247.

We continue to take the view that there should be a 4 way junction with the A3 at Gosden Hill Farm. The 3 way junction at Garlick’s Arch together with the two-way junction at Gosden Hill Farm does provide a spread-eagled 4 way junction but does not avoid the reality that traffic for London from the site would have to go through Burpham or Merrow to get onto the A3. In order to prevent additional traffic congestion and snarl ups in Burpham we continue to believe that there should be a 4 way junction on the Gosden Hill Farm site. We suggest that Transport Strategy (2) should be amended to provide for the option of either such a 4 way junction or the suggestion from Officers mentioned in the preceding paragraph to be finally determined at the Master Planning stage.

We suggest that the last sentence of Transport Strategy (2) should be a separate condition as a link road to the A247 is a separate issue to a possible all movements junction on the A3.

Comment:

Attached documents:

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Attached documents:

Comment: MM41 - LPMM18/5168  Respondent: Merrow Residents’ Association (Keith Meldrum) 8825057
Agent: MM41 – We support the provision at (0b) and a through vehicular link between the B2215 and the A247 that relieves pressure on the Send Marsh roundabout. We have already commented under MM23 on the importance of an infrastructure strategy for Gosden Hill Farm and we suggest that the infrastructure strategy for Gosden Hill Farm should also include these elements taken from MM41.

Attached documents:

Comment: MM41 - LPMM18/5762  Respondent: Merrow Residents’ Association (Keith Meldrum) 8825057
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 Attached documents:

Comment: MM5 - LPMM18/5162  Respondent: Merrow Residents’ Association (Keith Meldrum) 8825057  Agent: MM5 – We note that at 4.2.23 it is stated there is no evidence for a need for a (travellers) transit site within our borough. This is at total variance with the advice published by Commissioner David Munro on the 19th June 2018 where he stated that the use of Transit Sites had been useful in other areas but there are none in Surrey. He states that they should be introduced following a number of recent unauthorised encampments. A number of these have been in Guildford.
Since travellers from time to time make a nuisance of themselves in Merrow by occupying our Park and Ride facility causing significant inconvenience to our residents, we take the view that there is a need for a transit site in or near to our borough to avoid travellers parking illegally.

**Attached documents:**

**Comment:** MM5 - LPMM18/5756  **Respondent:** Merrow Residents’ Association (Keith Meldrum) 8825057  **Agent:**

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Since travellers from time to time make a nuisance of themselves in Merrow by occupying our Park and Ride facility causing significant inconvenience to our residents, we take the view that there is a need for a transit site in or near to our borough to avoid travellers parking illegally.

**Attached documents:**

**Comment:** MM2 - LPMM18/3682  **Respondent:** Rebecca Young 8825825  **Agent:**

**Lack of Credibility for GBC’s Proposed Housing Numbers.**

The latest government formula for predicting housing need and the recent Office For National Statistics figures for Guildford Borough’s requirements both produce much lower numbers than the approximately 630 homes per year in GBC’s draft Local Plan.

I object to the principle that GBC should increase it’s already over inflated housing targets by accepting some of Woking’s “housing need”.

The housing need in the draft Local Plan is significantly overestimated and should be reviewed with full transparency. The GBC Local Plan cannot proceed with credibility until this has been done.

To summarise, I appreciate the need to build more homes, but in order to gain support I believe GBC has to achieve the following:

1) credible numbers for housing need

2) the ability for local residents and parish councils to have influence in deciding where they should be built within a community, with an emphasis on brown field sites.

I hope that my views will be taken into account as part of the public consultation process.

**Attached documents:**
Main Modification 45 (MM45), Policy A64 Land East of Glaziers Lane, Flexford

I object to the proposed Policy A64.

No exceptional circumstances have been demonstrated

Under the National Planning Policy Framework “Exceptional Circumstances ” are required to take land out of the Green Belt to allow development. These haven’t been demonstrated by Guildford Borough Council (GBC) in the selection of a site that has recently been confirmed as “red sensitivity” Green Belt. This site has been the subject of several planning applications for smaller numbers of houses, these have all been rejected due to the value of this piece of the Green Belt.

It is difficult to imagine what the exceptional circumstances would be, given that it appears from the SA Report Addendum September 2018, page 22 note to Table 5.1 in reference to the Total Additional Homes (yrs 1 to 5):

“* There is a need to reiterate two points. Firstly, these homes would be in addition to the land supply supported by the submission plan.”

This tells us that proposed Policy A64 would remove land from the Green Belt to deliver homes that are in addition to those already included in the local plan, therefore these are homes in addition to those required to meet GBC’s stated anticipated housing need.

How can removing land from the Green Belt to provide houses to exceed the estimated need be consistent with “exceptional circumstance”? GBC should exert pressure on developers for early delivery on sections of the sites already identified in the Local Plan, rather than consuming unnecessary Green Belt.

Sustainability

Of the numerous sustainability factors to be considered, only one appears to be met by Policy A64 i.e. proximity to a train station.

No evidence has been provided to justify such strong preference based on a survey of the travel habits of the existing Flexford population.

Sustainability must surely be considered in conjunction with accessibility. There is no access to the East bound platform of Wanborough station for people with reduced mobility.

As the SA Report Addendum reiterates, there are no other facilities in Flexford. The nearest shop is Pinewood Stores, Ash approximately 2.5 miles away. The nearest primary school (Wyke) is 1.5 miles, which most people would consider too far to walk with young children. These distances to amenities is inconsistent with “sustainable development”.

Flooding Considerations

Approximately a quarter of the proposed site is a lake. The water table on the rest of the site is frequently high, demonstrated by visible surface water during the winter months. I consider the SA Report Addendum statement (page 63) to be optimistic:

“ Glaziers Lane at Flexford is associated with a degree of surface water flood risk at its eastern extent. “

Lack of Local Consultation

Both Glaziers Lane and Westwood Lane have seen development of “brown field sites” in recent years. Examples include: Milton Close, Manor Farm Close, Station Approach.
There may be more brownfield sites in the area that could be brought forward for sensitive re-development, but local residents and the Parish Council have not been given opportunity to pursue these as an alternative to Green Belt site Policy A64.

Attached documents:

**Comment:** MM2 - LPMM18/4073  **Respondent:** Tim Madge 8826369  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.
I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/4076  **Respondent:** Tim Madge 8826369  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.
MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4083  Respondent: Tim Madge 8826369  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/4074  Respondent: Tim Madge 8826369  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:
Comment: MM31 - LPMM18/4077  Respondent: Tim Madge 8826369  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4078  Respondent: Tim Madge 8826369  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4079  Respondent: Tim Madge 8826369  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/4080  Respondent: Tim Madge 8826369  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/4081  Respondent: Tim Madge 8826369  Agent:
MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

**Comment: MM44 - LPMM18/4082  Respondent: Tim Madge 8826369  Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

**Comment: MM9 - LPMM18/4075  Respondent: Tim Madge 8826369  Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

**Comment: MM2 - LPMM18/3842  Respondent: Martin Barker 8826529  Agent:**

I believe the Examination of the Local Plan should be reopened in the light of the September 2018 report from the Office of National Statistics. The report indicates that there has been a gross overestimate of the housing requirement for Guildford.

- The housing number of 672 extra houses a year upon which the Local Plan has been based is hugely inflated. The figure should be reduced by about half and certainly to no more than about 360 houses per year.
- In view of this new evidence there is no longer any justification for any Green Belt development
- With the continued trend by the public to shop online, the town centre development should contain much less space retail stores and instead be used for more housing in the form of flats and attractive riverside development.

Attached documents:

**Comment: MM43 - LPMM18/5832  Respondent: Wonersh Parish Council (Kevin Garvey) 8826977  Agent:**

**GUILDFORD BOROUGH LOCAL PLAN: PUBLIC CONSULTATION**

This Council is grateful for the opportunity to submit the following observations and concerns about the proposed allocation of land at Hornhatch Farm for housing development (approximately 80 homes), as set out in Main Modification 43, Policy A62. The Council also wishes to place on record its support for the observations and concerns expressed by Shalford Parish Council and St Martha Parish Council in the latters’ submissions to you about the MM43.
While supporting the need to increase housing provision across Surrey it is imperative that this is done in a way that is sympathetic to the environment and ensures the supporting infrastructure (such as transport links, schools and health services) can cope with the additional demand. The Council considers that such development at the northern boundary of this parish will have considerable negative impact unless mitigating conditions can be agreed and implemented. The increase in traffic on congested rural roads is a particular concern, especially in view of the likely Dunsfold development. Any significant development such as Hornhatch therefore needs to be considered strategically, taking into account other proposed developments within Waverley Borough as well as in Guildford Borough. Provision of a sustainable motor vehicle traffic plan must be a prerequisite. It follows that it would be unacceptable to consider the suitability of Hornhatch Farm land for housing development in isolation.

**Impact on views from AONB/AGLV**

The draft policy rightly requires “sensitive design, siting and form of development that has significant regard to its location on the edge of the village and views from the AONB/AGLV”. However, we are doubtful that any design can effectively mitigate the negative impact of a substantial number of houses which will close the current open views from the Downs Link footpath and bridleway and other footpaths and views from Wonersh Parish on its northern boundary.

**Loss of Greenbelt**

The loss of this green belt land will inevitably change the character of the area from Rice’s Corner to the edge of the current Chilworth settlement boundary. The effect will be to urbanise this area and significantly close the gap between the villages of Chilworth, Shalford and Wonersh.

**Access**

Although detailed plans have not yet been developed, access to the site is likely to be onto the A248 which will be both difficult and dangerous.

**Impact on traffic congestion**

The combined impact of ongoing housing developments at Cranleigh and Horsham as well as potentially at Dunsfold within Waverley Borough are already having an adverse impact on traffic congestion within Wonersh Parish as more drivers use the B2128 to avoid stretches of the A281 between Cranleigh, Bramley and Shalford. In particular, which is relevant to MM43, Rices corner at the A248 junction already experiences severe congestion at peak periods. This adds to congestion on minor roads such as Blackheath Lane, Sampleoak Lane as drivers seek rat runs to avoid this junction. This has a particularly serious negative impact on the settlement of Blackheath. In addition drivers heading to Guildford use The Street Wonersh and Chinthurst Lane as a route to avoid Rices Corner.

We also note that the current railway transport infrastructure is inadequate to relieve traffic to any appreciable extent. Two railway stations are something over a kilometer away from the Hornhatch Farm site and the service on the railway line between Guildford and Gatwick is limited.

**Pressure on local services**

We are concerned that the local services including schools and medical surgeries will not be adequate to support the additional residents of Chilworth. This will lead to more pressure on services in our parish and beyond, adding further to the traffic congestion.

**Attached documents:**

**Comment:** MM2 - LPMM18/2725  **Respondent:** Mark Blowers 8827169  **Agent:**
The following are my comments to the modifications to the Local Plan after the Planning Inspector’s Public Examination of the Plan in June/July 2018:

MM2 NUMBER OF HOUSES

The modifications to the Local Plan has increased the number of houses from the previous version of the plan. The number of houses had increased from 12,426 to 12,600 a 1.4% increase.

The Office of National Statistics (ONS) has (on 20th September) released new household growth projections for the Plan period of 2015 to 2014. These projections have reduced the growth in households from 11,142 in the previous plan, to 6,635.

The modifications to the Local Plan do not take into consideration this significant reduction in number of houses required. The number of houses required is at the core of the Local Plan and impacts requirements on affordable housing, size and number of proposed sites, impact on infrastructure and the use of Green Belt land. Therefore the public examination of the Planning Inspector must be re-opened.

Attached documents:

Comment: MM2 - LPMM18/3230  Respondent: Robert Wood 8827809  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole; I believe it to be fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited; the unsightly mess around the bus station area is surely in dire need of improvement
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

    The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not, and cannot, have the capacity to deal with the increase in traffic. Also it is not clear to me how that seemingly random figure was arrived at.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

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**Problems with the West Clandon section of the A247**
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   MM2 Although extra sites are required because some might not come to fruition, the *housing supply* figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.
Comment: MM23 - LPMM18/3233  Respondent: Robert Wood 8827809  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Comment: MM23 - LPMM18/3240  Respondent: Robert Wood 8827809  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation. The infrastructure consequences of the Plan have received scant attention.

The Plan is unsound and should be re-examined.

Comment: MM3 - LPMM18/3231  Respondent: Robert Wood 8827809  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share
MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

**Attached documents:**

**Comment:** MM31 - LPMM18/3234 **Respondent:** Robert Wood 8827809  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

**Attached documents:**

**Comment:** MM32 - LPMM18/3235 **Respondent:** Robert Wood 8827809  **Agent:**

MM32 A height limit for White Lion Walk is required.

**Attached documents:**

**Comment:** MM33 - LPMM18/3236 **Respondent:** Robert Wood 8827809  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

**Comment:** MM35 - LPMM18/3237 **Respondent:** Robert Wood 8827809  **Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.
MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment: MM41 - LPMM18/3238  Respondent: Robert Wood 8827809  Agent:**

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment: MM44 - LPMM18/3239  Respondent: Robert Wood 8827809  Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment: MM9 - LPMM18/3232  Respondent: Robert Wood 8827809  Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment: MM45 - LPMM18/2955  Respondent: Diana Marchant 8828641  Agent:**

Regarding MM45 Policy A64.

As a long time Resident of Normandy I do not agree with the proposed new housing development, which in my view seems to threaten the rural character of Normandy.

My main reasons are lack of local amenities - no shops or pubs, serious overcrowding on surrounding rural roads, lack of any plan of new local infer structure & general full capacity of our School & Medical Centre.

It seems that this is a completely new site & did not feature in previous versions of the local plan & 105 houses in our village would considerably alter the character of this Green Belt area.
I would very much like the Inspector to re-open the examination & amend the Local Plan.

Attached documents:

**Comment: MM51 - LPMM18/2126  ** **Respondent: Fernanda Mayne 8830177  ** **Agent:**

**Ref: Guildford Local Plan: Strategy & Sites - main modifications 2018**

**Amendment 1: Horsley - West Horsley (South) (MM51)**

I would like to express my strong approval of the above modification of Guildford Council's Local Plan protecting the unspoilt greenbelt and rural character of the village of West Horsley.

The previous proposed boundary was clearly indefensible and should never have been considered as acceptable for development.

In addition, the village infrastructure will simply not allow for development of this kind.

Thank you for taking the sensible decision to protect the greenbelt in this way.

Attached documents:

**Comment: MM2 - LPMM18/1377  ** **Respondent: Mr John Dumbleton 8831393  ** **Agent:**

I am aware of the differences between GL Hearn and Neil MacDonald of NMSS, the consultant engaged by Guildford Residents Association to analyse the housing figures. It is quite clear that the figures should be re-examined in light of the latest ONS forecasts for Guildford's population and household growth. To retain the current housing requirement in the Plan without re-opening the Examination to consider and debate the ONS forecasts will make the Plan unsound.

Whilst a high housing figure should theoretically result in more infrastructure, that is no reason to provide for more houses in the Local Plan than the real need justifies. In any event, new developments will only provide infrastructure to deal with existing problems insofar as they will have been made worse and will not provide a solution to address the backlog inherent in Guildford's historical shortfall.

Whilst it is national policy that the unmet housing need from neighbouring authorities should be met where it is practical to do so, it cannot be practical or logical that Guildford should have to surrender part of its own Green Belt to meet part of Woking's unmet need to avoid encroachment on its own Green Belt. Guildford has the same Green Belt constraints as Woking. Furthermore, the latest ONS figures for Woking support the proposition that its unmet need is overstated. This element of the Local Plan also needs to be re-examined so that Woking's unmet need figure can be deleted from Guildford's housing requirement.

Attached documents:

**Comment: MM23 - LPMM18/1392  ** **Respondent: Mr John Dumbleton 8831393  ** **Agent:**
As a resident of Merrow I consider a Master Plan is essential for Gosden Hill Farm (A25) and should be approved before any development takes place. In particular, no development should take place until the key infrastructure elements required for the whole site including roads, water and sewage have been have been agreed by GBC with the developer as part of the Master Plan. This is particularly important since houses are to be built on part of the site in the 1st 5 years of the Plan and they should not be allowed to be built before a Master Plan for the whole site has been approved.

Attached documents:

Comment: MM27 - LPMM18/1397  
Respondent: Mr John Dumbleton 8831393  
Agent:

Practical experience of current traffic problems around Guildford would contradict the assertion that if the A3 Guildford Improvement scheme is delayed or cancelled alternative measures may mitigate the impact of development traffic. For example, the impact on the local road network in Burpham and Merrow of regular problems on the A3 in recent times indicates that without the scheme new development traffic will create insoluble challenges which a Sustainable Movement Corridor and/or new railway station in Merrow cannot hope to solve. Common sense would indicate a Sustainable Movement Corridor in the area is not viable in view of the restricted width roads between Burpham/Merrow and the Town Centre.

Attached documents:

Comment: MM3 - LPMM18/1390  
Respondent: Mr John Dumbleton 8831393  
Agent:

Para 4.1.19 of the Reasoned Justifications should include some mention of a new bus station or bus interchange to provide a better link to the rail station.

Attached documents:

Comment: MM35 - LPMM18/1398  
Respondent: Mr John Dumbleton 8831393  
Agent:

Para (2) of the Transport Strategy is meaningless. Whilst it is only suggesting the possibility of an all movements junction for the A3 without any obligation to provide it, it is actually in danger of creating traffic chaos for Burpham as traffic bound for London would have to go through Burpham or Merrow to access the A3. There should be an express commitment to provide a dedicated 4 way junction on the A3.

Attached documents:

Comment: MM2 - LPMM18/1902  
Respondent: Jan Chapman 8832257  
Agent:

Figures published by the Office of National Statistics in September 2018 predict considerable reductions in future population growth. These reductions should be taken into account in current review of the Local Plan.
The Council has previously opposed proposals for 30 homes on this site. There is no indication in the present review of what has changed sufficient that 80 homes are now acceptable at this same location.

The site is in the Green Belt and very close to the Surrey Hills AONB. Its development would adversely affect the views of the surrounding countryside from within the AONB. Green belt sites such as this are precious and should not be released for development at an early stage of the Development Plan period when brown-field sites are available.

The Sustainability Appraisal Report Addendum states that this site 'performs well relative to other village Green Belt sites under consideration.' This relative position does not imply that the site is in any way sustainable and, in fact, there are many reasons why it is not.

For example:

1) there is limited public transport so future occupiers would be dependent on cars, thus increasing pressure on the already overloaded roads between Chilworth and Guildford. This in turn would further increase the risks to pedestrians and cyclists using these routes.

2) The only nearby GP practice is in Wonersh, not accessible by public transport. The practice appears to be under considerable pressure - it seems unlikely that the residents of 80 new properties could be accepted onto it’s list at all and certainly not without adverse affects on the service to all patients.

Objection to the addition of site A64 (Flexford) in MM45

We are of the strong opinion that site A64 in MM45 should be removed from the local plan for the following reasons:

1. Neil MacDonald has demonstrated that building 360 homes per year would adequately support the very ambitious growth rate for Guildford proposed by the Planning Inspector. The figure of 630 new homes per year on which the local plan is based is massively out of step with the new Office of National Statistics figures.

2. We firmly believe 360 homes per year could be accommodated in Guildford town centre (as requested by the Planning Inspector) or on brown-field sites, thereby protecting our beautiful green, open spaces for future generations.

3. Site A64 is located within the Green Belt and no exceptional circumstances to remove its Green Belt designation have been provided.

4. The addition of site A64 is simply a knee-jerk reaction to the Planning Inspector’s request to build more houses earlier in the planning period. Over the years that the Local Plan has been under consultation, this site has never even been considered, let alone proposed. Further, all previous planning applications for this site (nothing to do with the Local Plan) have been refused, underlining the sensitivity of the site and the damage that would be inflicted on the Green Belt.
5. Building 104 new homes on such a small site will not be in keeping with the rest of the village, almost all of the houses along Glaziers Lane are family homes with extensive gardens. To achieve 104 homes on the proposed site would require very dense housing and involve multistorey flats, realistically this site could not accommodate more than 20 new homes if it is to remain in keeping with the rest of the village.

6. The villages of Flexford and Normandy lie in a shallow basin that is very prone to flooding, site A64 is currently a field that acts as drainage during periods of heavy rain, how do you propose to accommodate the water run-off once the field has been concreted over?

7. This site is close to Surrey Hills AONB, as such, building on this land will have a detrimental impact on local wildlife.

8. Site A64 is located on Glaziers Lane, a small D road, not really suited to cope with an additional 400+ car journeys per day.

9. The entrance to the site will be just north of the bridge over the railway line, with a notoriously blind summit that silly idiots speed over, having an additional 400+ cars exiting and entering the proposed site each day will inevitably lead to collisions. In addition, the railway bridge is currently in need of major repair work.

10. The sustainability assessment indicates site A64 is a very poor choice: Flexford currently has no facilities other than the train station, and the facilities of nearby Normandy village (GP surgery and primary school) are already over-subscribed. No improvements to the local infrastructure have been included in the plan to accommodate the proposed 2-400 new residents.

Attached documents:

**Comment: MM2 - LPMM18/2964  Respondent: Trevor Brook 8834561  Agent:**

I believe the present proposals are fundamentally flawed and need revising in at least the following ways:

- to properly use brownfield sites for housing rather than expanding retail and sacrificing green belt.

Attached documents:

**Comment: MM3 - LPMM18/2965  Respondent: Trevor Brook 8834561  Agent:**

- to pedestrianise the entire station, town and bus station areas, probably by creating new crossings.

Attached documents:

**Comment: MM12 - LPMM18/10  Respondent: Martin O'Hara 8835425  Agent:**

2. Policy 5: Thames Basin Special Protection Area – MM12 I write to **OBJECT** to the proposed modification to this policy.
I believe that this amendment only requires consultation with Natural England rather than their agreement as previously drafted. This, in my opinion, puts too much control in the hands of Guildford Borough Council over this matter of National and Regional importance. I believe that the ultimate judgement on the impacts or benefits to the Thames Basin SPA should rest with the appropriate national body, in this case Natural England.

Attached documents:

Comment: MM51 - LPMM18/11  Respondent: Martin O'Hara 8835425  Agent:

3. Appendix H: Maps – **MM51**  I write to **OBJECT** to the proposed modification to this policy.

I believe that to seek to vary the extent of a long disputed inset village settlement boundary at this late stage is unacceptable. Many of the local population have responded on numerous occasions objecting to the extent of the land around West Horsley that is to be removed from Green Belt protection. I believe that, inevitably, there will be a degree of consultation fatigue amongst some who have previously responded, particularly given that this modification document is extensive and not the easiest read for a lay person.

Attached documents:

Comment: MM9 - LPMM18/9  Respondent: Martin O'Hara 8835425  Agent:

1. Policy P2: Green Belt – **MM9**  I write to **OBJECT** to the proposed modification to this policy.

I believe that the proposed modification would allow development outside of the long discussed, and objected to, proposed inset settlement boundaries “where it can be demonstrated that the site should be considered to be within the village”. I would have thought after all the years of consultation etc that the inset village settlements were now fully ‘considered’ and that any further subsequent encroachment into the Green Belt by expanding the proposed inset village settlements would, and should, be resisted completely.

Attached documents:

Comment: MM45 - LPMM18/616  Respondent: Roger Shapley 8836129  Agent:

I wish to object to your MM45 re policy A64 on the grounds that it will have an adverse effect on Surrey Hills AONB.

Attached documents:

Comment: MM45 - LPMM18/752  Respondent: Marian Sage 8836545  Agent:

I strongly object to this proposal.
This land is classified as red-rated Green Belt.

The proposed development would have an adverse effect on the Surrey Hills Area of Outstanding Natural Beauty (AONB) and would have an adverse effect on the views from the Hog’s Back (AONB).

Guildford Borough Council has not given any circumstance that would be needed to redraw the Green Belt boundary. What “exceptional circumstances” can justify taking this land out of red rated Green Belt. Again, why consider extending the Flexford settlement north of the railway line onto a red rated “Green Belt” site.

This site has already had two building applications refused. The reasons for their refusal have not changed in any sense and stress its extreme sensitivity and the damage that would be done to the openness of the Green Belt should development be permitted on it.

The description of this land Policy A64: as Land between Glaziers Lane and Strawberry Farm, Flexford is misleading. The land is in Normandy. Flexford is wholly on the southern side of the railway line.

No proposals have been made by GBC to improve the infrastructure. With road and sewerage systems already overloaded, 7% more houses would create an intolerable burden.

The site is next to Strawberry Farm waste management site. Possible environmental and other hazards have not been addressed.

The Planning Inspector at the Plan’s Examination in Public in June challenged GBC to build more houses earlier in the plan period suggesting more houses could be built in the town centre where there are plenty of Brownfield Sites waiting to be utilised. GBC has completely ignored this and unjustifiably plucked out five green belt sites.

Normandy residents have shown during previous responses to earlier versions of the Local Plan that we care passionately about preserving the rural nature of our community. I wonder now whether we’ve been listened to all.

Expert opinion indicates that the overall housing estimated in the Local Plan is greatly exaggerated, failing to take account of the latest housing projections from the Office of National Statistics.

As this site has not featured in the local plan up until now, why is it allowed to be inserted at such short notice with no previous public consultation.

The traffic increase would be considerable and dangerous at a joining point within yards of the narrow and blind railway bridge.

Attached documents:

Comment: MM13 - LPMM18/4576  Respondent: R Brind 8837281  Agent:

- MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

Comment: MM2 - LPMM18/4574  Respondent: R Brind 8837281  Agent:
GENERAL

• MM2 The housing target is wrong. The hearing needs to be reopened so that the latest ONS figures and household projections can be taken into account
• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road, Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/4578  Respondent: R Brind 8837281  Agent:

• MM23 (Policy D1) waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes)
• Strategic sites should NOT be exempt from design constraints.
• There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/4579  Respondent: R Brind 8837281  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/4580  Respondent: R Brind 8837281  Agent:

SITE SPECIFIC – A35 – Three Farms Meadows

• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR
• Land to the south abuts the Ockham Conservation area and another Grade II Listed Building (Bridge End House) and increases the visibility of the site to/from the Surrey Hill AONB

Attached documents:

Comment: MM41 - LPMM18/4577  Respondent: R Brind 8837281  Agent:
• MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].
• There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM50 - LPMM18/4581  Respondent: R Brind 8837281  Agent:

• MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
• The biodiversity of the SNCI will be destroyed by the proposed development.
• An Appropriate Assessment and a Habitats Regulation Assessment has not been completed – in breach of case law.

Attached documents:

Comment: MM9 - LPMM18/4575  Respondent: R Brind 8837281  Agent:

• MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM45 - LPMM18/1400  Respondent: Ms Ruth Archer 8839233  Agent:

I wish to object to this proposal to build 103 dwellings on this site. I'm not opposed to some AFFORDABLE housing development within the Normandy and Flexford area but this high density housing proposal threatens the area's rural character. This proposal appeared out of nowhere and does not seem to have been thought through.

• There are no community facilities in Flexford and the GP surgery in Normandy and the local infant school already struggle to cope with demand
• There is no access for the mobility impaired to the platform for the trains to Guildford.
• The site is next to the Strawberry Farm waste management site and there is no mention of assessing the possible environmental impact and potential hazards
• The sewerage system in the Flexford/Glaziers Lane area is already overloaded and results in flooding after heavy rain and there is nothing in the proposal to improve the sewage system
• Building 7% more houses without plans to improve the road infrastructure will cause traffic problems particularly as the railway bridge in Glaziers Lane is already showing signs of structural stress
• Previous planning applications for building on this site have been turned down due to the effect on the Green Belt and the Surrey Hills Area of Outstanding Natural Beauty
• There is no explanation of the required "exceptional circumstances" to explain why the Green Belt boundary in Normandy should be redrawn

Attached documents:
**Comment: MM45 - LPMM18/1716  Respondent:  Mrs Julia Hall 8839425  Agent:**

This is a very large development on green belt land with the only access being Glaziers Lane. Glaziers Lane is already a very busy through route for vehicles from Woking/Godalming/Farnham and for very large recycling vehicles for the increasingly numerous recycling facilities which have been allowed in this area. The bridge over the railway line is already (worryingly) developing a 'bump' which can be felt as you drive over it - more traffic would increase the problems with this. The size of the development would increase the traffic considerably and unacceptably both on Glaziers Lane and at the junction of the Glaziers Lane and Guildford Road which is already notoriously dangerous and would add to the traffic queuing every morning and evening trying to turn right or to cross into Hunts Hill Road. Hunts Hill Road is a narrow winding road and this development would add to the traffic unacceptably on that road also. I think 105 houses is much too great a number for Normandy to shoulder when there are other more suitable sites available around Guildford.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/4968  Respondent:  Lynn Yeo 8839521  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dear Guildford Borough Council Planning Policy Team,</td>
</tr>
<tr>
<td>I am a resident of Send and am writing to object to the changes in the latest Local Plan. I have responded to all precious versions of the Local Plan and am extremely disappointed at the current version which adds insult to injury, by not only disregarding the thousands of responses regarding overdevelopment in Send, but actually significantly increasing the amount of development in Send. Not only have previous objections been ignored, but Guildford Borough Council appear to have decided that even more development would be the correct response to local objections</td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/4973  Respondent:  Lynn Yeo 8839521  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to MM41,MM42,MM44,MM9, MM27, POLICY S2.</td>
</tr>
<tr>
<td>At the public examination, the figure for Guildford Borough housing need used by the inspector was 789 per year. This figure was obtained by Guildford Borough Council (GBC) Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year. In addition, using data from the Office of National Statistics population forecasts, suggests that the appropriate growth in GBC can be achieved by 460 houses per year.</td>
</tr>
<tr>
<td>This latest data makes a mockery of GBC consultants figures which have always been very suspect. I believe the number of houses per year to be unreasonably high, and that the actual figure should be revised downwards for more responsible and reasonable levels of development.</td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

| Comment: MM27 - LPMM18/4974  Respondent:  Lynn Yeo 8839521  Agent: |
I object to MM27, MM41, MM42 and MM48 Transport Strategy.

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful way addressed by the Road changes of the A3 and Clandon Slip Roads. This massive increase in traffic heading to and from Woking along Send Barns Road and Send Road, which are single lane roads, will cause horrendous noise, air pollution delays and gridlock. I live just off Send Road on Wharf Lane and find the road is already congested during rush hours. Additional development to the scale described in the plan would undoubtedly result in significant increased congestion, air and noise pollution and very real decrease in quality of life for Send’s residents.

Attached documents:

Comment: MM41 - LPMM18/4969  Respondent: Lynn Yeo 8839521  Agent:

I object to MM41, MM42, MM44, MM9, MM27, POLICY S2.

At the public examination, the figure for Guildford Borough housing need used by the inspector was 789 per year. This figure was obtained by Guildford Borough Council (GBC) Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year. In addition, using data from the Office of National Statistics population forecasts, suggests that the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of GBC consultants figures which have always been very suspect. I believe the number of houses per year to be unreasonably high, and that the actual figure should be revised downwards for more responsible and reasonable levels of development.

Attached documents:

Comment: MM41 - LPMM18/4975  Respondent: Lynn Yeo 8839521  Agent:

I object to MM27, MM41, MM42 and MM48 Transport Strategy.

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful way addressed by the Road changes of the A3 and Clandon Slip Roads. This massive increase in traffic heading to and from Woking along Send Barns Road and Send Road, which are single lane roads, will cause horrendous noise, air pollution delays and gridlock. I live just off Send Road on Wharf Lane and find the road is already congested during rush hours. Additional development to the scale described in the plan would undoubtedly result in significant increased congestion, air and noise pollution and very real decrease in quality of life for Send’s residents.

Attached documents:

Comment: MM41 - LPMM18/4978  Respondent: Lynn Yeo 8839521  Agent:
I object to MM41 Land at Garlicks Arch, Send Marsh, Policy A43.

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years. This is an increase of 37% in the number of houses to be built which was already very high for this site, which shouldn’t have any such development on it to begin with. Despite the promises by developers and GBC, the ancient woodland on the site will be ruined. Ancient woodland has been around since at least the time of Henry VIII or even much older, and are the natural environment’s equivalent of a Grade I listed property. We wouldn’t tear down a Grade I listed building to build new homes, we should not destroy ancient woodlands to build new homes.

This over development will effectively join Ripley to Send and add to creeping sprawl by connecting the separate villages.

Parts of this site are prone to frequent flooding and should therefore not be used for housing or building development.

Up to a thousand cars and between 1,600 to 1,700 extra people will create huge amounts of congestion on surrounding roads and overwhelm the already full to capacity schools, health facilities and transport, sewage and water infrastructure. This development will add approximately 2,500 additional car journeys daily on local roads, a huge number for the currently already congested A247 and B2215.

Why have over 7,000 objections to the earlier plan been ignored and more houses and development added ? It makes a mockery of the consultation process.

As a parent of a child about to start school, I have visited several schools and know that local schools are already full or oversubscribed. Our medical facilities are already stretched and I do not believe that the thousands of new residents for this size of development can be accommodated without severe strain on local infrastructure. I have not seen any creditable plans to increase provision for local infrastructure, which makes all the proposed developments very unsustainable and irresponsible.

Attached documents:

Comment: MM42 - LPMM18/4970  Respondent: Lynn Yeo 8839521  Agent: 

I object to MM41,MM42,MM44,MM9, MM27, POLICY S2.

At the public examination, the figure for Guildford Borough housing need used by the inspector was 789 per year. This figure was obtained by Guildford Borough Council (GBC) Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year. In addition, using data from the Office of National Statistics population forecasts, suggests that the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of GBC consultants figures which have always been very suspect. I believe the number of houses per year to be unreasonably high, and that the actual figure should be revised downwards for more responsible and reasonable levels of development.

Attached documents:

Comment: MM42 - LPMM18/4976  Respondent: Lynn Yeo 8839521  Agent:
I object to MM27, MM41, MM42 and MM48 Transport Strategy.

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful way addressed by the Road changes of the A3 and Clandon Slip Roads. This massive increase in traffic heading to and from Woking along Send Barns Road and Send Road, which are single lane roads, will cause horrendous noise, air pollution delays and gridlock. I live just off Send Road on Wharf Lane and find the road is already congested during rush hours. Additional development to the scale described in the plan would undoubtedly result in significant increased congestion, air and noise pollution and very real decrease in quality of life for Send’s residents.

Attached documents:

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Comment: MM42 - LPMM18/4979  Respondent: Lynn Yeo 8839521  Agent:

I object to MM42 Land at Burnt Common, London Road, Send Policy A58.

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land, why has Send been picked on again to have the largest industrial allocation in any village in the Borough? This is a further increase of 25% making it a huge increase in Send, bigger than any other village. There is no need for new industrial sites when Slyfield is has unused capacity. There are no special circumstances so it contradicts MM9. There is no need to put Industrial premises on precious Green Belt. This site has, since being deleted from 2014 plans, been increased twice from 7,000 sqm, which was already too much to an even more absurd minimum of 14,800 sqm.

Narrow surrounding roads will be affected by heavy traffic for the site, increasing already dangerously high nitrogen dioxide levels.

Attached documents:

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Comment: MM44 - LPMM18/4971  Respondent: Lynn Yeo 8839521  Agent:

I object to MM41, MM42, MM44, MM9, MM27, POLICY S2.

At the public examination, the figure for Guildford Borough housing need used by the inspector was 789 per year. This figure was obtained by Guildford Borough Council (GBC) Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year. In addition, using data from the Office of National Statistics population forecasts, suggests that the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of GBC consultants figures which have always been very suspect. I believe the number of houses per year to be unreasonably high, and that the actual figure should be revised downwards for more responsible and reasonable levels of development.

Attached documents:

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Comment: MM44 - LPMM18/4980  Respondent: Lynn Yeo 8839521  Agent:
I object to MM44 Land at Aldertons Farm, Send Road, Policy A63.

This site for 120 homes was deleted because of objections and not reinserted until the public examination in July. I used to live on Aldertons Farm and can confirm that the surrounding fields were often flooded and waterlogged throughout the winter months.

This is a Green Belt site with no special circumstances so it contradicts policy MM9.

550 new homes at Garlicks Arch, 60 at Clockbarn, 40 at Winds Ridge, means an additional 770 houses are being added to the 1,700 currently in Send, an increase of 45%! The predictable outcome is that current and future residents will face excessive traffic, pollution and poor supporting infrastructure due to the ridiculous size of the proposed development. Again this is Green Belt and with no special circumstances, it contradicts policy MM9.

Attached documents:

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Comment: MM48 - LPMM18/4977  
Respondent: Lynn Yeo 8839521  
Agent:

I object to MM27, MM41, MM42 and MM48 Transport Strategy.

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful way addressed by the Road changes of the A3 and Clandon Slip Roads. This massive increase in traffic heading to and from Woking along Send Barns Road and Send Road, which are single lane roads, will cause horrendous noise, air pollution delays and gridlock. I live just off Send Road on Wharf Lane and find the road is already congested during rush hours. Additional development to the scale described in the plan would undoubtedly result in significant increased congestion, air and noise pollution and very real decrease in quality of life for Send’s residents.

Attached documents:

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Comment: MM9 - LPMM18/4972  
Respondent: Lynn Yeo 8839521  
Agent:

I object to MM41,MM42,MM44,MM9, MM27, POLICY S2.

At the public examination, the figure for Guildford Borough housing need used by the inspector was 789 per year. This figure was obtained by Guildford Borough Council (GBC) Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year. In addition, using data from the Office of National Statistics population forecasts, suggests that the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of GBC consultants figures which have always been very suspect. I believe the number of houses per year to be unreasonably high, and that the actual figure should be revised downwards for more responsible and reasonable levels of development.

Attached documents:
MM9 Green Belt Policy

I disagree with the claim that the modifications will protect our precious Green Belt except in very special circumstances. GBC make an exception for limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village. This is a catch all statement which is completely subjective causing complete uncertainty and completely negates Green belt protection. Virtually any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

In conclusion, I wish the above objections to be considered and this huge imposition of housing and commercial development on my beloved village of Send to be abandoned. The proposed developments are to the extreme detriment of existing and future residents, our local environment, and are very undemocratic and unfair. This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn Nursery on Tannery Lane and a 25% increase in size of the Send Business Centre despite its proximity to the Wey Conservation area. Added to all the other housing sites and industrial space being proposed for Send, it represents a very heavy concentration of development in one small village, which should be more evenly shared with the approximately 40 other villages in Guildford Borough.

Attached documents:

Re: MM41 – land at Garlicks’ Arch, Send March Policy A43

I OBJECT to the modifications to the local plan.

This site has increased from 400 to 550 homes, of which 450 are to be built in the first 5 years.

This increase of 37% in the number of homes is excessive. 7000 objections to the previous proposal have been ignored.

This is Green Belt and includes Ancient Woodland, which should have protected status under both the previous and current NPPFs. The inspector queried how residents would arrive to Guildford by public transport and I wonder the same - the road network will be too busy to reach central Guildford in a timely manner by bus and to reach Clandon station is too far to walk and there are no bicycle lanes.

This will join the communities of Send and Ripley, and thereby breach one of the key functions of Green Belt.

The site is not suitable for housing: it is subject to frequent flooding and is contaminated by former uses.

The burying of overhead electrical cables is costly.

The air pollution from the A3 which is adjacent will cause lung issues for residents.

At least 800 extra cars will block adjacent roads, and school and medical facilities will not cope.

Attached documents:
MM42 Land at Burnt Common

I object to the modifications. Now that the site has increased from 7000 to 14800 sq m of industrial and storage – this has been increased twice, having been previously deleted from the 2014 plan. It has now doubled the area. It is by far the largest new industrial allocation in any village. There is unused industrial capacity at Slyfield so there is no need to site development land in the Green Belt. The Employment Land Needs Assessment showed a reduction in demand for industrial land, and this allocation is on top of a 25% increase at Send Business Centre. When this is complete there would be a bigger concentration of industrial units in Send than in any other village. The narrow village roads will not cope and this will affect air quality adversely.

Attached documents:

Comment: MM44 - LPMM18/5173  Respondent: David Burnett 8839553  Agent:

I OBJECT to the modifications:

This new site for 120 homes was deleted from an earlier draft, so I don't know why it has been re-inserted? It is a Green Belt site and no exceptional circumstances have been demonstrated; It will increase traffic, detract from heritage buildings and adds still more homes to the already inflated additions for Send (an increase of 45% for the village as a whole). I also worry whether the nearby old English settlement with moat has been considered.

Attached documents:

Comment: MM9 - LPMM18/5172  Respondent: David Burnett 8839553  Agent:

I am writing to make comment on the latest round of the Draft Local Plan for Guildford Borough in particular MM9 Green Belt policy.

I OBJECT to the modification "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village."

This demonstration of whether a site is within a village or not is quite subjective - no criteria is being supplied.

Thank you for considering my point.

Attached documents:

Comment: MM2 - LPMM18/1419  Respondent: Richard Ayears 8840161  Agent:

I believe the Guildford Borough Council’s Local Plan is unsound because:

I. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
II. There is too much reliance on A3 improvements and they are beyond the council’s control

III. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

IV. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination. GBC does not have to commit to catering for Woking’s under provision.

V. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Attached documents:

**Comment: MM13 - LPMM18/1576**  **Respondent:** David K Reynolds 8840193  **Agent:**

MM13 As a result of the move to online shopping affecting all retailers, The allocation of retail space should be reduced and used for affordable housing.

Attached documents:

**Comment: MM2 - LPMM18/1575**  **Respondent:** David K Reynolds 8840193  **Agent:**

I ask for the public hearing to be reopened. I object to the following:

MM2. The latest ONS population statistics showing a 40% reduction in households must alter the housing target which makes the plan unsound and deletes Woking’s unmet need. It was fundamentally unfair for this to be foistered on to Guildford. The effect on Ripley High St and Portsmouth Rd of an additional 500 houses in Send has not been properly thought through. The spatial strategy requires town centre and urban brownfield development prior to green belt release. See MM13 below.

Attached documents:

**Comment: MM23 - LPMM18/1577**  **Respondent:** David K Reynolds 8840193  **Agent:**

MM23. Policy D1 reduces the requirement for the social dimension of sustainability which is unrealistic in this day and age. The proposal that strategic sites should be exempt from design constraint will allow developers to put up ghettos.

Attached documents:

**Comment: MM41 - LPMM18/1579**  **Respondent:** David K Reynolds 8840193  **Agent:**
MM41 The Transport strategy and inadequate modelling does not take into account Highways England 2 year delay to junction 10, this affects sites A35, A43 & A44.

Attached documents:

Comment: MM50 - LPMM18/1580  Respondent: David K Reynolds 8840193  Agent:

A35 Much of the new land to the south of the appeal site is unable to be used due to the VOR beacon and therefore does not make a significant reduction in the density problem. This land abuts the Ockham Conservation Area and the site visibility to and from the Surrey Hills AONB.

There are no justified grounds for reducing the size of the SNCI as the whole site qualifies on ecological grounds. The development will destroy the biodiversity of the SNCI.

Case law requires an Appropriate Assessment and a Habitats Regulation Assessment which have not been done.

I support the representation made by the Wisley Action Group which was written with advice from Richard Harwood QC.

In my view all the above make a very strong requirement for the public hearing to be reopened.

Attached documents:

Comment: MM2 - LPMM18/2003  Respondent: Brendan McWilliams 8840353  Agent:

1. The Guildford Residents' Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
Comment: MM23 - LPMM18/2006  
Respondent: Brendan McWilliams 8840353  
Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of “**green approaches**” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

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Comment: MM23 - LPMM18/2015  
Respondent: Brendan McWilliams 8840353  
Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

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Comment: MM3 - LPMM18/2004  
Respondent: Brendan McWilliams 8840353  
Agent:

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

---

Comment: MM3 - LPMM18/2013  
Respondent: Brendan McWilliams 8840353  
Agent:
1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/2007 Respondent: Brendan McWilliams 8840353 Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2008 Respondent: Brendan McWilliams 8840353 Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2009 Respondent: Brendan McWilliams 8840353 Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2010 Respondent: Brendan McWilliams 8840353 Agent:
MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2011  Respondent: Brendan McWilliams 8840353  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded

Attached documents:

Comment: MM44 - LPMM18/2012  Respondent: Brendan McWilliams 8840353  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM48 - LPMM18/2002  Respondent: Brendan McWilliams 8840353  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

**Attached documents:**
MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM2 - LPMM18/5860  **Respondent:** Catharine Dean 8843617  **Agent:**

**Guildford Borough Council’s Modified Local Plan consultation**

I feel the current plan does not reflect the vision for the town’s future shared by so many residents, and would lead to a degraded environment in and around our historic town.

I would like you to note the following comments in support of this belief:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole. I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control.
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit.
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There have been several major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the Office for National Statistics (ONS) which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns which I share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road for any increase in traffic. I live on the road and can see lorries mounting the pavement scores of times each day.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads and lanes (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.
I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents. I have photographs showing lorries mounting the pavement in close proximity to mothers with pushchairs heading for the primary school in West Clandon.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. There is already a proposal to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
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**Problems with the West Clandon section of the A247**

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2. The sharp blind bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is obscured by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that
Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site
behind the station.

4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers (and my property)
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without
mounting the pavement, a pavement used twice daily by children walking “sustainably” to the primary school,
and by crocodiles of the same schoolchildren walking to the recreation ground.
7. The sharp S-bend near Clandon Regis. Currently most of the warning pillars at the edge of the road have been
knocked over.
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow unprotected footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church. The church car park is on the opposite side
of the road and pedestrians cannot see oncoming traffic when they cross
11. No continuous footpath through the length of the village
12. The speed of traffic, frequently exceeding the speed limit with speeds in excess of 60mph in a 30mph area having
been recorded
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this
requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the
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more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the
town centre and reduced pressure on the Green Belt.

1. **Guildford Residents’ Association’s Objections and Concerns which I share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a
sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes
table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic
growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the
Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student
homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when land in
Guildford is more constrained, when Woking is proposing Green Belt development, and when Woking’s need figure has
also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table
(S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**
Comment: MM23 - LPMM18/5864  Respondent: Catharine Dean 8843617  Agent:

MM23  In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23  (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23  Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23  If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

1. The Guildford Vision Group’s Objections and Concerns which I share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/5862  Respondent: Catharine Dean 8843617  Agent:

MM3  In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3  There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:
Comment: MM31 - LPMM18/5869  Respondent: Catharine Dean 8843617  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31  A height limit for North Street is required.

MM31  There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5866  Respondent: Catharine Dean 8843617  Agent:

MM32  A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5873  Respondent: Catharine Dean 8843617  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/5877  Respondent: Catharine Dean 8843617  Agent:

MM35  Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35  Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35  If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/5879  Respondent: Catharine Dean 8843617  Agent:
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<td>MM2 I am writing to object to the adoption of the Main Modifications to the Local Plan and to call for the examination in public to be reopened. In particular, I object to MM 2. There is no justification to requiring Guildford to take Woking’s unmet need as this would require further encroachment on Greenbelt land. And the figures on which the housing requirement has been based are not the latest figures supplied by the Office of National Statistics.</td>
<td>Moira Tailby 8846177</td>
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<td>MM51 I am writing to register my firm approval of Amendment 1: Horsleys - West Horsley (South) (MM51) as there was no justification for encroaching on Greenbelt land.</td>
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Re: Inappropriate Development on site A64 Green Belt, Normandy

I would like to raise my objections regarding the development of 105 homes in our lovely rural village of Normandy. This will totally ruin the heart of our village and destroy our rural environment. As you are aware from past consultations the above site is not a welcome proposition, for a number of reasons.

• There is already a problem with the traffic; this can only get worse with all the extra housing, and the extra cars etc using the small D rural roads. In Westwood lane there is the extra problem of the railway bridge with one way traffic. It is utter chaos in the evening trying to get onto the Guildford/ Aldershot Road during the peak times. It can take as long as 40 minutes to drive a mile towards Ash. The primary school is going to cause more problems with children being dropped off and picked up for school, as well as the possibility of being overcrowded. The roads are so small and not wide enough for two cars to pass. One has only to come and see the state of the grass verges all around the area to establish vehicles have to mount the pavement to get past other vehicles, at the present times with the huge Lorries using our village as a short cut to the A31. The bridge in Glaziers Lane over the railway line adjacent to Wanborough station is currently showing signs of worse for wear due to the amount of traffic over the bridge. It is also extremely dangerous because the size of the lorries take more than one lane to drive over.

The local GP surgery cannot cope at the moment; I have to wait four weeks to see my doctor at the present time. There is no point saying get more doctors as there is already a shortage of doctors. The local services will not be able to cope either.

• We need to maintain our wildlife, we should be looking at ways of keeping the environment green and not being overloaded with property in areas of wild life. What would happen to the current lake on the site in question? This situation makes an even worse scenario for our drainage system, and could lead if more property is built, being all concrete, to the whole area being flooded. This is purely greed of squeezing people into confined spaces. Changing the fields into a concrete jungle is not a welcome sight. Why are you even considering building on green belt land? When there are numerous other sites to be considered for example brown field sites, your Councillor explained the reasons for not using them, the answer to that is take the matter to Parliament get the law changed. Or is this because GBC wants more money from Council Tax.

• I am very surprised with GBC allowing all the extensions on small two bedroom bungalows when there is a shortage of affordable housing, GBC allows small two bedroom bungalows to be made into 4/5 bedrooms. Is this again a money making facility for GBC.

• I would like you to consider the A64 site with the village of Normandy as a priority to maintaining a healthy environment to live in. I look forward to your comments.

Attached documents:

Comment: MM45 - LPMM18/4335  Respondent: Faye Medley 8846785  Agent:

Your Ref Main Modification 45/Policy A64

I am writing to reject the proposed housing development for the following reasons.

Green Belt: Need I say more.

105 Dwellings: To accommodate this amount of dwellings you must be proposing flats within this development. This is not in keeping with the current housing guidelines that we as residents have had to abide by for many home improvement application.
Flooding: When we have excessive rain fall the field becomes a major floodplain, it retains a large amount of rain fall over the year. The properties further down Glaziers Lane have been flooded on several occasions. This field is located at the top of a gradual hill in Glaziers Lane. I am lead to belief you are not intending on making any improvements to the drainage system that is in place. We are all well informed that flooding issues in the UK have increased due to many people converting gardens to hardstanding for parking/patios etc. Building on this field would cause increased flooding in many more homes along Glaziers Lane without a doubt.

Parking: With a possible increase of 105 cars, I cannot see how you expect that amount of vehicles to park in the proposed area without it off spilling on to Glaziers Lane 50 yards from Wanborough Station Bridge. Drivers do not stick to the 30mph speed limit. With cars parked so close to the bridge will cause a major highway hazard. You will notice that every home in Glaziers Lane has provisions for at least two cars per property, thus reducing parked cars along Glaziers Lane. It is not the widest of roads.

D road: Glaziers Lane is classified a D road. It is not capable in accommodating 105 extra vehicles every day.

Loss of habitat for the wildlife and flora: The pond located in the field is a hub for many of our local wild insects and mammals; we are blessed with the variety of birds and insects that pollenate our gardens. We have hedgehogs, foxes, deer, adders and many more that all use the pond. During the dryer months of the year the front of the field is home for our local traveling community to house their horses that are in foal. This plot of land is far more than just an empty field with a pond.

There are umpteen reasons why this development should not go ahead; I’ve just given you a couple.

Attached documents:

Comment: MM12 - LPMM18/1104  Respondent: Paul Gerrard 8848033  Agent:

Regardless of updates to this policy, and following on from the Inspector's "Matters and Issues for Examination" 1.2 ("is the plan’s approach towards the Thames Basin Heaths Special Protection Area sound?"), the Council's response is still currently inadequate. According to NPPF para 31 "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." More importantly, it must not contravene the law, i.e. the Habitats Regulations. The plan is not sound and not legally compliant at a basic level, because it relies very heavily upon the concept of SANG in the Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD, which in turn derives from Policy NRM6 of the (otherwise abandoned) South East Plan, which itself is not sound. Such a policy is only an attempt to implement the law; it does not replace the law. Laws require evidence. For more than 12 years now, no evidence has been provided that SANG is effective as mitigation. No scientific research, no trials. Surely this is a prerequisite of any legally compliant strategy, and surely 12 years is long enough to validate it properly before rolling it out on such a widespread scale. If evidence exists, it should be referenced in the planning documents. Wishful thinking is not evidence. The only study that gets referenced time and again is NECR136_2013_SPVisitorsurvey20122013, but this specifically excludes its use as evidence for SANG: "These survey results in no way test whether Suitable Alternative Natural Greenspace (SANG) provision or other measures may have been successful, and detailed monitoring of SANGs themselves is necessary to show their effectiveness." It actually showed a 10% increase in visitors to the SPA, but somewhat conveniently this was deemed "statistically insignificant". There are vague references to a further report from Natural England that was due in 2017, but where is it?

Similarly, the Key Issue 2 response in the consultation statement for the Avoidance Strategy (https://www.guildford.gov.uk/media/24947/Thames-Basin-Heaths-SPA-Strategy-SPD-2017-Consultation-Statement/ pdf/Thames_Basin_Heaths_SPD_Strategy_SPD_2017-Consultation_S.pdf) offers no actual evidence, just a rather desperate masterclass in warping the facts to make something sound successful when there's nothing to prove it. It's inappropriate for the Council to infer "success" for the strategy in this way.

What is there to stop a developer challenging the effectiveness of SANG mitigation (e.g. in court), and refusing to to pay
financial contributions, or worse, reclaiming them retrospectively?

I realize this isn't an easy issue for Council officers, as they feel obliged to conform to Policy NRM6 and follow guidance from Natural England. However, this shouldn't be done unquestioningly, considering the strategy was completely unproven when the policy was originally formulated, and is still unproven now. They have to be absolutely certain there are sufficient grounds to demonstrate they are acting lawfully since it's the Council that ends up liable. It's not just Guildford - no councils around the country should be coerced by central government into arbitrary housing targets that completely fail to take into account the percentage of land protected by legislation.

Attached documents:

**Comment: MM2 - LPMM18/1440**  **Respondent:** Elizabeth Toulson 8848417  **Agent:**

i) Housing numbers: The figures in MM2 are no longer up to date and do not provide a sound basis for the Plan or justify such extensive Green Belt loss - 360 homes not 630.

Attached documents:

**Comment: MM3 - LPMM18/1441**  **Respondent:** Elizabeth Toulson 8848417  **Agent:**

ii) There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table S2b out of date and MM3 inadequate and in need of re-examination.

Attached documents:

**Comment: MM45 - LPMM18/4782**  **Respondent:** Adrian Mills 8848481  **Agent:**

I wish to voice my concerns that the council are looking to modify the local plan in order to inflict the village of Normandy with a site of 105 new houses which equates to a 7% increase in the size of the village on a site that has been the subject to a number of previous applications that have been refused due to damage this would inflict on the greenbelt, there is a total lack of consideration for current residents with the council purely trying to demonstrate to the planning inspectors challenge, the village already suffers from inadequate infrastructure with overloaded sewers, constant flooding and too much traffic this kind of development will only increase the burden on our community, along with the lack of facilities such as shops, access to schools and GP’s, yes we have a station but you try getting a train at the weekend it is almost always a replacement bus service.

Guildford Borough Council should concentrate their efforts on utilising the many brownfield sites that exist in the borough rather than propose more building on sensitive greenfield sites such as this.

Attached documents:

**Comment: MM2 - LPMM18/2956**  **Respondent:** Rob Sewell 8849313  **Agent:**
In light of the revised ONS figures, I do think that the new build housing requirements should be revisited.

Attached documents:

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**Comment:** MM3 - LPMM18/2957  
**Respondent:** Rob Sewell  
**Agent:**

I also think that the focus in respect of the town centre should be to ensure that current retail units aren’t too high. The High St works so well because of its lower rise character. Things like House of Fraser really look quite ugly from North St. Encouraging any further high rise development would be bad. Retail is changing, and the successful retail areas are increasingly focussed on mixed use; creating an experience rather than just a bunch of shops. This should be a focus for the plan.

Attached documents:

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**Comment:** MM2 - LPMM18/3063  
**Respondent:** Sam Pinder  
**Agent:**

I’m a resident of East Horsley – my address [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

I would like to object to the proposed local plan

1. **Number of Houses (MM2)** - Last month the ONS released new household growth projections for Guildford for the plan period which significantly reduce the expected growth in the number of households from 11,142 to 6,635. This is such a massive decrease in the projected number of houses that I cannot see any situation in which it could be argued that the previous projections should continue to be used. I object to more houses than are needed being built in this area. I am particularly incredulous that, even though GBC and the Inspector, Jonathan Bore, were both aware of the likely significant reduction in population projections, (as projections were released in May 2018 showing this), they continued with the housing numbers in the local plan and instead of reducing it, the Inspector chose to increase the number of houses required to take on Woking’s unmet need.

2. **Re-opening the public examination (MM2)** – due to the massive differences between the plan and the latest ONS data, the only course of action can be to re-open the public examination by the Planning Inspector, to take these changes into account and significantly reduce the number of houses in the GBC local plan.

Attached documents:

---

**Comment:** MM9 - LPMM18/3064  
**Respondent:** Sam Pinder  
**Agent:**

1. **Policy P2: Green Belt (MM9)** – Although this policy has been changed significantly, this section has not factored in the massive reduction in the number of projected houses from the latest data released by the ONS. More than half of the plan’s housing is due to be built on land that is currently in the Green Belt – this is now no longer necessary due to the reduction in housing number requirements. There can be no justification to build such a large number of houses on the Gren Belt and choosing to ignore the new housing figures, with the consequence that land that is currently in the Green Belt will be built on and therefore lost for future generations, is frankly, criminal.
I would like the Local Plan public examination to be re-opened so that the new ONS housing data can be factored into the housing calculations so that only the houses that are required are built and no Green Belt land is built on unnecessarily.

Attached documents:

Comment: MM23 - LPMM18/4260  Respondent: Anthony Umney 8851777  Agent:

MM23 – Policy D1

- GBC is a major landowner in the town centre and should be required follow the same obligations imposed by the council as the planning authority on the other strategic site owners.

Attached documents:

Comment: MM3 - LPMM18/4258  Respondent: Anthony Umney 8851777  Agent:

MM3 – Policy S3

- There needs to be strategic designated sites in the Town Centre in order to achieve a coherent and coordinated development.
- Development rules need to be established to ensure quality of developments in the Town Centre and to regulate the height of developments to a maximum of seven storeys.
- GBC should consider adopting the Guildford Vision Group’s proposals including the new crossing or equivalent effective alternative to deliver a safer pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: Other comments - LPMM18/4256  Respondent: Anthony Umney 8851777  Agent:

From Anthony Umney BSc CEng FICE

Guilford Resident for 31 Years and a member of the Guildford Society’s Planning Group

General:

As an overall comment, I am extremely disappointed with the piecemeal development of Guildford resulting from the lack of a Town Centre Plan addressing housing, infrastructure, etc. The lack of detailed consideration of brownfield sites ahead of the proposals for major developments on Green Belt sites is contrary to Government directions. The transportation issues for the Town Centre are serious with the traffic regularly being brought to a standstill.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/3821</th>
<th>Respondent: John F. Wood 8852289</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>The examination in public must be reopened, so that the latest Office of National Statistics information can be applied. I fully support the representation made by WAG, which was written with advice from Richard Harwood QC.</td>
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<th>Respondent: John F. Wood 8852289</th>
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<tr>
<td>MM23: There is complete lack of any evidence that recent case law &quot;People over Wind&quot; has been taken into account.</td>
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<th>Respondent: John F. Wood 8852289</th>
<th>Agent:</th>
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<tr>
<td>S3: The policy for the town centre is totally inadequate and does not address the infrastructure deficit.</td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment: MM40 - LPMM18/3819</th>
<th>Respondent: John F. Wood 8852289</th>
<th>Agent:</th>
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</thead>
</table>
| Site Specific: A35 Three Farms Meadow  
1. The presence of the VOR constrains the density of the area and adding land to the south of the appeal site will not mitigate this.  
2. Land to the south is next to the Ockham Conservation area.  
3. Land to the south means that the site is more visible from the SurreyHills ANOB. |
| **Attached documents:** |

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/3815</th>
<th>Respondent: John F. Wood 8852289</th>
<th>Agent:</th>
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</table>
| MM41: The council's plan relies too heavily on improvements to the A3. These are beyond their control and there is no fixed timescale.  
MM41: It appears that GBC's transport scheme relies on insufficient modelling, especially the problems at Junction 10 of the A3/M25 interchange. Highways England RIS scheme of at least 2 years will have huge impact on this and all development that relies on these improvements, such as MM41, Site A43 (Garlick's Arch) and MM44, Alderton's Farm. |
| **Attached documents:** |
MM44: Please note inclusion above.

It appears that GBC's transport scheme relies on insufficient modelling, especially the problems at Junction 10 of the A3/M25 interchange. Highways England RIS scheme of at least 2 years will have huge impact on this and all development that relies on these improvements, such as MM41, Site A43 (Garlick's Arch) and MM44, Alderton's Farm.

Attached documents:

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4. MM47: The size of the SCNI is drastically reduced, despite the ecological grounds that apply to the entire site.
5. MM47: There is no justification for altering the SCNI boundary.
6. MM47: The biodiversity of the SCNI will be destroyed by the proposed development.
7. MM47: Case law is breached as the "Appropriate Assessment" and a "Habitats Regulation Assessment" have not been completed.

Attached documents:

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MM27, MM41, MM42 and MM48 Transport Strategy

- The traffic implications for Send and Send Marsh as a result of the above modifications are not addressed by the A3 changes and the proposed Clandon slip roads. Indeed the traffic on Send Barns Lane and Send Road will suffer an increase not merely on account of the proposed new housing but also as a result of traffic and particularly commercial traffic using these new slip roads to access Woking rather than at present accessing Woking via Guildford.
- No proper assessment has been made by the Council to any od the proposed development yet alone the modifications. Increased noise and pollution will add to the inevitable delays and gridlock on local roads.

Attached documents:

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My name is Charles Gibson and [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] I wish to object to the following proposed modifications:

MM 41 Land at Garlicks Arch Policy A43
• An increase of 37% in the number of houses proposed (from 400 to 550) is excessive
• This with other sites proposed in Send will add 770 houses to the current 1700 in Send. An increase of 45% is too much for one village to bear and will totally destroy the village feel of Send, its amenities and infrastructure
• The site is within the Green Belt and contains ancient woodland. It is subject to flooding
• Over 7000 objections were received by your council to the original number of houses. The views of local residents has totally been ignored
• The development (coupled with MM44) will join up the distinct and separate villages/communities of Ripley, Send Marsh and Send to the detriment of all three
• The increase in the number of units will put undue pressure on local roads and particularly Send Barns Lane and Send Road
• There is no provision for increased school places (and indeed further pressure on school places has resulted from the closure of Ripley Primary School) or for an increase in medical facilities which are at present fully subscribed

Attached documents:

Comment: MM41 - LPMM18/189  Respondent: Mr Charles Gibson 8853025  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

• The traffic implications for Send and Send Marsh as a result of the above modifications are not addressed by the A3 changes and the proposed Clandon slip roads. Indeed the traffic on Send Barns Lane and Send Road will suffer an increase not merely on account of the proposed new housing but also as a result of traffic and particularly commercial traffic using these new slip roads to access Woking rather than at present accessing Woking via Guildford
• No proper assessment has been made by the Council to any od the prosed development yet alone the modifications. Increased noise and pollution will add to the inevitable delays and gridlock on local roads

Attached documents:

Comment: MM42 - LPMM18/185  Respondent: Mr Charles Gibson 8853025  Agent:

MM42 Land at Burnt Common, Policy A58

• The proposed increase from 7000 to 14800 sq metres of industrial units and storage is grossly excessive and wholly unnecessary given that Slyfield in Guildford has unused capacity. There is no proven demand.
• There are no special circumstances so MM9 is contradicted.
• The site is within the Green Belt
• The Employment Land Needs Assessment showed a reduction in demand for industrial land
• On top of the 25% increase at Send Business Centre there will be a far greater concentration of industrial/storage units in Send than in any other village in the Borough.
• Undue pressure will be placed on local roads and particularly Send Barns Lane and Send Road

Attached documents:

Comment: MM42 - LPMM18/190  Respondent: Mr Charles Gibson 8853025  Agent:
MM27, MM41, MM42 and MM48 Transport Strategy

- The traffic implications for Send and Send Marsh as a result of the above modifications are not addressed by the A3 changes and the proposed Clandon slip roads. Indeed the traffic on Send Barns Lane and Send Road will suffer an increase not merely on account of the proposed new housing but also as a result of traffic and particularly commercial traffic using these new slip roads to access Woking rather than at present accessing Woking via Guildford
- No proper assessment has been made by the Council to any od the prosed development yet alone the modifications. Increased noise and pollution will add to the inevitable delays and gridlock on local roads

Attached documents:

Comment: MM44 - LPMM18/186  Respondent: Mr Charles Gibson 8853025  Agent:

MM 44 Land at Alderton’s Farm, Send Marsh Road

- The Council deleted this site from the original draft only to re-insert it at the public enquiry in July when it was impossible for local residents to object
- This site is in the Green Belt with no special circumstances. It therefore contradicts Policy MM9
- The development will detract from the heritage area of Send Marsh Green and the number of Listed buildings around it.
- Send Marsh Green (by the pillar box and the property known as Sendale) is subject to flooding during periods of heavy rainfall. As the existing storm water drains are inadequate and building on this site will only aggravate the problem
- The development (coupled with MM41) will join up the distinct and separate villages/communities of Ripley, Send Marsh and Send to the detriment of all three
- The increase in the number of units will put undue pressure on local roads and particularly the junction at Send Road and the existing dangerous 90 degree bend in Send Marsh Road by the Green.
- There is no provision for increased school places (and indeed further pressure on school places has resulted from the closure of Ripley Primary School) or for an increase in medical facilities which are at present fully subscribed

Attached documents:

Comment: MM48 - LPMM18/191  Respondent: Mr Charles Gibson 8853025  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

- The traffic implications for Send and Send Marsh as a result of the above modifications are not addressed by the A3 changes and the proposed Clandon slip roads. Indeed the traffic on Send Barns Lane and Send Road will suffer an increase not merely on account of the proposed new housing but also as a result of traffic and particularly commercial traffic using these new slip roads to access Woking rather than at present accessing Woking via Guildford
- No proper assessment has been made by the Council to any od the prosed development yet alone the modifications. Increased noise and pollution will add to the inevitable delays and gridlock on local roads

Attached documents:
MM9 Green Belt Policy

- The claim that the modifications protect the Green Belt is entirely spurious. The above modifications when taken as a whole seriously erode the Green Belt in Send
- Your council states that it will make an exception to protection of the Green Belt for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. None of the above medications are within the village of Send or Send Marsh

Attached documents:

Re GUILDFORD LOCAL PLAN

I wish to object to the modifications to the Guildford Plan. I hope this time there will be more regard taken of local views especially as it now seems that local housing requirements have been overestimated.

MM41 Land at Garlicks Arch, Send Marsh Policy A43

I strongly object to this development:

- It will destroy ancient woodland and create ribbon development from Ripley to Send thereby damaging the integrity of the two villages which go back to the time of Domesday and before.
- The new homes proposed take no account of the infrastructure required to sustain them. Both the school and the medical centre in Send are at capacity - not helped by the closure of Ripley School.
- The local roads are already very busy and 550 homes would mean thousands of extra car journeys - increasing congestion and pollution.
- If new slip roads onto the A3 go ahead this will attract many extra cars through Send and Clandon which are already too busy. More cars will also only exacerbate the A3 at Guildford which gridlocks every day as it is.

Attached documents:

MM42 Land at Burnt Common London Road, Send Policy A58

I object to this proposal. Once again this development is wrong headed - not because the site should remain undeveloped but because it is the wrong kind of development.

- A huge new industrial site is not needed and certainly not here as it will suck more traffic into the village, once again putting strain on roads and services.
- I understand the requirement for more industrial space is far from proven. I think the current space is currently unlet and that there is still capacity at Slyfield.
- This space would provide land for social housing or starter homes if good noise barriers were built along side the A3 and could also possibly provide for the traveller site, which if properly screened would be far more accessible and less intrusive than destroying Send Hill, which is too narrow for caravans and which opens out on to one of the few open green spaces in the village.
I object to this development

- This has recently been re-inserted after the previous objections were accepted. Why, especially as the housing numbers have now been called into question.
- The total number of houses proposed in Send is totally out of proportion to the size of the village.

Please LISTEN to local people. Suprisingly they actually know what is good for the local community, and it is community that is vital for the sustained happiness of an area. Yes we should build some more houses in Send but in proportion. And why have all the proposals to develop brownfield sites in Guildford seemingly rejected or overlooked. A cynic might think that developers find it easier and more profitable to build on Green Belt. Time and again they build 4 (tiny) bedroom 'executive' houses because that is where the money is, when we need starter homes and affordable homes.

Is Guildford supporting a Housing Association to facilitate this?

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The Plan continues to ignore the excess of retail use in Guildford town centre, and the current retail allocation could be re-allocated to sustainable housing.

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The objectively assessed housing need is fundamentally flawed. The Plan takes no account of the material reduction in new household formations forecast by the ONS last month, and is the Plan is accordingly unsound. It is essential that the public examination of the Plan is reopened.

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there should be no requirement for Guildford to take Woking’s unmet need. Woking is self evidently in the midst of large scale high rise residential redevelopment of the Woking town centre, and it is nonsensical to suggest that Guildford green belt has to be sacrificed when Woking’s own future plan envisages more town centre residential high rises.
MM23: Policy D1 dilutes the social dimension of the required sustainability.

Comment: MM41 - LPMM18/1888  Respondent: Mrs Mary Teague 8855425  Agent:

MM41: The modelling for the Transport strategy remains inadequate, including in its complete failure to take into account the impact of a delay of at least two years in the Highways England RIS scheme.

Site A35: I support the representation made by the Wisley Action Group (WAG).

Comment: MM9 - LPMM18/1885  Respondent: Mrs Mary Teague 8855425  Agent:

MM9: infilling in and around villages appears intended deliberately to weaken protection of the countryside.

Comment: MM2 - LPMM18/2029  Respondent: John Coleman 8855649  Agent:

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
Comment: MM23 - LPMM18/2032  Respondent: John Coleman 8855649  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens along the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/2040  Respondent: John Coleman 8855649  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion, I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/2030  Respondent: John Coleman 8855649  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM3 - LPMM18/2039  Respondent: John Coleman 8855649  Agent:
1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure the quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

<table>
<thead>
<tr>
<th><strong>Comment:</strong> MM31 - LPMM18/2033</th>
<th><strong>Respondent:</strong> John Coleman 8855649</th>
<th><strong>Agent:</strong></th>
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</thead>
<tbody>
<tr>
<td>MM31 on <strong>North Street</strong> should be amended to reflect the more flexible and less specific approach of promoting mixed-use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.</td>
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<td>MM31 A height limit for <strong>North Street</strong> is required.</td>
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<td>MM31 There appears to be no allocation for an <strong>all-direction bus interchange</strong>.</td>
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<th><strong>Respondent:</strong> John Coleman 8855649</th>
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<tr>
<td>MM32 A height limit for <strong>White Lion Walk</strong> is required.</td>
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<th><strong>Respondent:</strong> John Coleman 8855649</th>
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<tr>
<td>MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at <strong>Slyfield</strong> and green roofs for commercial buildings within the site to minimise the impact on views from the AONB.</td>
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</table>
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

**Comment:** MM41 - LPMM18/2037  **Respondent:** John Coleman 8855649  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

**Comment:** MM44 - LPMM18/2038  **Respondent:** John Coleman 8855649  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

**Comment:** MM48 - LPMM18/2028  **Respondent:** John Coleman 8855649  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that
the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points
made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West
Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest
terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg
through East Clandon) which will be used to avoid the inevitable traffic build-ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the
north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of
a £1million of developer-funded mitigation measures for the A247 through West Clandon will not change the fact that the
A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of
listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in
the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of
congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was
pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the
Gosden Hill development so that it connects to the A3. Together with Park Lane, this forms a good, full-width road
which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique
problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and
East Clandon. At most, it could be used to make the A247 marginally safer for pedestrians and cyclists by improving
speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size
from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these
North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways
England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the
A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This
would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common,
avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of
Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clndon section of the A247**

The A247 through the village of West Clndon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

**Attached documents:**
MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM45  -  LPMM18/1457  **Respondent:** Martin Sweeting 8857025  **Agent:**

I am writing in response to the consultation on the proposed Guildford Local Plan and specifically the Main Modification 45, i.e. MM45, dealing with Policy A64.

In this regard, I wish to register my strong objection to this Modification as it proposes a major new housing development on existing Green Belt land without any justification of the ‘exceptional circumstances’ that are needed in order to redraw the Green Belt boundary in Normandy.

Such a development will substantially threaten the rural character of Normandy and, indeed, previous refusals of planning applications on this site have stressed its extreme sensitivity and the damage that would be done to the openness of the Green Belt should development be permitted thereon.

Furthermore, there has been no accompanying improvements to infrastructure proposed in the Modification. The access road (Glaziers Lane) is narrow, already heavily used by large lorries, and constrained by an even narrower railway bridge with poor visibility from the south – the additional traffic load due to the proposed development would give rise to dangerous congestion. The sewerage systems in Normandy are already overloaded and this additional major housing development would exacerbate this problem. The site proposed is also adjacent to the Strawberry Farm waste management site and I note that there is no assessment of the possible environmental hazards and necessary mitigation.

I also note that expert opinion has identified an exaggeration (by ~45%! ) of the overall housing number in the GBC Local Plan and it appears that insufficient emphasis has been given to capitalising on brownfield sites in Guildford town centre and elsewhere in the Borough rather than the easier option of more building on greenfield sites. This proposal has been inserted into the Local Plan at a very late stage and without the extensive consultation of local inhabitants who have shown in their responses to previous Local Plan consultations that they care passionately about preserving the rural nature of their community.

In conclusion, I request that you take note of my strong objection to this proposed Main Modification 45 as an inappropriate development on Green Belt land without any justification of the ‘exceptional circumstances’ needed that would have a highly detrimental impact on the local community.

**Attached documents:**

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**Comment:** MM51  -  LPMM18/4348  **Respondent:** Dawn Childs 8857057  **Agent:**

Amendment 1 Horsleys - West Horsley (South) (MM51)

Please take this email as approval of the above modification. The previous boundary was indefensible and therefore not valid argument to bring greenbelt land into the village settlement area.

We must do all that we can to protect our Greenbelt and this is prime open space and would dramatically set the wheels in motion to change the landscape of the village forever.

**Attached documents:**
1. Based on the latest ONS data, Guildford can achieve economic growth with an extra 360 homes a year, which is considerably lower than the 672 extra homes a year which have been put forward in the draft Local Plan.

2. The new figure of 360 homes means development in the Greenbelt on the scale proposed in the Plan can no longer be justified and that one or more of the Greenbelt sites could be saved.

4. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination.

5. The grounds for green belt development are inadequate because of 1 and 3

11. I object to the level of Pre-determination at all levels of this local plan preperation.

12. I object to Guildford taking any of Woking unmet housing need. Guildford has more GBelt

13. The Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

Attached documents:

3. The Council should prioritise early regeneration of the town centre. The Inspector rightly identified much of the Town Centre as not worthy of protection and ripe for development. The change in retail habits further allows town centre land to be used for Housing and regeneration. The Guildford Vision Group have stated that the Town Centre could enable 2500-3000 houses which would save a further Greenbelt (so called) Strategic Site on the Greenbelt being developed.

3. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit.

Attached documents:

If site allocations A26 and A26a are taken out of the green belt for development, as proposed in the draft Local Plan (which, incidentally, I object to completely), then there does not appear to be any logic behind not removing Down Place Estate from Greennbelt as well due to:

1. Taking Down Place Estate out of Greenbelt would result (according to the NPPF) in a more defensible boundary than is currently being proposed as it follows identifiable features on the ground (ie a road with a high wall forming a Victorian walled garden, which would screen development to the north). Currently what is being proposed as the boundary to the new urban area, comprises nothing more than a 2 foot high rabbit fence at the end of a private garden. the
NPPF requires the local plan to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

2. If development went ahead as currently proposed in the modified local plan, then the land at Down Place Estate would form a small island of Greenbelt land surrounded on three of its sides by development. This land at Down Place Estate, once isolated by surrounding development, would be let fulfilling none of the purposes of green belt. This is in stark contrast to the surrounding land that is proposed to be taken out of Greenbelt, which currently fulfils all five purposes.

3 Land at Down Place Estate has the same designation (AGLV) to adjacent land on site allocation A26, which forms part of the proposed development and is separated by a low rabbit fence. The area proposed to take out of Greenbelt does not affect the views from the southern slopes of the Hogs Back as protected by trees to the south. There would be an inconsistent application of planning rules to keep Down Place Estate in Green Belt if development was to take place all around.

4. It seems strange that the boundary of site allocation A26 follows the same farm track along its southern edge but suddenly deviates from this line at the very point where a high wall provides a more defensible boundary and screening. The result of this is a contorted boundary around Down Place Estate to omit land not owned by the University of Surrey. This does not appear to be consistent with NPPF (68 and 69).

5. Down Place Estate includes Brownfield land (the footings of army barracks, which were used for accommodation by the local council after the war as well as the site of two former cottages). This again makes Down Place Estate more suitable to be removed from Green belt than any of the green fields / working farmland that form the existing proposed A26 and A26a site allocations.

The diagram overleaf shows the southern part of the existing boundary for site allocation A26 (as proposed by GBC in blue), with a more defensible boundary highlighted in red. If the development of Blackwell Farm goes forward into the Final plan, then modifications to the boundary on the south west corner of site allocation A26 should be made to include Down Place Estate (as indicated by the red dotted line). This would square off the corner of the site allocation A26, provide a more defensible boundary and address the points made above.

5. MM36 Blackwell Farm should not be removed from the Greenbelt. Revised housing need figures suggest there is no need for development of this site.

8. MM36 Blackwell Farm, I object to the following modification within Policy A26: The increase in employment space on the Surrey Research Park in Allocation paragraph 3 from 30,000 to 35,000m2. Whilst I welcome densification of development in the right areas; any increase in office space at this particular location would attract additional traffic and put pressure on a junction that would already be over capacity. There are plenty of existing available office sites close to the University and town.

Attached documents:  R Nagaty response site allocation map.pdf (754 KB)

Comment: MM37 - LPMM18/5470  Respondent: Ramsey Nagaty 8858113  Agent:

If site allocations A26 and A26a are taken out of the green belt for development, as proposed in the draft Local Plan (which, incidentally, I object to completely), then there does not appear to be any logic behind not removing Down Place Estate from Greenbelt as well due to:
1. Taking Down Place Estate out of Greenbelt would result (according to the NPPF) in a more defensible boundary than is currently being proposed as it follows identifiable features on the ground (ie a road with a high wall forming a Victorian walled garden, which would screen development to the north). Currently what is being proposed as the boundary to the new urban area, comprises nothing more than a 2 foot high rabbit fence at the end of a private garden. the NPPF requires the local plan to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

2. If development went ahead as currently proposed in the modified local plan, then the land at Down Place Estate would form a small island of Greenbelt land surrounded on three of its sides by development. This land at Down Place Estate, once isolated by surrounding development, would be let fulfilling none of the purposes of green belt. This is in stark contrast to the surrounding land that is proposed to be taken out of Greenbelt, which currently fulfils all five purposes.

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5. Down Place Estate includes Brownfield land (the footings of army barracks, which were used for accommodation by the local council after the war as well as the site of two former cottages). This again makes Down Place Estate more suitable to be removed from Green belt than any of the green fields / working farmland that form the existing proposed A26 and A26a site allocations.

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6A MM26a The new proposal of using Down Place as the access and exit road to Blackwell Farm should not be allowed, it is far too steep for the purpose, and is bounded on both sides by beautiful trees which should not be removed for road-widening because they contribute greatly to the landscape and have historic interest.

I object to the inclusion of policy A26a (access road to the Blackwell Farm development site) as a separate policy to the Policy A26 (the Blackwell Farm allocation).

4. MM37 The proposed land for an access road between the A31 and Blackwell Farm would harm the landscape.

6. MM37 The proposed land for an acess and exit road between the A31 and Blackwell Farm would harm and destroy beautiful trees and result in attracting even more traffic. The road would, as stated by Surrey University to the old SE Dev Agency, not relieve traffic but rather worsen the traffic and congestion. Add 2000-3000 extra cars from the proposed new housing and schools at Blackwell Farm and transport in the whole area will grind to a halt. The proposed access and exit road at Blackwell Farm will be detrimental to the air quality and affect the AQMA at the Street, Compton increasing traffic and pollution. Development which increases traffic at an AQMA is not allowed.

Attached documents: R Nagaty response site allocation map.pdf (754 KB)
2. There is too much reliance on A3 improvements and they are beyond the council's control.

9. MM41 Transport Strategy

Traffic is already at intolerable levels causing congestion, delays and damage to the environment and to business, the extra housing with limited new infrastructure will make life in and around Guildford intolerable.

Attached documents:

10. I object to the addition of new sites at the examination without proper consultation

Attached documents:

Policy S2 - MM2

I would ask the Government Inspector to reduce the housing targets. The stated housing requirement is not a sound basis for the Local Plan or justification for such an extensive loss of Green Belt land and should be re-examined as a result of the new ONS forecasts. It has been shown by Neil McDonald that 360 not 630 +42 houses would support the economic growth proposed by the Government Plan inspector. Such a high figure would impact unnecessarily on the Greenbelt.

In our area I am concerned with the possible building in the Hornhatch, Chilworth (MM43) vicinity which would have a damaging effect on Blacksmith and Halfpenny Lanes. These were not created to tolerate heavy traffic flow and already see large amounts of traffic using them to avoid the A 281 into Guildford and the traffic jams that plague residents and visitors every day.

I would ask that GBC heeds the ONS forecasts and would put the following questions to the Council:

Why do we need to accommodate university students in the town centre when this could be done on campus?

Why has the Council not examined the brownfield sites available in the town for development instead of taking the easier option of building on the Green Belt?

Why does Guildford have to pick up Woking’s shortfall in their housing quota? This would negatively impact on our Green Belt and is not appropriate. Woking’s case needs to be re-examined especially as their figures have been reduced.

Attached documents:

476 of 2554
### Policy 3 MM3

I would urge Guildford Borough Council to adopt the Guildford Vision Group proposals, we deserve a cohesive, sensible plan to enhance our historic town. We need better pedestrianisation, solutions to our dire traffic problems, quality, attractive developments especially near the riverside, all provided by the Vision Group’s Plan. What we do not need is piecemeal developments that deliver none of these.

**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5874</th>
<th>Respondent: Clare Bevan 8859553</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>I object to various aspects of the proposed main modification (MM) to the Local Plan (2017) as follows</td>
<td></td>
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<tr>
<td>1. The MM2 housing target is wrong as it does not use the latest ONS population statistics</td>
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<tr>
<td>2. MM2 - if it requires green belt release, why should Guildford take Woking’s unmet need?</td>
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<tr>
<td>3. The addition of another 500 house in Send would have a severe impact on the Portsmouth Road through Ripley which has not been properly considered</td>
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<tr>
<td>4. The addition of land to the sites of the TFM development does not mitigate the density issue as much of the added land is constrained by the VOR</td>
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<tr>
<td>5. Strategic sites such as TFM should not be exempt from design constraints</td>
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**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment: MM23 - LPMM18/5876</th>
<th>Respondent: Clare Bevan 8859553</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>1. MM23 (policy D1) by modifying the social dimension for sustainability makes things for developers but not the people who will live in and around new housing</td>
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</tbody>
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**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment: MM3 - LPMM18/5875</th>
<th>Respondent: Clare Bevan 8859553</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>1. On line shopping means less space should be allocated to retail and those sites in town could be allocated to sustainable housing</td>
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**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment: MM50 - LPMM18/5878</th>
<th>Respondent: Clare Bevan 8859553</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>1. MM47 there are no grounds for reducing the SNCI boundary when the whole site at TFM qualifies on ecological grounds</td>
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</tbody>
</table>

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The examination in public must be opened so that the latest Office of National Statistics can be used

Yours Faithfully

Attached documents:

<table>
<thead>
<tr>
<th>Comment: MM14 - LPMM18/5904</th>
<th>Respondent: Claire Yates 8859585</th>
<th>Agent:</th>
</tr>
</thead>
</table>
| MM14. I can see no justification for further allocations for leisure and retail. High street shopping is declining and this area is adequately provided for re leisure. 
I hope you will bear these comments in mind when finalising the Local Plan and in particular reduce the horrendous proposed increase in both housing and industrial development in the Send area. | | |
| Attached documents: | | |

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5885</th>
<th>Respondent: Claire Yates 8859585</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM2 Spatial development strategy and housing numbers – the latest ONS figures are for a reduced population increase of 301pa. Guildford could now expect to have around 5,500 fewer households at the end of the plan period that was predicted by the data that formed the basis of the debate at the Examination. Modifications should only be made if the Plan is found unsound, which was not the case. However, additions were made in the Send area as below. Send parish now accounts for 56% of proposed development supply in villages (based on the table at MM2). This community cannot support all this development, which will completely change the character of the parish, with its three distinct settlements of Send, Send Marsh and Burnt Common, as reflected by our parish logo:</td>
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<td>Attached documents:</td>
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<tr>
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<th>Respondent: Claire Yates 8859585</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM23 states: all new development will be designed to maximise the opportunity for and linkages between green spaces and public places, and include high quality landscaping that reflects the local distinctive character. The allocations at Alderton’s and Garlick’s Arch are designed to destroy green spaces and the local distinctive character! MM23 further requires that a new site “provides access to services from a range of providers.” The above two sites will not be able to fulfil this requirement since the school is at capacity and Ripley School has recently closed; the Medical Centre is at capacity; and there are only small shops locally.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM29 - LPMM18/5900</th>
<th>Respondent: Claire Yates 8859585</th>
<th>Agent:</th>
</tr>
</thead>
</table>
ID4 MM29: The Council will maintain, conserve and enhance biodiversity. How is that possible with such a lot of development on Green Belt land??

Attached documents:

Comment: MM40 - LPMM18/5902  Respondent: Claire Yates 8859585  Agent:

A35 MM40. The increase in the minimum floor space at Burnt Common warehouse site is unreasonable due to the already heavy traffic in and around this site. The Employment Lands Needs Assessment showed a reduction in demand for Industrial Land. There is no need for new industrial sites when Slyfield has unused capacity. Other off-site highway works to mitigate the impacts of the development makes no mention of the A247 through Send, which would inevitably carry more traffic from the Wisley Airfield development to Woking.

Attached documents:

Comment: MM41 - LPMM18/5889  Respondent: Claire Yates 8859585  Agent:

MM41 – Policy A43. At the Public Enquiry, the only reason put forward for increasing the housing number at Garlick’s Arch to 550 was that the developers would be able to help fill quotas in the first five years of the Plan. That is a completely spurious planning argument. The objections to the original 400 houses were clearly expressed: problems with traffic, flooding, contaminated land, disturbance to ancient woodland and the fact that this is Green Belt land. This housing would link Burnt Common and Ripley, which are currently separated by green land. There is an acknowledgement, in the addition of wording at MM41, of the argument that Garlick’s Arch is poorly related as a site to both the existing built form of the villages and the services provided by Send. Send does not have the capacity to service this additional growth in housing. MM17.

Attached documents:

Comment: MM44 - LPMM18/5887  Respondent: Claire Yates 8859585  Agent:

Site MM44. The land at Alderton’s Farm was removed following the 2014 consultation. It is now suggested to add it back. It is Green Belt and flood land and those reasons for it not being built on are still valid. It also forms a green break between Send and Send Marsh.

MM44 “Opportunities”
(1) Green corridors and linkages to habitats outside of the site
These are not opportunities! The existing corridors and linkages will be reduced!

(2) Encourage connections with services and facilities in the village.
These are already at capacity. As for shops, we have recently lost both the Post Office/ General Store and Patel’s newsagents, which have both become residential accommodation. And the local hairdresser is closed.

Attached documents:
There is enough existing brownfield land that GBC has given permission for the developers to build on, which should be used to meet the housing need. GBC do not put enough pressure on the developers to build on brownfield land, as the developers are waiting to make an extraordinary amount of money by building on our precious Green Belt. The Inspector should take this into account when making decisions, and the Green Belt should only be built on as a very last resort when all the Brownfield sites have been built on.

We are losing our wildlife at an extraordinary rates, lots of birds species and hedgehogs are down by 80% in the last 20 years.

Green belt land is disproportionately targeted overall in the current Plan especially as it relates to the Inspector’s proposed modifications in the Send area. (MM9 Green belt policy.)

Green belt land is there as a buffer between Send and the surrounding villages, Woking and Guildford, and it is not reasonable for Send village to have grow to one and a half times in size. We do not have the infrastructure, and local schools such as Ripley First School and St Bedes have been closed down, and Send First School is already over subscribed.

**Attached documents:**

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This Main Modification is wholly inappropriate, it has been refused planning on two previous occasions on Greenbelt grounds.

The Main Modifications appear to add an additional 500 homes to the Local Plan which is already based on grossly over estimated numbers therefore I would ask the Inspector to reopen the Examination.

**Attached documents:**

---

I write to object to the Guildford Borough Council local plan and ask that the hearing be reopened on account of the following reasons.

MM2. The projection for future housing has been seriously overstated. The need for future retail business has not been correctly estimated in view of online shopping.

MM2. We understand the projections for housing need are grossly exaggerated and too little account has been taken into account in respect of the future need for retail businesses.

**Attached documents:**

---

This Main Modification is wholly inappropriate, it has been refused planning on two previous occasions on Greenbelt grounds.

The Main Modifications appear to add an additional 500 homes to the Local Plan which is already based on grossly over estimated numbers therefore I would ask the Inspector to reopen the Examination.

**Attached documents:**
I write to object to the local plan for the following reasons.

MM41. The transport infrastructure cannot possibly cope with so much development in the Send, Ripley, Ockham area and particularly relating to the proposed changes on the A3 and J10 which are still being debated. Furthermore existing travel facilities are inadequate to take large scale developments scheduled for this area.

MM41. The plans for the A3 and J10 are still open for discussion and will seriously affect the transport and infrastructure for the forthcoming developments.

Attached documents:

Comment: MM9 - LPMM18/1443  Respondent: Mr & Mrs Michael and Jill Simmonds 8861697  Agent:

I write to object to the Guildford Borough Council local plan and ask that the hearing be reopened on account of the following reasons.

MM9. Further thought should be given to preserving the countryside with inappropriate infilling.

Furthermore not enough thought has been given to the demands of VOR. The addition of extra land does not help the density of building at

MM9. More thought should be given to preserving the countryside and consideration for Wild Life. As a general comment there is too much development scheduled for this part of Surrey and for the above reasons I ask that the hearing should be reopened.

Attached documents:

Comment: MM2 - LPMM18/3823  Respondent: David Smith 8862145  Agent:

I want to object to the Local Plan on the grounds detailed in the response made by Guildford Vision Group. In particular, I consider the plan to use Green Belt land before having exhausted Brown Field sites in the Borough is against the rules and common sense, and unnecessary.

Attached documents:

Comment: MM3 - LPMM18/3824  Respondent: David Smith 8862145  Agent:

The central area of the town should be used for housing and the reduction of traffic, for a solution to the problems caused by through traffic, and for provision of housing land along the river corridor (as proposed in the Allies and Morrison Masterplan – approved by GBC). The Plan should undertake to invest in infrastructure for housing, pedestrian movement. The dependence on Retail is excessive and irrelevant in the internet age. Why has the Masterplan by A&M been shelved?

Attached documents:
RE: MM45 dealing with Policy A64

I have concerns about the proposal to build 105 houses in the above mentioned location within Normandy, Guildford and the threat it poses to the local environment and rural character of Normandy.

I do not agree with the councils proposal to consider green belt land for building new homes, here there is plenty of brownfield sites within Guildford that can be considered to build upon.

Bearing in mind that the requirement for additional homes has been overstated by 45%.

I feel GBC has not considered all the brownfield sites that are available to build any required housing facilities.

I feel the Council has not considered any of the previous refusals of planning applications on this site that has stressed its extreme sensitivity and the damage that would be done to the openness of the Green Belt should development be permitted on it.

I fail to see that GBC has stated any exceptional circumstances to readdress the boundaries of Greenbelt in Normandy.

The area in the proposal has not taken into consideration all previous refusals for planning applications on this site have clearly highlighted its extreme sensitivity and the damage that would be done to the openness of the Green Belt should development be permitted on it.

I feel that consideration to build on this site has been stealthily inserted into the plan without justification. I feel this goes against the principles of a consultation held previously, where the residents of Normandy have made it clear in previous responses that they value and passionately care about preserving the rural landscape of their community.

No proposals have been considered to improve the infrastructure of the village to support the increase in housing, including utilities, sewerage and drainage and increase in traffic. With most households owning two or more cars we would expect to at least 200 more cars on the roads in Normandy, which not only harms the environment but has the potential to cause significant rise in the volume of traffic within the village.

Any build of this scale would have an impact on the Surrey Hills Area of Outstanding Natural Beauty [AONB].

The quantity of houses suggests that they will be more larger than the average bungalow and the proposed homes would not be in character of the local area where the likely size of property is set to be greater than 2 storeys. This would be completely out of keeping with the rest of Normandy/Flexford and would have an adverse impact on the view from the Hog’s Back in the AONB.

I question the councils proposal where the Sustainability Assessment that accompanies this proposal confirms that of all the sites proposed for additional growth in this latest version of the Plan, Flexford is the smallest and most rural, it states that “There are no existing facilities in Flexford and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality in this way.”

In conclusion, I must ask you amend the Local Plan to utilise brownfield land rather than green field sites.

Attached documents:  Local Plan comments_Oct 2018.docx (16 KB)
Local Plan Consultation submission by 23rd October 2018

It is clear the Planning Inspector needs to re-open this plan; the plan needs to be re-examined. It should not progress with a few amendments but needs for more verifiable evidence; at present it is unsound which might lead to a Judicial Review.

Here are a few examples why it should be re-considered: -

There is a "sustainable corridor" going from no-where to no-where. It does not seem to link into the current road, footpath, cycle track infrastructure and there is a clear path showing how this much happen, including how it links westwards with the SOLUM rail station project, and eastwards into Guildford town centre.

At the Planning Inquiry, Jonathan Bloor, the Inspector, clearly asked GBC to prepare a Town Centre Plan (which was not produced at the inquiry). The few pages of words submitted are NOT A PLAN. There is no empirical evidence, nor clear view, as to how these words related to a verifiable plan.

Policy 3 should have been re-written, but it is not clear that this has been done, nor it reflects actual meetings held with the likes of GRA, GGG, G.Soc., GVG and others to reflect their views, as clearly requested by the Inspector. Were there any, and where is the Agenda and Minutes from each meeting? There may have been brief short meeting, but there is no evidence any of the ideas have been used from these very knowledgeable and highly qualified organisations.

There is no evidence that there are clear plans to identify additional site for residential development, in the centre of Guildford. If GBC can identify sites on the Green Belt for development (many without adequate transport & other infrastructure) it should ALSO identify sites in the centre of Guildford.

Even currently, and if there are more residents in the central area (and even more living within the hinterland of Guildford, their main town centre), the infrastructure needs totally overhauling, and up-grading. There is almost no clear evidence: -

- there are improved flooding prevention plans,
- there will be a substantial reduction in the air pollution (one of the worst towns in Surrey),
- there are no clear improvements for pedestrian movement in the existing town centre,
- there are no proposals to reduce road accidents (one of the worst towns in Surrey),
- there is no evidence that GBC intend to reduce the traffic congestion (THE worst town in the UK). The 40 year old gyratory system is notoriously congested and highly dangerous for cyclists.
- Where extra schools, doctors surgeries and other facilities will be located.

This letter is written in a private capacity as a local resident since 1986

Attached documents:

Comment: MM1 - LPMM18/43  Respondent: Grillo LLP (Mr Tom Grillo) 8865569  Agent:

Modification MM1, item 4.1.4 appears to me to say that the Guildford Planning Policy is to ignore the NPPF and any SSSI and Bird and Habitat Directive, and the Thames Basin Heath Special Protection Area altogether. Those national and international policies must not be ignored.
Elsewhere, there are changes but in any event I think the Council needs to be careful as to any changes that the meaning of the word “Affordable” is likely to have as the Government and the Ministry of Housing, Communities and Local Government give modifications to the meaning of the word “Affordable”.

Attached documents:

**Comment:** MM41 - LPMM18/5987  **Respondent:** David Williams 8865665  **Agent:**

**GUILDFORD LOCAL PLAN OBJECTION**

I refer you to my comments submitted in my letter of 18/7/2016. The proposed revisions to the Local Plan not only disregard the serious social, economic and environmental objections that I and many other local residents have raised, the increased numbers of houses and industrial area grossly exceeds the strategic errors in the previous plan.

I am gravely concerned about the integrity of Guildford Borough Council planning intentions to the village of Send. The increased proposals are heavily loaded on our community. This appears to be politically motivated because Send residents replaced our two previous Conservative councillors with independent councillors. There appears to be a deliberate intention to dump excessive development in Send, or that the Planning Council have deliberately ignored the representations of our Councillors. It is a grim reflection on the integrity of all those direction the planning policy of Guild Borough Council.

I am also concerned that green belt land in the village is I understand owned by a member of the Government. Although not identified in the current plan the proposed urbanisation and relaxation of Green Belt boundaries of the Parish of Send potentially increases the development potential and land value of this site. Was this ownership known to the Inspectors team when they proposed to intensify the scale of development in the revised local plan? This raises question about the integrity of the current planning process.

The housing supply in Send has been recently compromised by the decision of Vision Engineering to abandon its commitment to replace its old factory site with residential housing. Instead it has sub-let the old factory for other commercial and industrial use.

It appears that the original planning consent for the new Vision Factory omitted the condition that the old factory should be demolished once the company moved to the new factory. This appears to be a grave and curious planning omission. Furthermore the Council appears to have taken no action about this change of land use in the village.

These changes must be taken into account in reassessing additional residential and industrial use in Send’s Green Belt. Additional industrial use has been tacitly granted. The opportunity for 50-70 or more new residential properties has been discarded. The revised plan should be amended accordingly.

For all these reasons I suggest that the transparency of the Local Planning process as it affects Send is now in grave doubt. The Council should be prepared for formal legal challenges and investigation.

**Regarding MM41 Land at Garlics Arch, Send Marsh, Policy A43**

As I described in my previous letter the site at Garlics Arch, adjacent to the derestricted A3, is unsuitable for new residential development because of the severe noise and environmental pollution of the A3 corridor. These environmental conditions are likely to affect the physical and mental health of residents, as in many other traffic regions.

Guildford already has a shameful reputation for locating a traveller site adjacent to the Blackwater Valley highway. To locate further traveller sites adjacent to the A3 is scandalous.

In accordance with national planning policy there should be at least a 100 metre buffer zone between the A3 and any new residential development at Garlic’s Arch.
For this reason the original proposal for 400 properties plus traveller or circus accommodation was not appropriate. To increase this to 550 is utterly irresponsible and may even justify a Human Rights action on behalf of any Traveller sites intended within 100 metres of the A3.

Attached documents:

**Comment: MM9 - LPMM18/5988**  **Respondent: David Williams 8865665**  **Agent:**

**MM9 Green Belt Policy**

As I explained in my previous objection the proposed insetting areas will facilitate development applications for up to 1000 more houses in Send. This would more than double the latest revised plan.

The road and sewage infrastructure in the village and especially along the A247 from Send Road where I live to Old Woking are totally inadequate to take the proposed scale of additional developments.

**Conclusions**

Local infrastructure and especially transport are barely meeting existing demands. The new Local Plan with its new insetting proposals, and the increased housing and industrial site targets, appear likely to encourage far more new housing developments far in excess of local infrastructure capacity.

GBC used to have a courageous reputation for maintaining realistic development strictly within clearly defined planning guidelines, against the predatory ambitions of many developers. In the last 5-10 years it has become difficult to maintain confidence in the Council’s planning and planning control roles.

These most recent changes to the Local Plan suggest that political considerations and interests locally and at Government level are overriding all sensible planning considerations for the future of Send. I would like to be proved wrong.

Attached documents:

**Comment: MM41 - LPMM18/2285**  **Respondent: P A Clarke 8875361**  **Agent:**

Re: Guildford Local Plan Main Modifications - Send / Burnt Common

Please see my following comments regarding the modifications to the draft plan for Send / Burnt Common:

- **MM41 I OBJECT to the proposed increased by over a third of the number of houses to be built on the land at Garlick's Arch. No exceptional circumstances exist to develop this beautiful site with an area of ancient woodland; an area that is also subject to frequent flooding. The surrounding roads cannot cope with the additional traffic that would be generated by the 550 planned homes. Development here would join up the villages of Ripley and Send which defeats the key objective of the Green Belt. Destroying the trees and greenery which help absorb noise and air pollution from the A3 will mean higher pollution in our villages. There were 7,000 objections to the previous proposal of 400 houses yet these objections seem to have been totally ignored and the number increased.**

Attached documents:
Comment: MM42 - LPMM18/2286  Respondent: P A Clarke 8875361  Agent:

MM42 I OBJECT to the proposed increase in the size of the industrial development on the land at Burnt Common, London Road. The size of the area has been more than doubled from 7,000 sq m to a minimum of 14,800 sq m when the demand for industrial land is falling. There is no need to build industrial units here in the Green Belt when there are still empty brownfield industrial sites in the borough at Slyfield. The impact of additional car and HGV traffic generated by this scheme will place an additional burden on the already overcrowded local roads; the Burnt Common Roundabout at the junction of the B2215 and A247 being difficult enough to navigate now in the rush hour without any additional traffic.

Attached documents:

Comment: MM44 - LPMM18/2287  Respondent: P A Clarke 8875361  Agent:

MM44 I OBJECT to the use of this Green Belt area to be used for the building of 120 homes when there are no special circumstances and it will add yet more traffic to our already overstretched roads.

In spite of many thousands of public objections raised against previous versions of the plan regarding building on the Green Belt in such high numbers, no effort has been made to address these concerns with these modifications. In fact the number of houses has increased and a large increase in planned industrial space has been made. If the above modifications were to go ahead together with all the other planned housing developments planned for Send then there will be an increase of 45% of housing in the village. The local infrastructure cannot cope, the roads will become gridlocked and there will be increased noise and pollution. We need to keep the Green Belt sacrosanct as stated in government policy.

Attached documents:

Comment: MM2 - LPMM18/1974  Respondent: Sean Gilchrist 8875969  Agent:

1.  **The Guildford Residents' Association's Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
Comment: MM23 - LPMM18/1977  Respondent: Sean Gilchrist 8875969  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of “**green approaches**” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

Comment: MM23 - LPMM18/1985  Respondent: Sean Gilchrist 8875969  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

Comment: MM3 - LPMM18/1975  Respondent: Sean Gilchrist 8875969  Agent:

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

Comment: MM3 - LPMM18/1984  Respondent: Sean Gilchrist 8875969  Agent:
1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

   MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

   MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

   **Attached documents:**

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**Comment: MM31 - LPMM18/1978  Respondent: Sean Gilchrist 8875969  Agent:**

   MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

   MM31 A height limit for **North Street** is required.

   MM31 There appears to be no allocation for an **all-direction bus interchange**.

   **Attached documents:**

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**Comment: MM32 - LPMM18/1979  Respondent: Sean Gilchrist 8875969  Agent:**

   MM32 A height limit for **White Lion Walk** is required.

   **Attached documents:**

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**Comment: MM33 - LPMM18/1980  Respondent: Sean Gilchrist 8875969  Agent:**

   MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

   **Attached documents:**

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**Comment: MM35 - LPMM18/1981  Respondent: Sean Gilchrist 8875969  Agent:**
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41  -  LPMM18/1982  **Respondent:** Sean Gilchrist 8875969  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment:** MM44  -  LPMM18/1983  **Respondent:** Sean Gilchrist 8875969  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment:** MM48  -  LPMM18/1973  **Respondent:** Sean Gilchrist 8875969  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

Attached documents:
MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM45 - LPMM18/654  Respondent: Ms Josephine Holliday 8876321  Agent:

Would you please take into consideration my following comments regarding the consultation and proposed development of A64 land adjacent to Wanborough railway and Glaziers Lane.

The field in question is green belt land. This field would join the settlements of Normandy and Flexford thereby leading to the urbanisation of our village community. To put 105 houses on the field and drain the beautiful lake of its wildlife is beyond comprehension. This space would not take 105 decent sized houses with 210 parking spaces unless the intention was to put up blocks of flats which is not in keeping with the surrounding houses. Where are 105 cars going to park, as I understand that there is only to be one parking space per residence. How can you get 105 cars down Glaziers Lane right at the bottom of the railway bridge without an accident waiting to happen. Cars park in Culls Road right by the entrance already to save money in parking fees to use the station which is dangerous as cars have to go on the wrong side of the road to exit and cars on Glaziers Lane cannot turn into Culls Road because the entrance is blocked. What a blot on the landscape this large development would be within such a pretty area looking down from the A31 Hogs Back. This area of outstanding beauty would have an adverse effect on the Surrey Hills.

Where would the deer go that roam across the road to go into the countryside beyond?

Having just had to wait three weeks for a doctors appoint (and that was a telephone appointment not actual attendance) how do you envisage an extra 210+ patients being able to be integrated into the Normandy/Fairlands doctor and dental surgeries.

The local infrastructure is old and needs attendance, how does the council envisage connecting into an already over stretched pipe works to accommodate these residences, and strengthen and widen Glaziers Lane for all of the traffic now having to use it.

This land is GREEN BELT land and not for use for housing. Surely there are plenty of brown filled sites in the Guildford area. Why have residents not been consulted on this potential development. If Guildford Borough Council had given permission over the decades for infilling for housing we might not be in this position. Instead they have been very strict to say that no building could take place in Glaziers Lane from bridge to bridge, which would take in this site. What has changed the borough’s mind and if this development takes place then presumably every house down Glaziers that is large enough to have more houses on their land will not be refused permission as has happened over the last 20 years or so. Just because the government requires more housing over all of the country the answer is not green belt land. Housing is required in Guildford town and on the University and Sports Park by the Royal Surrey Hospital, where there is a perfectly good field not being used by Tesco’s.

Normandy has suffered long and hard over many years with travellers sites and always seems to be the parish/village that seems to be chosen for any and every proposed development “Oh Normandy will do we can stick it there” without no care of goodwill to the residence in that area. Surrey Council should look at all of Surrey and not always think that just because Normandy is rural that they can stick housing there, which in essence would mean that we were no longer a village and become part of Guildford town.

Please, please, take my very personal comments to heart and rethink this very large proposal and explain why you are building on GREEN BELT LAND when surely there must be other land that can be used within Guildford Borough Council.

Attached documents:
Comment: MM13 - LPMM18/5385  Respondent: Judith Allen 8880353  Agent:

MM13 There is outdated and over allocation of retail space in the town centre, the rise of online shopping trends are not being taken into account.

Attached documents:

Comment: MM2 - LPMM18/5383  Respondent: Judith Allen 8880353  Agent:

I write to support The Wisley Airfield Action Group's representations and objections to the above which was written with advice from Richard Harwood QC.

I also write to object to the main modifications Guildford Borough Council's Draft Local Plan on the following grounds:

MM2 The housing target is inaccurate and therefore a public hearing needs to be re-opened in order for the latest figures from the Office of National Statistics regarding household projections can be taken into account.

MM2. There is no requirement for Guildford to take Woking's unmet need as this will mean further release of green belt land.

The Council has not followed its policy of requiring development first in the town centre, then urban area, brownfield followed by land in villages and green belt land. 500 houses in Send will be car dependent and have a negative impact on Portsmouth Road, Ripley have not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/5386  Respondent: Judith Allen 8880353  Agent:

MM23

this reduces the social dimension of sustainability, walking distances, pedestrians, cycling etc, this makes it easier for developers.

Strategic sites are to be exempt from design constraints resulting in the type of development such as that proposed on Three Farms Meadows. The inclusion of land to the south of this site does not mitigate the density obis sue and much of the land is constrained by the VOR requirements.

Land to the south abuts the Ockham Conservation area and increases the visibility of the site to and from the Surrey Hill AONB.

Attached documents:

Comment: MM40 - LPMM18/5388  Respondent: Judith Allen 8880353  Agent:
MM47 the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds, no justification for altering the boundary of the SNCI.

Biodiversity will be destroyed.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed - a breach of case law.

As a resident I believe that I have a right to be notified of the Local Plan, I have not received any such notification.

I therefore request that this Plan be scrapped as unsound for the reasons stated.

Attached documents:

Comment: MM41 - LPMM18/5387  Respondent: Judith Allen 8880353   Agent:

MM41 The transport strategy relies on inadequate modelling including including the delay to J10 of the M25 of at least two years and will have an impact on all development which relies on schemes such as Garlick's Arch. There is too much reliance on the A3 improvement scheme, the timescale of which GBC has no control.

Attached documents:

Comment: MM9 - LPMM18/5384  Respondent: Judith Allen 8880353   Agent:

MM9. Damaging infill in and around the villages will weaken the protection of the countryside.

Attached documents:

Comment: MM41 - LPMM18/2123  Respondent: John Telfer 8880385   Agent:

Further to my previous objections to planning proposals this letter is to object to the latest modifications of the Local Plan etc.

MM41 Land at Garlick's Arch, Send Marsh, Policy A43

The proposed increase from 400 to 550 houses comment be justified and is excessive because it contradicts the latest Office of National Statistics that it has overestimated demand for housing by 25%

Previous objections have been totally ignored and is contradicting to Green Belt Policy (MM9).

[unreadable text] destruction of established woodland contradicts government policy to retain and increase woodlands and to provide a breathing space between Send and Ripley.

The high tension electricity transmission lines will require a maintainence corridor which cuts light through any proposed development [unreadable text] at the developers expense.
Comment: MM42 - LPMM18/2124  Respondent: John Telfer 8880385  Agent:

MM42 Land at Burnt Common, London Road A58

This proposal was deleted from 2014 plan but it is by far the largest industrial scheme in any village in the borough and it is totally unnecessary because it contradicts MM9 further there is space capacity at Slyfield Business Centre, therefore the proven demand exists and contradicts the findings of the Employment Land Needs Assessment. The Local roads are clearly inadequate for heavy articulated lorries where as the roads at Slyfield are already in place.

Comment: MM44 - LPMM18/2125  Respondent: John Telfer 8880385  Agent:

MM44 Land at Aldertons Farm, Send Marsh Road A63

This proposal was previously rejected (GU/R/13751) it is presumed that rejection means what it says as there are no exceptional circumstances it contradicts MM9 Green Belt Policy. The additional development will place further pressure on the existing infrastructure.

In conclusion when all the proposals are totalled there will be so much additional pressure on existing infrastructure which is already inadequate.

The county has already the highest density of vehicles in the country and local roads have not been upgraded since the 1920's, the A3 [unreadable text] and slip roads cannot cope with existing pressures, e.g. congestion at the A3/A31 junctions and the effect of traffic lights failure at Stoke Road roundabout. The infrastructure also includes schools, and medical facilities etc. Apparently brownfield sites have not been considered as a priority.

Comment: MM45 - LPMM18/1773  Respondent: W.P. Garson 8880833  Agent:

I am writing to express my objection to the above.

This development would be an encroachment into the green belt. There are no exceptional circumstances to justify this. Apart from this fact there are a number of factors which make it inappropriate.

The infrastructure is not in place to support it. It would significantly increase the population of the village. Between 20 and 30 new dwellings have already been built in Glaziers Lane in recent years.

An additional 105 new houses would further increase the load on the infrastructure.
Traffic is already heavy in Glaziers Lane and much of it consists of heavy lorries. The small bridge over the railway is already showing signs of damage, which at some stage will have to be made good.

The site A64 is occupied in part by a small lake. Drainage has always been a problem in Normandy.

A lot of water runs off the north slope of the Hogs Back and at times overflow water infiltrates the gas supply in Glaziers Lane. Insurance of any houses built on this site might be difficult.

The local school at Wyke would have difficulty accommodating a large influx of new pupils.

The doctors’ surgery in Glaziers Lane would also be challenged, at a time when GP’s are already struggling to provide a good service.

More serious consideration should be given to the use of brown field sites. eg. the large area now occupied by Waitrose in Guildford, for which there was no need. The land used for this development including a car park could have provided many more homes.

Overall I believe this an ill conceived plan and not enough consideration has been given to the possible consequences were it to come to fruition.

Attached documents:

Comment: MM2 - LPMM18/5178  Respondent: Pamela French  8883841  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited

3. There is too much reliance on A3 improvements and these are beyond the council’s control

4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit

5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:

2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247.
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes.
**Comment:** MM3 - LPMM18/5199  **Respondent:** Pamela French 8883841  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

   MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

   MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

   MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

   In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

**Attached documents:**

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**Comment:** MM23 - LPMM18/5213  **Respondent:** Pamela French 8883841  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of **“green approaches”** should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**
Comment: MM31 - LPMM18/5214  Respondent: Pamela French 8883841  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Comment: MM32 - LPMM18/5218  Respondent: Pamela French 8883841  Agent:

MM32 A height limit for White Lion Walk is required.

Comment: MM33 - LPMM18/5222  Respondent: Pamela French 8883841  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Comment: MM35 - LPMM18/5223  Respondent: Pamela French 8883841  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.
Comment: MM41 - LPMM18/5224  Respondent: Pamela French 8883841  Agent:

MM41 Garlick's Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/5226  Respondent: Pamela French 8883841  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/5195  Respondent: Pamela French 8883841  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM45 - LPMM18/2544  Respondent: Ms Sarah Irving 8883905  Agent:

I am writing this email to object to the main modification MM45 to the Policy A64 (Land between Glaziers Lane and Strawberry Farm, Flexford). The modification states that this land is now “allocated for approximately 105 homes (C3), including some self-build and custom house building plots”. Before I state my reasons for my objection, I will include some background information as I understand it.

In their Draft Local Plan, GBC calculated that 672 extra homes should be built each year, but new lower population and household figures, just published by the Office for National Statistics, mean that GBC’s calculations have greatly overestimated how many students stay and procreate after finishing university. A revised figure of 360 homes a year is a much more realistic one and obviates the need to find extra sites to build in. Specifically, a lower housing figure means that building on the Green Belt, as proposed in The Plan, CANNOT be justified.

MM45 picks Site A64 as a site for development as one of five locations in the Green Belt. Site A64 is in the village where I live and I do not consider it suitable for a housing development for the following reasons:

In previous planning applications for this site, refusals have highlighted the enormous damage that would be done to the openness of the Green Belt should development be allowed. Development here would also close the gap between the two settlements of Flexford and Normandy, starting the urbanisation of what is now a VILLAGE community. It should stay as a village community and not be bludgeoned into a housing sprawl in what is meant to be protected Green Belt.

In the Sustainability Assessment linked to the proposal to develop Site A64 it states that, “There are no existing facilities in Flexford and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality in this way.” In addition, GBC has not indicated that improvements to
infrastructure have been earmarked to accompany any development so the already stretched sewage and road systems around Site A64 would be completely overloaded.

The Development of 105 homes under MM45 would see a 7% increase in the number of houses in Normandy and Flexford on a site that has not featured in any of the previous versions of The Plan and which has therefore NOT been subject to public consultation.

“Exceptional circumstances” are needed to remove an area of land from the Green Belt. I would argue that GBC CANNOT argue exceptional circumstances to use Green Belt land in Normandy to build on, especially as their figures for housing need now appear to be greatly inflated.

GBC should now ask the inspector to relook at The Plan in the light of the revised housing figures and make new suggestions that relate to these lower figures. In terms of housing need, GBC should fulfil its obligations by building on brownfield sites within the town centre or on other available sites in the Borough which are not Green Belt sites. GBC should NOT build on Green Belt land when it is not necessary.

Attached documents:

Comment: MM45 - LPMM18/2320  Respondent:  Ken Marchant 8884225  Agent:

The proposal for Normandy within the latest GBC plan

MM45 dealing with policy A64 proposal FLEXFORD settlement of 105 houses.

After many years all the previous GBC proposals for very good reasons have been refused after [unreadable text] legal appeals paid by the local [unreadable text]. This is yet another which I wish to lodge an objection for the following reasons:

1) No mention in the GBC submission of why the exceptional circumstances are for justifying using a part of the GREEN BELT surrounding the village.

2) The water table is very high and the area is liable to serious flooding.

3) The medical centre is already stretched eg it has taken my wife 5 weeks to get a doctors appointment.

4) The increased traffic will add to the very congested roads through the village.

5) The rail station is only a local line and the local bus route would be over 3/4 of a mile walk. There are no shops or post office and so all local purchases would involve use of a car except for those that do not have one.

6) The current sewage system is already overloaded and would require excessive restructuring work to be done.

7) The village school would likely need some expansion and car parking facilities.

8) The village is adjacent to the Surrey Hills an area of Outstanding Natural Beauty and would be adversely affected by building on the proposal Green Belt site, also the impact on the area from the Hogs Back would be affected.

Lastly I am a long time resident and rate payer living in the village and am concerned of the adverse effect the proposed intention would have of life in the village.

Attached documents:
Please note the following key issues concerning the proposed plan A64 in Glaziers Lane Normandy

There are no new infrastructure plans included in the proposal. The impact of 105 new homes would put impossible pressure on the village school which is already full to capacity and the local doctors’ surgery would have great difficulty coping with the needs of potentially 200-400 new patients.

The sewage system in Normandy is already overstretched and is prone to considerable flooding.

The road systems around Normandy and Flexford are not suitable for heavy traffic. The narrow bridge in Glaziers Lane was not built to carry heavy traffic and the narrow bridge in Westwood lane has the potential to be a bottle neck as well as being dangerous from motorists disregarding speed limits and right of way at the bridge as well as those turning out of Beech Lane.

The junctions at Wyke church and Glaziers Lane on to the Aldershot road experience traffic jams (increasing pollution in the village from idling engines) and the Glaziers Lane junction is an accident black spot. The junction at Flexford road and Westwood Lane is also a well known black spot for traffic accidents.

Previous applications on this site have been refused because of the damage it would do to The Green Belt. Why is it being reconsidered for an even larger development.

In short this site would place long term and unsustainable pressure on the local community with no benefit

Please forward to the relevant members of your team concerned with this issue.

Attached documents:

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I write to state that I firmly approve of this modification as the now designated settlement village bondary will protect the rural nature and character along with the unspoilt nature of the landscape which is valued by the residents in the village along with visitors. It is wonderful news that the previous proposed boundary will not become a reality and therefore the greenbelt land will be preserved.

Attached documents:

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The new build schedule for the 3 schemes which are either in or are close to West Horsley delivers over 2250 new homes spread over a 15 year period from 2020. This starts with the areas to the north and west of West Horsley from 2020 to 2024 and then ramps up from 2023 to 2034 at the old airfield, Wisley site with 150-200 homes per year. This presents a massive, prolonged period of change which coupled with the work at the A3/M25 intersection will mean that West Horsley will lose its characteristic village status and become just another part of the sprawling conurbation inside the M25.

Attached documents:
I write to state my firm approval of this modification as the now designated settlement village boundary will protect the rural nature and character along with the unspoiled nature of the landscape which is valued by the residents in the village along with visitors. It is wonderful news that the previous proposed boundary will not become a reality and therefore the greenbelt land will be preserved. Objections to this amendment will only provide excuses for the creeping urbanisation and development of greenbelt land and this must be resisted for the benefit of all those living in and around the Horsleys both now and in years to come.

Attached documents:

I strongly object to having to accept Woking Borough councils housing need. Item MM2 paragraph (1) and (2).

Attached documents:

I also feel that the housing requirement numbers do not meet the required amount. Basically I think we are being asked to build too many. Where is the increased population? I think the 600+ per year is too high.

Attached documents:

My comments would be that I strongly object to the Green belt being built on and being encroached on or infilling out of the settlement boundary especially in the areas of Jacobs well, Fairlands, Woodstreet village and Worpleston item MM9.

Attached documents:

Dear Sir / Madam

I have just been informed that there have been changes to the local plan and unlike the past we have not been updated, I have not been advised of any new consultation although have been in the past!! If you have removed me from your list then this goes against GDPR regulations, as I understand that we can continue to stay on data bases so long as we are given the option to 'opt out' and not forced to 'opt in'!
I would suggest that something with such importance to the local community should be examined in public as it has in the past and that the latest statistics from the Office of National Statistic can be used and hopefully relied on?

Attached documents:

Comment: MM45 - LPMM18/443  
Respondent: Gill Woolfson 8893697  
Agent:

OBJECTION TO A64

A64 is a recent addition to the New Local Plan, Having had the chance to look at it, I have the following Objections.

The proposed site is on Green Belt, Green Belt which has been assessed by Guildford Borough Council (GBC) itself as some of the most sensitive in the Borough. The NPPF states that exceptional circumstances must be shown for development in the Green Belt. Unmet housing is not sufficient reason for such development. GBC have not shown any exceptional circumstances in the case of A64. Previous applications here have been turned down on account of the harmful impact development would have on the Green Belt.

The Local Plan has little residential development in Guildford itself. I query why GBC has such a focus on new retail space, such as the North Street development, when bricks and mortar retail is struggling to deal with online competition. GBC might consider whether such sites would be more suited to housing. The requirement to find housing early on in the life of the plan provided an opportunity to look at this site again; GBC have again sought to put development in the Green Belt.

Recent ONS figures show that the anticipated housing need in Guildford has been overstated. As yet GBC have yet to factor this into the Local Plan. Looking at the impact of the new figures should be undertaken before more Green belt is sacrificed.

Such a large (for Flexford) development will change the character of the settlement. It will also start to close the gap between Flexford and Normandy and it crosses the natural barrier of the railway line. There is nothing in this proposed development that will enhance the lives of Flexford residents, only disadvantages such as increased traffic with its associated harmful pollution and strain on an already problematic sewage system.

I have not been asked, but if I were, I would say that we need development in Normandy Parish. This development should be small scale (organic growth) and should be dwellings that people can afford to buy.

Attached documents:

Comment: MM2 - LPMM18/3103  
Respondent: Carol Wilson 8896161  
Agent:

I OBJECT to the following modifications of the GBC Local Plan:

NUMBER OF HOUSES (MM2)

- The number of houses has increased to 12,600 in the latest plan.
- However, the ONS latest figures show a reduction in the requirement by 4507, some 40% to 6,635. It is therefore essential that the Public Hearing should be reopened so that the latest and significantly lower figures can be used.
• A reduction of 4507 means that two to three of the large sites would no longer be required. Such as Wisley MM40, Gosden Hill MM35 and Garlick's arch MM41.

• The 655 dwellings on the five smaller sites, added to enable early building numbers could also be eliminated.

• There would be no exceptional circumstances for development on the greenbelt.

RE-OPENING THE PUBLIC EXAMINATION (MM2)

• The Public Examination of the Plan by the Planning Inspector must be re-opened as the figures have changed so much.

Attached documents:

Comment: MM3 - LPMM18/3104  Respondent: Carol Wilson 8896161  Agent:

NEW POLICY S3 ON THE TOWN CENTRE (MM3)(S3)

• The hierarchy of development has not been used, particularly in the town centre. There is ample brownfield there and this would be better used for 3,000 dwellings than for retail. The Internet has changed shopping habits and reduced some of the need for retail shops, so we have enough retail space yet not enough housing.

• The town centre is universally acknowledged (including by the Council) to be the largest and most sustainable location in the borough, then please get on and use it, instead of greenbelt land. Pollution, traffic jams and car use would be less if houses were in the centre instead of car only Greenfield sites.

• A town centre policy is necessary, but the current draft falls well short of the requirement.

• There is too much reliance on A3 changes and these are not under the control of the GBC and infrastructure is inadequate.

Attached documents:

Comment: MM40 - LPMM18/3106  Respondent: Carol Wilson 8896161  Agent:

POLICY A35: FORMER WISLEY AIRFIELD (MM40)

• GBC refused planning permission for this site, then the Inspector and Secretary of State refused it too. Yet it is still there again in the plan. What a nonsense and waste of time and money.

• With the ONS reduced numbers this site will not be needed.

• Similar reductions will apply for Woking and so their ‘unmet need’ will no longer exist to be foisted upon Guildford.

• The Site of Nature Conservation Importance is not being treated as it deserves and as it was promised to be treated by avoidance and mitigation measures. There is no justification for altering the boundaries.

• Land to the south has been added to the site. Building here would do additional damage to the Conservation area.

Attached documents:
4. **POLICY P2: GREEN BELT (MM9)**

- The large reduction in projected households has not been allowed for.
- **66% of proposed housing is planned to be built on land that currently lies within the Green Belt.**
- The sustainable town centre land is not being used to its optimum for housing.
- Therefore the 66% of new housing proposed for the Greenbelt should not be needed, as the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist.

**Attached documents:**

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**Comment: MM2 - LPMM18/465**  **Respondent:** Mrs K I Mackay 8896641  **Agent:**

Our response to the proposals is that we submitted our response in the original plan Guildford, Merrow, Burpham, Send, Ripley, West Clandon, West Horsley, Wisley Airfield. There is no infrastructure to support any of these proposed developments on Green Belt Land. There is no justification for taking land out of the Green Belt in order that it can be built on when there are many brownfield sites that can be used. We do not have the time to go through page after page of these proposed alterations to the plan.

The traffic through all of these areas is already more than can be coped with and we have not seen any proposals that would prevent this being an overflow from London. Which is exactly what the developers at Wisley told us when we went to view their first proposal for development. The people in the villages have a right to quality of life, free from pollution and noise generated by traffic.

The National Statistics Office have clearly stated that you have overestimated the housing requirement for this area and they do not expect it to change. They have slashed their forecasts for population growth in the borough by 40%. September 20th 2018, that the figure would be 4,662. This means the housing requirements could be met on existing brownfield sites within the town.

There is no reason that is acceptable that Guildford and the surrounding villages should meet Woking's unmet housing needs when Woking has ignored their residents' needs.

We therefore hope that without spending a great deal of taxpayers' money this housing assessment will be reviewed and that priority will be given to the quality of life for residents and wildlife conservation.

Having seen the photographs A247 West Clandon New Local Plan

Please add these to our correspondence below taken a month ago at the other end of the village by Lime Grove.
Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2.Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

Attached documents:

Comment: MM2 - LPMM18/1827  Respondent: Mrs K I Mackay 8896641   Agent:

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/1830  Respondent: Mrs K I Mackay 8896641   Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.
MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

**Comment:** MM23 - LPMM18/1838  **Respondent:** Mrs K I Mackay 8896641  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

**Comment:** MM3 - LPMM18/1828  **Respondent:** Mrs K I Mackay 8896641  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

**Comment:** MM3 - LPMM18/1837  **Respondent:** Mrs K I Mackay 8896641  **Agent:**

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

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510 of 2554
The town centre policy, S3, is inadequate and also does not address the infrastructure deficit.

Comment: MM31 - LPMM18/1831  Respondent:  Mrs K I Mackay 8896641  Agent:  

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Comment: MM32 - LPMM18/1832  Respondent:  Mrs K I Mackay 8896641  Agent:  

MM32 A height limit for White Lion Walk is required.

Comment: MM33 - LPMM18/1833  Respondent:  Mrs K I Mackay 8896641  Agent:  

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Comment: MM35 - LPMM18/1834  Respondent:  Mrs K I Mackay 8896641  Agent:  

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.
Comment: MM41 - LPMM18/1835  Respondent: Mrs K I Mackay 8896641  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/1836  Respondent: Mrs K I Mackay 8896641  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM48 - LPMM18/1826  Respondent: Mrs K I Mackay 8896641  Agent:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.
The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
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9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**
The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

Attached documents:

**Comment:** MM48 - LPMM18/1988  **Respondent:** Mrs K I Mackay 8896641  **Agent:**

I would also like to add that if you look at the West Clandon Village Safety Scheme Feasibility Report 6 June 2007, you will find that the report outlines all the problems with the A247 and the conclusion was that although the route through the village is an A Class road it is below today’s standards in regard to width of carriageway. In places it is below the requirement. #

As an ex Health and Safety Consultant I have frequently requested that a pollution and noise survey in undertaken in the actual village itself. Properties are very close to the road and at times you can taste the fumes as you are walking to and from the Railway Station. The amount of vehicles using this route is already unsuitable and unacceptable to the residents as it affects our quality of life.

Attached documents:

**Comment:** MM9 - LPMM18/1829  **Respondent:** Mrs K I Mackay 8896641  **Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

**Comment:** MM27 - LPMM18/2393  **Respondent:** Marianne Pascoe 8896961  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more
cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock. There is too much reliance on A3 ( Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

**Comment: MM40 - LPMM18/2397  Respondent: Marianne Pascoe 8896961  Agent:**

**SITE SPECIFIC – A35 – Three Farms Meadows**

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
- MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

I you support the representation made by Wisley Action Group ( WAG) which was written with advice from Richard Harwood QC.

Further, I would like the examination in public to be reopened so that the latest Office of National Statistics figures can be used, which show a reduced need in housing.

Attached documents:

**Comment: MM41 - LPMM18/2389  Respondent: Marianne Pascoe 8896961  Agent:**

I am writing to OBJECT to the local plan Main Modifications as outlined below:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
- It is Green Belt containing ancient woodland
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:
MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM42 - LPMM18/2390  Respondent: Marianne Pascoe 8896961   Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Attached documents:

Comment: MM42 - LPMM18/2395  Respondent: Marianne Pascoe 8896961   Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM44 - LPMM18/2391  Respondent: Marianne Pascoe 8896961   Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
• It will detract from the heritage buildings at Send Marsh Green
• The additional traffic will increase pressure on the Send Crossroads
• With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/2396  Respondent: Marianne Pascoe 8896961  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

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Comment: MM9 - LPMM18/2392  Respondent: Marianne Pascoe 8896961  Agent:

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM2 - LPMM18/4108  Respondent: Caroline Gray 8896993  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

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Comment: MM23 - LPMM18/4112  Respondent: Caroline Gray 8896993  Agent:

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If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4119  Respondent: Caroline Gray 8896993  Agent:

– POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.
The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/4109  Respondent: Caroline Gray 8896993  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM31 - LPMM18/4113  Respondent: Caroline Gray 8896993  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4114  Respondent: Caroline Gray 8896993  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4115  Respondent: Caroline Gray 8896993  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor atSlyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:
Comment: MM35 - LPMM18/4116  Respondent: Caroline Gray 8896993  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/4117  Respondent: Caroline Gray 8896993  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/4118  Respondent: Caroline Gray 8896993  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/4110  Respondent: Caroline Gray 8896993  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM45 - LPMM18/679  Respondent: Christine Wilks 8898241  Agent:

I would like to comment on the above application for 105 proposed houses in my village.

I have lived in Normandy for 62 of my 71 years and think that yes we do need some new houses with new families here. Normandy has an ageing population which could do with an injection of youth. However the site in question isn't suitable.
1) The sewers in the area are already overloaded, causing problems with drains and exacerbating regular flooding. This is a long standing problem which doesn't appear to have been addressed.

2) The extra traffic will make Glaziers Lane, a D road, a very busy road especially at peak times. When there are traffic problems on the A31 Hogs Back everyone cuts through Normandy down Glaziers Lane to get to work in town via the A323 and considerable queues build up. I see them from my house. We don't need any more traffic from this new development.

3) If this development goes ahead whoever exits from it is putting themselves directly in danger into the path of vehicles coming over the hump back bridge just yards away.

4) The said bridge is already degrading due to an increasing amount of traffic. I have noticed the road surface at the top has a more pronounced ridge and dip in it recently which is becoming a danger to vehicles which now 'bounce' over it. I know this isn't your problem but it is a factor to consider that without work being done the bridge could collapse one day.

5) There does not appear to be any upgrading of local infrastructure to cope with this development. See point 1.

6) We have no shops (unless you want karaoke equipment or a motorbike!), no pubs, no post office, no petrol station and if you need anything you have to get in your car and drive elsewhere. So more strain on the roads, more air pollution, more noise from these additional families going about their daily lives.

7) Previous planning applications for this site have been refused because of the damage to the Green Belt so shouldn't this still apply or is local government now being forced to renege on past promises by central government - who previously said that the Green Belt should be preserved.

When you hold these so-called public consultations do local people's views count for anything at all ? I sometimes wonder, as write yet another letter, whether anyone will take any notice of it. What we really need in Normandy ( as I have stated many times before) is a residential development for the elderly. Us 'oldies' could then downsize and free up our family homes with their big gardens for people who need them more than us. Any developer would have no difficulty selling these retirement homes because we have the equity to afford them and many of my neighbours agree with the idea. There would be a long waiting list. If any developer presents you with a plan like that please approve it straight away !

Attached documents:
The housing requirement should be calculated from the starting point of the latest, September 2018, ONS projections rather than the projections released earlier in 2018. These reduce the net increase in households on those projections from 420 per annum to 325 per annum.

The housing requirement figures should therefore be adjusted downwards.

This reduces the case for Green Belt releases and there are not the exceptional circumstances which are necessary to support all of the sites. Fewer Green Belt sites ought therefore to be released, with the unsustainable site of Former Wisley Airfield/Three Farm Meadows (FWA/TFM) the first to go.

We note that the Inspector has sought the Council’s views on those ONS figures (ID/10), but given their significance ought to be asking the examination participants more generally for their views.

MM2 – 4.1.11

The revised housing trajectory projects the first homes coming from FWA/TFM in 2022/23. However, the M25 Junction 10 works are said to need to be completed before any units can be occupied at the site. Given the delays to the Junction 10 project, the trajectory is unrealistically optimistic. The start date for commencement of works on J10/M25 roundabout has been pushed back to begin late 2021 with a completion date to be confirmed!

Site A35 FWA/TFM is highly unlikely to make any contribution to the five year supply.

Attached documents:

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Comment: MM23 - LPMM18/3400  Respondent: Mrs Mary-Claire Travers 8898401  Agent:

MM23 D1

Removal of sustainability expectations

The important expectations on developments of 25 dwellings or more in D1(2) are removed without any justification. The submitted text provided a series of requirements which met the social dimension of sustainable development in national policy. As submitted, the text is sound and so cannot be changed at this stage.

The replacement text is less precise, for example, on community interaction, walking distances, active lifestyles, routes to nearby areas for pedestrians and cyclists.

MM23 D1 para13- 15

Masterplan for Former Wisley Airfield (FWA/TFM)

The masterplans proposed suffer from two main defects:

(i) They are produced by and approved by the developer. They do not have the status of supplementary planning documents or other local development documents and are not approved by the local planning authority. If the Council does not agree with them, it can do nothing. Notwithstanding that, para 17 requires planning applications to be consistent with the masterplans, so in those respects is determining the acceptability of the developer’s own application on its compliance with the developer’s own masterplan. That is allowing the developer to mark his own homework.

Developers can get master planning very badly wrong, as the FWA/TFM appeal decision demonstrated.
The masterplans are required to respond to very vague criteria in para 16. Those are much less precise and useful than the expectations in the submitted D1(2). Almost any scheme could, in a developer’s eyes, meet para 16, even if it was a failure.

**37 D4**

Deletion

**The submitted policy D4 is sound** and there is no rational basis upon which it could be unsound. No amendment is therefore justified.

Whilst some elements are incorporated into the main modifications for D1, other details such as (1)(d) ‘e street patterns, spaces around buildings, layout, grain, scale, massing, proportions, height and materials of surrounding buildings’ are omitted from the proposed text.

**Attached documents:**

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**Comment:** MM40 - LPMM18/3401  **Respondent:** Mrs Mary-Claire Travers 8898401  **Agent:**

**Site Specific A35 FWA/TFM**

53 MM40

Quality requirements for FWA

Apart from the wastewater requirements, **the changes lack any rationale or benefit**. The condition of the SNCI will be inevitably compromised by the development itself. Moving references to unique places and unique context from opportunities to requirements is no doubt intended to strengthen the expectations but involves turning a very vague expectation into a similarly vague requirement.

**Attached documents:**

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**Comment:** MM50 - LPMM18/3402  **Respondent:** Mrs Mary-Claire Travers 8898401  **Agent:**

60 MM47

Map Amending SNCI Former Wisley Airfield/Three Farm Meadows (FWA/TFM)

The amendment drastically reduces the size of the site of nature conservation importance at the FWA/TFM. However, the ecological interest of the land still merits SNCI designation. The published SNCI designation is sound and there is no justification for changing it.

The change appears to be to facilitate the new settlement. However, **SNCI designation depends upon the merits of the land rather than desires to develop it**. Policy ID4(6) sets out **the test to be applied to weigh any benefits of a scheme against the harm to a SNCI. It is not there to be bypassed by the removal of SNCI designations because land is allocated for development or SANG.**
• The addition of land to the south of FWA/TFM does not mitigate the density issue with the site as much of the new land is constrained by the VOR which prevents construction within a certain radius. There is currently no set date by the CAA for this aviation beacon to move.

• Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB

• An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

Removal of the site known as A35 would deal with a number of these issues.

I trust you take into considerations the issues highlighted in my letter as the soundness of your Local Plan depend on you satisfactorily addressing these issues.

Attached documents:

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**Comment:** MM9 - LPMM18/3399  **Respondent:** Mrs Mary-Claire Travers 8898401  **Agent:**

**MM9**

The modification is a weakening of the protection of the countryside, changing the site being ‘as a matter of fact within the village’ to ‘should be considered to be’. The new text has a prospective element to it – how the village ought in the future to be perceived rather than how it presently is.

In the context of a very diffused settlement such as Ockham, it is difficult to identify what is within the village at present, let alone what should be considered to be. The proposed modification would bring an uncertain, but potentially large, area into possible ‘infill’ development.

The Sustainability Appraisal Report Addendum asserts that there is ‘a considerable re-write of the policy; however, this is presentational, i.e. there is no change in policy approach’ (para 9.11.3). Firstly, there is a change in the policy and either way the current text is not unsound. A presentational re-write cannot be addressing a failure of a plan to be sound.

Attached documents:

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**Comment:** MM41 - LPMM18/151  **Respondent:** Retired (Mr Michael Jordan) 8899169  **Agent:**

Ref.MM41, 42,44,

I object to The Local Plan in particular to the proposed developments in and around Send which are being placed on green belt land.

The Government has said that green belt lands can only be used in extreme circumstances. This proposal does not fall into that category.

Send is a village with beautiful green fields and to suggest almost doubling the number dwellings will be the death of what we have. Previously I have written several times with my objections as has thousands of others and these objections continue to be ignored. Reiterating the objections.

1. We have old woodlands which are home to animals and birds including protected bats. Extensive development as proposed will join up other local villages and become over development. Garlick's arch is subject to flooding
and by concreting over will make other areas more susceptible. Local infrastructure already poor will be
drowned by at least another 1000 cars and local medical centre Will not cope. Schools also are not available for
more children.

2. Land at Burntcommon is proposed to be increased by 100 per cent, previously this was deleted from the 2014 plan and
now increased twice. There is no need to industrialise our village further when a Slyfield Trading estate has unused
capacity contradicting MM9. Send narrow roads will be affected even more with heavy goods vehicles and air
contamination.

3. Land at Aldertons site again green belt land with no special circumstances (policy MM9). The number of new homes
projects is unreasonable which will put increased pressure on traffic lights at Send crossroads already choked during
periods of the day. Our villag life is being destroyed. All this additional housing nearing the double we have is far
excessive for our current infrastructure.

4. The proposed developments in Send do not take into account the traffic implications are not adequately addressed by
the A3 changes and Clandon slip roads. Send Barns lane where I live will be swamped by thousands of more lorries and
cars heading towards Woking.

5. This consultation only includes the proposed developments listed and does not allow for comments on the additional
40 houses and traveller sites on Send Hill and 60 houses at Clockburn in tannery lane. The 25 per cent increase to the
send business centre despite the Wey conservation area.

Finally we do not need this massive increase to local house building which is unaffordable to most younger people,
various new build developments already remain only half sold. New affordable housing needs to built in Guildford and
brown field sets.

yours faithfully

mr m. Jordan

Send resident in [Response has been redacted due to statement containing personal data which cannot be disclosed due to
the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

Attached documents:

Comment: MM2 - LPMM18/2920 Respondent: Tessa Crago 8899713 Agent:

Guildford Borough Council’s Modified Local Plan consultation

Thank you for keeping me informed of the progress of the Local Plan and I would like you to note my following
comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision
Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities,
especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:
1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 – potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000-place school on the site behind the station.
4. The exit lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure e.g. excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.
MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2923  Respondent: Tessa Crago  8899713  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/2931  Respondent: Tessa Crago  8899713  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/2921  Respondent: Tessa Crago  8899713  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing
and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attended documents:

**Comment:** MM3 - LPMM18/2930  **Respondent:** Tessa Crago 8899713  **Agent:**

F. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attended documents:

**Comment:** MM31 - LPMM18/2924  **Respondent:** Tessa Crago 8899713  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attended documents:

**Comment:** MM32 - LPMM18/2925  **Respondent:** Tessa Crago 8899713  **Agent:**

MM32 A height limit for White Lion Walk is required.

Attended documents:

**Comment:** MM33 - LPMM18/2926  **Respondent:** Tessa Crago 8899713  **Agent:**
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

**Comment:** MM35 - LPMM18/2927  **Respondent:** Tessa Crago 8899713  **Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

**Comment:** MM41 - LPMM18/2928  **Respondent:** Tessa Crago 8899713  **Agent:**

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

**Comment:** MM44 - LPMM18/2929  **Respondent:** Tessa Crago 8899713  **Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

**Comment:** MM9 - LPMM18/2922  **Respondent:** Tessa Crago 8899713  **Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Objection to the addition of site A64 (Flexford) in MM45

We are of the strong opinion that site A64 in MM45 should be removed from the local plan for the following reasons:

1. Neil MacDonald has demonstrated that building 360 homes per year would adequately support the very ambitious growth rate for Guildford proposed by the Planning Inspector. The figure of 630 new homes per year on which the local plan is based is massively out of step with the new Office of National Statistics figures.

2. We firmly believe 360 homes per year could be accommodated in Guildford town centre (as requested by the Planning Inspector) or on brown-field sites, thereby protecting our beautiful green, open spaces for future generations.

3. Site A64 is located within the Green Belt and no exceptional circumstances to remove it’s Green Belt designation have been provided.

4. The addition of site A64 is simply a knee-jerk reaction to the Planning Inspector’s request to build more houses earlier in the planning period. Over the years that the Local Plan has been under consultation, this site has never even been considered, let alone proposed. Further, all previous planning applications for this site (nothing to do with the Local Plan) have been refused, underlining the sensitivity of the site and the damage that would be inflicted on the Green Belt.

5. Building 104 new homes on such a small site will not be in keeping with the rest of the village, almost all of the houses along Glaziers Lane are family homes with extensive gardens. To achieve 104 homes on the proposed site would require very dense housing and involve multistorey flats, realistically this site could not accommodate more than 20 new homes if it is to remain in keeping with the rest of the village.

6. The villages of Flexford and Normandy lie in a shallow basin that is very prone to flooding, site A64 is currently a field that acts as drainage during periods of heavy rain, how do you propose to accommodate the water run-off once the field has been concreted over?

7. This site is close to Surrey Hills AONB, as such, building on this land will have a detrimental impact on local wildlife.

8. Site A64 is located on Glaziers Lane, a small D road, not really suited to cope with an additional 400+ car journeys per day.

9. The entrance to the site will be just north of the bridge over the railway line, with a notoriously blind summit that silly idiots speed over, having an additional 400+ cars exiting and entering the proposed site each day will inevitably lead to collisions. In addition, the railway bridge is currently in need of major repair work.

10. The sustainability assessment indicates site A64 is a very poor choice: Flexford currently has no facilities other than the train station, and the facilities of nearby Normandy village (GP surgery and primary school) are already over-subscribed. No improvements to the local infrastructure have been included in the plan to accommodate the proposed 2-400 new residents.

Attached documents:

2. Given the very large discrepancies between the Plan and the up-to-date ONS household data the Public Examination of the Plan by the Planning Inspector must be re-opened.

Attached documents:
1. MM40 and MM35

On the 20th September the ONS released new household growth projections for Guildford for the Plan period. The new figures reduced the projected growth in households from 11,142 (applied to the previous version of the Plan) to 6,635, a reduction of 4,507 households, a 40.5% reduction. This change should have come as no surprise as in May 2018 ONS had already released their population projections that clearly foreshadowed a substantial drop in household projection. A reduction of 4,507 households equates to well over 2 strategic sites, for example MM40 and MM35.

Attached documents:

4. Policy A35 Former Wisley Airfield MM40

On 13th June 2018 the Secretary of State upheld the Councils decision to refuse permission for the Wisley Airfield planning application (15/P/00012) and the applicants planning appeal was dismissed. Three months later the Local Plan (including Policy A35 for development of essentially the same scale on Wisley Airfield was submitted for the present public consultation. This seems very strange when the official household projections on which the Local Plan was based had been reduced by 40%.

The SNCI which used to cover the entire site has been reduced to about 15-20% of its former size. This contradicts the Local Plan which states that "Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures".

Consequently, Wisley Airfield should be withdrawn from the Local Plan.

Attached documents:

5. Policy A35 Former Wisley Airfield MM40

On 13th June 2018 the Secretary of State upheld the Councils decision to refuse permission for the Wisley Airfield planning application (15/P/00012) and the applicants planning appeal was dismissed. Three months later the Local Plan (including Policy A35 for development of essentially the same scale on Wisley Airfield was submitted for the present public consultation. This seems very strange when the official household projections on which the Local Plan was based had been reduced by 40%.

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Consequently, Wisley Airfield should be withdrawn from the Local Plan.

Attached documents:
3. **Policy P2: Green Belt MM9**

This policy has been almost completely redrafted but takes no account of the large reduction in projected households. 66% of the Plan's proposed housing is planned to be built on land that currently lies within the Green Belt. The exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist.

**Attached documents:**

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**Comment:** MM2 - LPMM18/3714  **Respondent:** John Burgess 8900481  **Agent:**

Please find below my response to the latest DLPM.

I OBJECT to the DLPM because:

1. Guildford Borough Council’s (“GBC”) proposals are flawed. The latest population and household figures produced by the Office for National Statistics, show a significant reduction in housing requirements for the borough compared to figures used by GBC, rendering the current draft local plan untenable.

The revised figures mean development in the Green Belt on the scale proposed cannot be justified. Insetting of villages and designated sites for housing should be re-examined and reflect revised housing need projections.

**Attached documents:**

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**Comment:** MM3 - LPMM18/3717  **Respondent:** John Burgess 8900481  **Agent:**

4. the draft local plan’s emphasis on retail provision is, I believe, out of date in that current trends suggest a continuing increase in online shopping, witness the current concerns, generally, for the UK’s decline in high street shopping. The current allocation proposed for retail should be reviewed and any savings should, if feasible, be allocated to housing, thus providing an element of relief to pressures to utilise the Green Belt.

**Attached documents:**

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**Comment:** MM40 - LPMM18/3715  **Respondent:** John Burgess 8900481  **Agent:**

2. the proposal to develop the former Wisley airfield should be withdrawn from sites proposed for housing development, given the outcome of the recent appeal process and the comments of the Government’s inspector and Secretary of State justifying the appeal’s rejection. Any development, particularly on the scale proposed, will have a devastating impact, inter alia, on the locality and its infrastructure.

**Attached documents:**
5. whilst I have no objection per se to housing development, such development should be proportionate. I believe that the proposed housing allocation in my area (the Horsleys) is excessive and, if combined with the Wisley Airfield proposals and other proposed housing sites further afield but still nearby (e.g. Ripley/Send) will have a severe, adverse impact on the area’s general infrastructure: roads, local railway stations, medical provision, car dependency, etc.

Regrettably, time constraints prevent me from commenting further and in more detail.

Attached documents:

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3. there should be no requirement for GBC to take Woking’s perceived unmet housing need. This can only impact further on the plight of Guildford’s Green Belt.

Attached documents:

---

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
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6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
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12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.
Comment: MM23 - LPMM18/3944  Respondent: Susan Fuller 8900705  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Comment: MM23 - LPMM18/3953  Respondent: Susan Fuller 8900705  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Comment: MM3 - LPMM18/3941  Respondent: Susan Fuller 8900705  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share
MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/3945  Respondent: Susan Fuller 8900705  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/3946  Respondent: Susan Fuller 8900705  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/3948  Respondent: Susan Fuller 8900705  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/3949  Respondent: Susan Fuller 8900705  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.
MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/3950  Respondent: Susan Fuller 8900705  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/3951  Respondent: Susan Fuller 8900705  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/3942  Respondent: Susan Fuller 8900705  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/5916  Respondent: Andrew Frackiewicz 8900769  Agent:

**Guildford Borough Council (GBC) Proposed Local Plan - Comments On Proposed Modifications**

I wish to place on record that the comments (applicable) relating to the previous versions of the Guildford Local Plan (Plan) which I made in my previous emails dated 17 July 2016 and 23 July 2017 continue to apply.

Dealing with the modified plan I wish to make the following comments as in my opinion the Plan is unsound and based on out of date data:

Number of Houses (MM2): The current version of the Plan should be based on the latest prediction of household growth projections from the Office of National Statistics, such projections now being some 50% lower than the current plan for...
some 12,500 houses. I continue to believe that the housing targets for Guildford Borough are excessive and over-stated particularly given the developing political situation including pending withdrawal from the EC.

...

Finally I believe that the Plan is unsound as it does not consider the latest population statistics and trends, relies on utilising green belt land, does not fully utilise brown field development which would have the benefit of regenerating our ailing town centres and increasing the inflow of Council Tax revenue. I also consider that the many submissions and representations of East Horsley Parish Council together with other adjoining parish councils such as West Horsley, Ockham, etc. as well as the submissions and representations of Wisley Action Group have not been properly considered and/or ignored.

As such I consider that the Plan must be amended and thereafter the Public Examination (MM2) of the Plan re-opened.

Attached documents:

Comment: MM40 - LPMM18/5917  Respondent: Andrew Frackiewicz 8900769  Agent:

Regarding the proposed modification to the Plan I fully agree and endorse the comments and points of objection expressed in the two letters from East Horsley Parish Council dated 10 October 2018 dealing with (i) various comments on the proposed modification (ii) Policy A35 - Land at former Wisley Airfield, Ockham, and also those from Wisley Action Group.

...

Policy A35 - Land at Wisley Airfield (Three Farm Meadows): The continued retention of this land in the Local Plan for an enormous settlement remains totally unacceptable and is ill-founded and against the views of the vast majority of the population currently residing in East & West Horsley, Ockham, Ripley, etc. The continued inclusion of this site is in my opinion a complete disregard by Guildford Borough Council officials to the fact that development on this site was rejected by the Secretary of State following a Public inquiry. This site should be removed from the Plan.

Attached documents:

Comment: MM9 - LPMM18/5918  Respondent: Andrew Frackiewicz 8900769  Agent:

Policy P2 - Green Belt (MM9): The proposed changes to the insetting of East Horsley and West Horsley as well as the movement of the settlement boundaries of the respective villages in unacceptable and against the policy of having a protected Green Belt.

Attached documents:

Comment: MM2 - LPMM18/4698  Respondent: Michael Baker 8901089  Agent:

Objections to proposed modifications to Guildford Borough Council Local Plan

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542 of 2554
I object to the proposed modifications to the Local Plan for a number of reasons, inter alia:

- The housing target is incorrect and the hearing on the examination must be re-opened to enable other key factors to be taken into account;
- There should be no requirement for Guildford to take Woking’s unmet need as this will require further greenbelt release.

Attached documents:

<table>
<thead>
<tr>
<th>Comment: MM3</th>
<th>LPMM18/4700</th>
<th>Respondent: Michael Baker 8901089</th>
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I trust that these objections will be fully considered and the public hearing re-opened.

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<th>Respondent: Michael Baker 8901089</th>
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<th>LPMM18/4703</th>
<th>Respondent: Annette Baker 8901185</th>
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Objections to proposed modifications to Guildford Borough Council Local Plan

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There is far too much allocation for retail in the town centre;

There is far too much reliance on A3 improvements that are beyond the council’s control and have no fixed timescale;

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In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

   **The A247**

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MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/4381  Respondent: Duncan Gray 8901633  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4390  Respondent: Duncan Gray 8901633  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.
The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/4379  Respondent: Duncan Gray 8901633  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/4382  Respondent: Duncan Gray 8901633  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4383  Respondent: Duncan Gray 8901633  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:
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<tr>
<th>Comment: MM33 - LPMM18/4385</th>
<th><strong>Respondent:</strong> Duncan Gray 8901633</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td>MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.</td>
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<th>Comment: MM35 - LPMM18/4386</th>
<th><strong>Respondent:</strong> Duncan Gray 8901633</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td>MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development. MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm. MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.</td>
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<th>Comment: MM41 - LPMM18/4387</th>
<th><strong>Respondent:</strong> Duncan Gray 8901633</th>
<th><strong>Agent:</strong></th>
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<tr>
<td>MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.</td>
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<th>Comment: MM44 - LPMM18/4388</th>
<th><strong>Respondent:</strong> Duncan Gray 8901633</th>
<th><strong>Agent:</strong></th>
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<tr>
<td>MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.</td>
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<th>Comment: MM9 - LPMM18/4380</th>
<th><strong>Respondent:</strong> Duncan Gray 8901633</th>
<th><strong>Agent:</strong></th>
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<tr>
<td>MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
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<td><strong>Attached documents:</strong></td>
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**Comment: MM45 - LPMM18/666  ** **Respondent:** Raymond Woolfson 8901825 ** Agent:**

**Re: New Local Plan - OBJECTION TO A64**

My objections to the plan for A64 are as follows:-

- The proposed site is on Green Belt land. This land has previously been assessed by GBC as the most sensitive Green Belt Land in the Guildford area.

- The NPPF states that exceptional circumstances must be shown for development in the Green Belt. Unmet housing is not a sufficient reason for establishing Exceptional Circumstances. Indeed previous applications in Normandy have been turned down because of the perceived harmful impact that development would have on the Green Belt.

- Such a development will create an increase in traffic on Glaziers Lane. This road is a category D road and is not suitable for an increase in traffic. In addition no provision for improved infrastructure is included in the GBC plan.

- No benefit to the local community has been demonstrated in the plan and local residents were not consulted about what they thought about the proposed development.

- The proposed development is within sight of the Area of Outstanding Beauty. It will damage the view and have an adverse effect on the beautiful Surrey Hills.

- Why, instead, is building in central Guildford not being proposed? This was even suggested by the Inspector of the plan.

**Attached documents:**

---

**Comment: MM41 - LPMM18/751  ** **Respondent:** I.G. Howell 8901953 ** Agent:**

Local Plan, Public Examination for Send & Send Marsh.

This is a letter I should never have to write. It is not about 'main modifications' to the plan but the plan itself, as now approved by the independent inspector. Guildford council submitted these plans in the knowledge that they were rejected by the majority of residents in this area and are ultimately responsible for the outcome.

Despite 7000 objections to MM41, land at Garlicks Arch was approved initially for 400 homes, now increased to 550, without addressing any of the far-reaching implications of doing so. By my calculation, this means that 15 members of your electorate objected to it for every single counsellor's approval. This is not democracy. This country fought 2 world wars for democracy and saved the lives of the very people who are now oblivious to it.

As pointed out in previous letters on this subject (totally ignored) the plan for Garlicks Arch and associated development, never considered the holistic detriment to the surrounding area that it will cause. It happens to be, in no small part, a valued area of Surrey, the lungs of London and in a county that people from all over the World travel here to visit for its peace and tranquility. It is not acceptable to turn it into a dumping ground for industrial proliferation, excessive housing and a disastrous transport anomaly. The idea of directing Woking-bound M25 traffic onto the A247 in Send is asinine. What happens to it once it reaches Old Woking, a medieval village?

So, while your planning department tinkers with the detail of this concept, using up tax-payers money destined for the care of the elderly, Rome burns. You have totally and flagrantly ignored the wishes of the people of this area so expect no quarter by return. Continued intransigence by Guildford Council to address the concerns expressed here will ultimately leave us no choice but to take direct action.
Comment: MM45 - LPMM18/3596  Respondent: Richard Jefferies 8902625  Agent:

I oppose the proposed development in Glaziers Lane.

1. This is a 7% increase in the size of Normandy without any accompanying improvements in Infrastructure.
2. The existing bridge is dangerous with poor sight lines. Increase in immediate traffic will only acerbate the problem.

Comment: MM2 - LPMM18/5803  Respondent: Lyndell Mussell 8902689  Agent:

I should like to make the following comments on the Draft Local Plan

I am a Guildfordian and I am very concerned as to the future development of Guildford. In particular, the Guildford Borough Council's persistence in calling for a high housing target in the Draft Local Plan. (MM2)

I would respectfully ask the Inspector to re-open the examination and amend the Plan to take into account of the new lower figures. (MM2)

The Guildford Resident Association's adviser has shown that Guildford can achieve ambitious economic growth with an extra 360 homes a year. This a more realistic figure than the 630+42 extra homes a year currently proposed in the Draft local Plan which would lead to excessive loss of countryside, congestion and town cramming. (MM2)

The new figure of 360 means development in the Green Belt on the scale proposed in the Local Plan can no longer be justified. Guildford could then maintain its unique position as an historic country town within the Green Belt. It is already under strain in terms of congestion, pollution and infra-structure, so the adoption of the higher housing target would make life unpleasant. (MM2) The character of Guildford would be irreparably damaged if it was to become part of an urban development towards London or elsewhere.

The current figure in the Draft Plan of 630+42 extra homes a year is 75% higher than the number of homes needed to support ambitious economic growth and out of step with both the new ONS figures and the new Government formula. This is based on two factors. Firstly, adding extra homes for students even though they are already catered for in the figures. Secondly, inflating the figures by being very pessimistic about how many and how much local people work, so lots of extra workers would have to be brought in. Guildford would be building twice as many homes than the population needs. (MM2)

In addition, the Inspector's suggestion that Guildford build an additional 42 homes a year in our Green Belt to protect Woking's Green Belt seems perverse when Woking has ambitious growth plans. Its housing need figure has also reduced and has not been assessed at Examination. MM2)
MM23 Promotion of "green approaches" should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

**Attached documents:**

**Comment:** MM3 - LPMM18/5806  **Respondent:** Lyndell Mussell 8902689  **Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing.

**Attached documents:**

**Comment:** MM36 - LPMM18/5804  **Respondent:** Lyndell Mussell 8902689  **Agent:**

In view of the lower housing needs, Blackwell Farm should be removed from the list of sites approved for development. (MM36).

**Attached documents:**

**Comment:** MM37 - LPMM18/5805  **Respondent:** Lyndell Mussell 8902689  **Agent:**

The proposed land for an access road between the A31 and Blackwell Farm would harm the AONB. (MM37)

**Attached documents:**

**Comment:** MM45 - LPMM18/615  **Respondent:** Phelim Brady 8906241  **Agent:**

I write to object to the Local Plan modifications as they apply to the proposed development of green belt land in Normandy/Flexford. This number of houses (105) is disproportionate in this location and will cause dangerous traffic congestion on a D road. Aesthetically it will blight the rural street scene and represents unwanted and destructive congestion.

This part of the Local Plan is opposed by the Parish Council, our MP, county councillor and the borough councillor who has said he will vote against it in council. This opposition was reflective of the views expressed at a very well attended meeting in the village hall. If this exercise in consultation and localism is anything other than cynical manipulation you should drop this proposal.
The proposed plan will not help solve the housing problem Surrey and Guildford have. We need cheap flats and small houses to accommodate young people that are affordable and centrally located near shops, entertainment and easy commuting hubs. A shop-less village, necessitating a car journey for every bottle of milk, with no social space for those under 60 is the wrong location for new development.

Developers want green field sites in high value locations while the borough council is too underpowered and badly led to be able to develop alternative capacity and so we are presented with dismal proposals such as this. A plan to dissolve the borough and county councils into a unitary authority, elected by proportional representation, would be a better use of energy than this assault on the green belt.

Attached documents:

Comment: MM2 - LPMM18/4092  Respondent: Tony and Margaret Walker 8907169  Agent:

We wish to register our belief that the Local Plan in its current draft form is unsound. We believe that the Council has not demonstrated that all the brownfield development possibilities, especially in the town centre, are being exploited and consequently cannot properly demonstrate that intentions to build in the green belt are necessary because of “exceptional circumstances”. We believe also that the town centre policy S3 is inadequate, that insufficient weight is given to infrastructure improvement there and that the plan relies too much on upgrades to the A3 that are conjectural, not being under Guildford’s control. Finally, the plan appears to be based on housing projections that we understand are now outdated (and which many have always believed to be overstated), and the public hearings ought to be reopened to review the consequences of this important issue.

Attached documents:

Comment: MM27 - LPMM18/1668  Respondent: Richard VanMellaerts 8907681  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/1664  Respondent: Richard VanMellaerts 8907681  Agent:

I am writing to object to the local plan Main Modifications as outlined below:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
• It is Green Belt containing ancient woodland
• It will join up Send and Ripley and constitute over development
• The site is subject to frequent flooding and contaminated by lead shot
• At least 800 extra cars will block up the adjacent roads

School and medical facilities will be strained to breaking point

**Attached documents:**

**Comment: MM41 - LPMM18/1669  Respondent: Richard VanMellaerts 8907681  Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

**Comment: MM42 - LPMM18/1665  Respondent: Richard VanMellaerts 8907681  Agent:**

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

• Since being deleted from the 2014 plan this has been increased twice, doubling the area
• It is by far the largest new industrial allocation in any village in the borough
• There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
• The Employment Land Needs Assessment showed a reduction in demand for industrial land
• This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand

Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

**Attached documents:**

**Comment: MM42 - LPMM18/1670  Respondent: Richard VanMellaerts 8907681  Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

554 of 2554
Comment: MM44  LPMM18/1666  Respondent: Richard VanMellaerts 8907681  Agent: 

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads

With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Comment: MM48  LPMM18/1671  Respondent: Richard VanMellaerts 8907681  Agent: 

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Comment: MM9  LPMM18/1667  Respondent: Richard VanMellaerts 8907681  Agent: 

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Other comments - LPMM18/1672  Respondent: Richard VanMellaerts 8907681  Agent: 

Attached documents:
Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM2 - LPMM18/4040  Respondent: Mr David Bullivant 8908289  Agent:

Regarding the modifications of GBC Local Plan, I would like to object to these modifications. Over the last few years we have repeatedly objected to the Local Plan in our area. I have listed on many occasions my objections and am horrified that you have added to the land south of the appeal site, which will completely overlook my property and land and completely ruin our historic hamlet, turning it into a large town of ridiculous proportions. Also, a lot of this land is constrained by the VOR (air traffic control beacon) which prevents any construction within a certain radius.

With regard to the rest of the modifications there are several points which are not acceptable. In view of the latest ONS statistics, which were released a few weeks ago, the GBC has not taken these figures into account and therefore your housing target is wrong, which means the plan is unsound. Also in MM2 - there should be no need for Guildford to take Woking’s unmet need, which would require further green belt release.

For all the above reasons we are calling for the hearing to be reopened, specifically so that the latest Office of National Statistics can be used. I would also like to advise that I support the representation made by WAG (Wisley Action Group), which was written with advice from Richard Harwood QC.

Attached documents:

Comment: MM23 - LPMM18/4042  Respondent: Mr David Bullivant 8908289  Agent:

Finally, I note that Strategic sites are to be exempt from design constraints! This will result in inappropriate developments such as that proposed on Three Farm Meadows. There is also no evidence that recent case law, such as “People over Wind” has been taken into account.

Attached documents:

Comment: MM41 - LPMM18/4043  Respondent: Mr David Bullivant 8908289  Agent:

MM41 - the transport strategy modelling, which is used by your plan, is inadequate. Specifically the fact that the delay in J10 of the M25 by Highways England RIS of at least two years will impact all development that relies on this scheme.

Attached documents:
MM9 - the infilling in and around villages will result in the weakening of protection of the countryside.

Attached documents:

Dear Sir / Madam

I have recently been informed by our local action group that we need to make any objections/comments regarding the modifications of the GBC Local Plan.

It seems that you are no longer sending us emails, along with thousands of other local residents, due to the GDPR issue. I received around 100 emails, regarding GDPR, from other companies/organisations, and, if I no longer wished to receive their emails, I notified them to that effect. I am assuming that your GDPR email has requested everyone to opt in to continue receiving the emails, which means that the majority of people did not read your email carefully enough and, like me, did not request to continue receiving them. **Please can you make sure you add my name to continue receiving your emails from immediate effect.**

Attached documents:

I write on behalf of the Burpham Community Association (BCA).

This statement sets out the formal response of the BCA to the Matters and Issues raised by the Inspector and should be read in conjunction with our earlier submissions to the Local Plan.

The Burpham Community Association was formed in 1973 in response to the proposal to build an incinerator at the nearby Slyfield Industrial Estate. It has since been involved in several major planning issues, including Martin Grant’s application to develop Gosden Hill in the 1980’s and Aldi’s two applications in 2012 and 2013, and subsequent appeals.

**MM1 Policy S1 Presumption in favour of sustainable development**

Para 4.1.4 The BCA would support this change as it gives added protection to specifically designated sites.

Attached documents:
MM2 Policy S2 Planning for the Borough – our spatial development strategy.

Para 3.1 These figures do not offer a reasonable calculation of housing need. Guildford has released Green Belt land to provide for its own needs and should not be expected to take up Woking’s unmet need, given their refusal to use their own Green Belt land.

Para 4.1.9(a) The statement refers to taking up unmet housing needs “where it is practical to do so.” We are aware that the Main Modifications refer to the new requirements of the 2018 NPPF which states that a statement of Common Ground is needed to justify Green Belt release. No such statement has been drawn up between Guildford and Woking.

Para 4.1.9ab We concur with the Burpham Neighbourhood Forum’s view that their estimate of 2,000 homes completed or with permissions since 2015 is an underestimation. Since 2015, 3,675 homes have been approved or completed, which leaves a sewer capacity of 325 homes. Clearly this is insufficient for the proposed housing number of 672 homes per annum let alone the total over the plan period. Thames Water has released its business plan for the period 2020-2025 which does not offer any financial provision to update Guildford’s capacity. This renders the Local Plan unsound.

Para 4.1.9ac The reduction in the housing number for Gosden Hill is to be welcomed but we are concerned that there is no indication given that the site allocation boundary will be amended to reflect this. We consider it vital that a defendable Green Belt boundary is achieved.

We feel strongly that the Examination should be re-opened as the housing figures are no longer up to date and do not provide a sound basis for the Plan or justify such extensive Green Belt loss. Given the newly released ONS figures, the expert employed by the Guildford Residents’ Association, Neil MacDonald, has shown that around 360 homes per year would be enough to support the economic growth rate proposed by the Inspector.

There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

Attached documents:

Comment: MM2 - LPMM18/2784  Respondent: Burpham Community Association (Liz Critchfield) 8908513
Agent:

We consider that the revised housing figures weaken the case for extensive Green Belt development.

Conclusion

The BCA has appreciated the opportunity to comment on the proposed modifications to the Local Plan. Our major concern is the recent publication of new ONS figures, which would significantly reduce the proposed housing figure of 672. We therefore ask that the Examination is re-opened to discuss the implications of this.

Attached documents:

Comment: MM20 - LPMM18/2769  Respondent: Burpham Community Association (Liz Critchfield) 8908513
Agent:

MM20 Policy E9 Local centres and isolated retail units
We agree with the revised wording. It is vital that any housing development has access to local facilities, especially food retail outlets.

**Attached documents:**

---

**Comment:** MM23 - LPMM18/2770  **Respondent:** Burpham Community Association (Liz Critchfield) 8908513  
**Agent:**  

MM23 Place Shaping

The importance of Master Planning is commendable and is especially important for Policy A25 (Gosden Hill Farm). This is of particular concern, as there is the possibility that some development may happen prior to any infrastructure improvements. We would find this unacceptable.

(9) Strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

(15), (16) The wording is a little vague – worthy suggestions, but no reference to infrastructure. How the planning process will deal with the Master Plan is also unclear. We would ask that the Local Plan requires approval of a Master Plan for Gosden Hill before any development takes place.

Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors and within settlements, as well as ensuring that the boundaries of settlements are screened by trees.

We feel that greater emphasis should be given to the height and bulk of development to respect the importance of views in and out of the town, especially bearing in mind the AONB. A building height limit should be introduced.

**Attached documents:**

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**Comment:** MM26 - LPMM18/2771  **Respondent:** Burpham Community Association (Liz Critchfield) 8908513  
**Agent:**  

MM26 Policy ID1 Infrastructure and Delivery

Para 4 We consider the wording is vague and could lead to inadequate infrastructure; the sentence should read –

*The imposition of Grampian conditions shall be considered as a means to secure the provision of infrastructure when it is needed.*

Paras 5a to 8 The wording needs to be more forceful to ensure that developers have no opportunity to ignore their responsibilities in respect of infrastructure provision.

**Attached documents:**
**Comment: MM28 - LPMM18/2772  Respondent: Burpham Community Association (Liz Critchfield) 8908513  
Agent:**

MM28 Policy ID3 Sustainable transport for new developments.

Policy Paras 4 and 5a We do not agree with using legal obligation to restrict the use of cars. Developers must provide adequate parking provision for any proposed development. We also strongly object to the suggestion that car free new developments could be considered; this is totally unrealistic and could be considered to discriminate against groups of people reliant on personal transport.

**Attached documents:**

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**Comment: MM3 - LPMM18/2766  Respondent: Burpham Community Association (Liz Critchfield) 8908513  
Agent:**

MM3 Policy S3 Delivery of development and regeneration within Guildford Town Centre

We support the “Town Centre first” approach but are concerned that only the White Lion Walk site, providing 50 homes, could be found. This hardly accords with the Inspector’s requirement to make greater use of the town centre for residential use. How can the Green Belt incursions be justified if the residential potential in the urban area is not realised?

The retail industry still faces an uncertain future and we feel that consideration should be given to increase the ratio of homes to retail and entertainment.

(5) New town centre development should avoid adverse impact on surrounding residential areas. We consider there should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing.

**Reasoned Justification**

Para 4.1.19 Subsection (g) refers to a “drive to, not through” concept. This takes no cognisance of the fact that Guildford is a gap town and the phrase should therefore be deleted, as there is no indication in the plan of external roads infrastructure to cope with this issue.

There is no reference to the importance of bus connections, or to the possibility of underground car parks; we feel this should be included.

**Attached documents:**

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**Comment: MM32 - LPMM18/2773  Respondent: Burpham Community Association (Liz Critchfield) 8908513  
Agent:**

Site Allocations Summary Table

A60

The Council would appear to have taken little cognizance of the Inspector’s comment about using the town centre for more housing. Putting just 50 extra dwellings in the town suggests minimal enthusiasm and the Council should make a far greater effort.
A60 to A 64
All these sites are Green Belt land, an easy get out rather than consideration of urban areas.

MM33 Policy A241 Slyfield Area Regeneration
This is dependent on the re-siting of the current sewage works, a subject much debated over many years but no nearer agreement. The number of new dwellings proposed in the Local Plan makes an efficient sewage treatment plant essential; we would look for a rational, practical and affordable approach to this issue.

MM35 Policy A25 Gosden Hill Farm, Merrow Lane, Guildford
The reduction in proposed housing numbers is welcome but we have many reservations about this allocation.

Transport strategy and other infrastructure.
We consider the transport strategy is untenable.
(2) The opening sentence is so vague as to be meaningless. An all-ways junction on the A247 is not going to solve future traffic problems; it should be located further to the south, closer to Potters Lane.
(4) The Sustainable Movement Corridor is not a viable proposition. The A3100 London Road through Burpham is not wide enough to accommodate additional bus and cycle lanes. This road is already congested and additional traffic will exacerbate the problem.

(5) Local bus services have already been cut because of traffic congestion in Burpham roads so the provision of new bus services in even more congested roads seems at odds with reality.

(6) The aforementioned volume of traffic with the concomitant issue of pollution makes a very dangerous environment for pedestrians and cyclists.

(7) Back in the 1980’s, Guildford Borough Council were concerned that a railway station at Merrow would mean that any new development on Gosden Hill Farm would become a dormitory for London rather than provide homes for local people. We agreed then and still do today.

(8) We take issue with the use of the word “mitigate.” All supporting infra structure must be part of the whole development proposal.

We consider that the revised housing figures weaken the case for extensive Green Belt development.

Attached documents:

**Comment:** MM37 - LPMM18/2775 **Respondent:** Burpham Community Association (Liz Critchfield) 8908513

**Agent:**

A60 to A 64

All these sites are Green Belt land, an easy get out rather than consideration of urban areas.

**Attached documents:**

**Comment:** MM39 - LPMM18/2776 **Respondent:** Burpham Community Association (Liz Critchfield) 8908513

**Agent:**

A60 to A 64

All these sites are Green Belt land, an easy get out rather than consideration of urban areas.

**Attached documents:**

**Comment:** MM41 - LPMM18/2777 **Respondent:** Burpham Community Association (Liz Critchfield) 8908513

**Agent:**

A60 to A 64

All these sites are Green Belt land, an easy get out rather than consideration of urban areas.
A60 to A 64

All these sites are Green Belt land, an easy get out rather than consideration of urban areas.

Attached documents:

A60 to A 64

All these sites are Green Belt land, an easy get out rather than consideration of urban areas.

Attached documents:

A60 to A 64

All these sites are Green Belt land, an easy get out rather than consideration of urban areas.

Attached documents:

MM5 Policy H1 Homes for all

Para 4.2.23 indicates there is no evidence of the need for a travellers’ Transit Site. There have been several traveller incursions in Burpham in the last few years, most recently in March this year. Such events can cause considerable disruption and we feel there should be a Transit Site to avoid illegal parking; we note Commissioner Munro’s advice (June 2018) which recommended their introduction in Surrey.

Attached documents:
Comment: MM6 - LPMM18/2768  Respondent: Burpham Community Association (Liz Critchfield) 8908513  
Agent:

MM6 Policy H2 Affordable homes

We agree with the increased threshold from 5 to 10 dwellings.

Attached documents:

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Comment: MM2 - LPMM18/4547  Respondent: Diana Grover 8909761  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.
I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years' time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy

**Attached documents:**

**Comment:** MM23 - LPMM18/4550  **Respondent:** Diana Grover 8909761  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.
MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4558  Respondent: Diana Grover 8909761  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/4548  Respondent: Diana Grover 8909761  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:
Comment: MM31 - LPMM18/4551  Respondent: Diana Grover 8909761  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4552  Respondent: Diana Grover 8909761  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4553  Respondent: Diana Grover 8909761  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/4554  Respondent: Diana Grover 8909761  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/4556  Respondent: Diana Grover 8909761  Agent:
MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/4557  Respondent: Diana Grover 8909761  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/4549  Respondent: Diana Grover 8909761  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/4373  Respondent: Colette Clegg 8910273  Agent:

I have been informed by our local action group that we need to make any objections/comments regarding the modifications of the GBC Local Plan. Firstly, I am no longer receiving emails from you with respect to the Local Plan which I have been told is due to GDPR issues. I do not recall having seen an email from you on this topic nor being asked to opt in or out of your mails (I would have opted in). Can you therefore make sure you add my name to continue receiving your emails from immediate effect.

Regarding the modifications of GBC Local Plan, I would like to object very strongly to these modifications. Over the last few years I have repeatedly objected to the Local Plan in our area (in particular the inclusion of Three Farms Meadow as a strategic site) as being not suitable but, more importantly, not sustainable given the lack of a viable transport plan for such a large new town. Also the whole plan is based both on out of date ONS statistics, which justify a far higher target than is actually required, and a seemingly self imposed requirement to help fill Woking’s unmet needs (MM2).

Attached documents:

Comment: MM23 - LPMM18/4376  Respondent: Colette Clegg 8910273  Agent:

Finally, I note that Strategic sites are to be exempt from design constraints. This will result in inappropriate developments such as that proposed on Three Farm Meadows. There is also no evidence that recent case law, such as “People over Wind” has been taken into account.
For all the above reasons I am calling for the hearing to be reopened, specifically so that Traffic issues can be properly assessed and the latest Office of National Statistics can be used. I would also like to advise that I support the representation made by WAG (Wisley Action Group), which was written with advice from Richard Harwood QC.

Attached documents:

Comment: MM41 - LPMM18/4375  Respondent: Colette Clegg 8910273  Agent:

However, the key objection which should be of concern to all of Surrey, is regarding the transport strategy. MM41 - the transport strategy modelling, which is used by your plan, is inadequate. Specifically the fact that the delay in J10 of the M25 by Highways England RIS of at least two years will impact all development that relies on this scheme. In addition the fact that there is no suitable rail infrastructure with capacity and within a suitable distance of the site means that the site is wholly dependent on car transport. This will put too much traffic onto the already overcrowded local road network and is, by definition, unsustainable and dangerous. Given the issues with J10 of the M25, this will, in effect, put a congestion “stopper” in the top of Surrey. Moreover, I do not believe that the Highways England scheme to develop J10 will have any impact on the congestion levels as the issue lies not with the A3 but with the M25 - the M3/M25 junction has a similarly improved junction and the congestion there continues to be very severe.

Attached documents:

Comment: MM50 - LPMM18/4374  Respondent: Colette Clegg 8910273  Agent:

Regarding MM47, the size of the SNCI is drastically reduced, which is not acceptable and there is no justification for it. It will destroy the biodiversity of this area. I also understand that an Appropriate Assessment and a Habitats Regulation Assessment have not been completed which is a breach of case law.

Attached documents:

Comment: MM2 - LPMM18/4616  Respondent: Anne Elkington 8910817  Agent:

I would like register my objections to the new local plan, strategy and sites modifications.

1. NUMBER OF HOUSES (MM2)

I object to the planned 12,600 new houses. The recent ONS household forecast has reduced by 6,635 (40%) since the previous forecast, and this needs to be reflected in the Plan. This reduction in households is roughly equivalent to two strategic sites plus all five of the new sites that were included after the Local Plan Examination in Public, and cannot be ignored. The Plan should be updated and resubmitted to the Planning Inspector.

Attached documents:
2. NEW POLICY S3 ON THE TOWN CENTRE (MM3)

The new Town Centre Policy does not include details of what is planned for the town, whereabouts it is planned, or when it is proposed that it should happen. At the Examination in Public the Council stated that the need to demonstrate a 5-year housing supply had led them to allocate rapidly developable sites that were at the least sustainable, and were at the bottom of the hierarchy. The Town Centre Policy should be revised to take advantage of the sustainable opportunities in the town centre, and to reduce the development of sites in the Green Belt. I strongly object to any building on the Green Belt when there are alternatives.

Attached documents:

Comment: MM40 - LPMM18/4619  Respondent: Anne Elkington 8910817  Agent:

4. POLICY A35: FORMER WISLEY AIRFIELD (MM40)

The inclusion of Wisley airfield as a development site in the Local Plan ignores the recent dismissal of planning appeal on that site by Secretary of State. The traffic impacts of the proposed development would be the same as those just rejected by the Secretary of State, and are therefore unacceptable, as are the impacts on the local infrastructure (parking, medical provision, schooling etc), particularly when ONS household projections, on which the Local Plan should be based, have been reduced by 40%.

The Site of Nature Conservation Importance (SNCI) which used to cover the entire airfield site has been reduced to about 15-20% of its former size, and about one third of that residual area is land that is “safeguarded” for waste operations. This is inconsistent with paragraph 10(a) of the Policy A35 which states that “Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.”

I object to the inclusion of the site.

Thank you for taking account of my views during the consultation period.

Attached documents:

Comment: MM9 - LPMM18/4618  Respondent: Anne Elkington 8910817  Agent:

3. POLICY P2: GREEN BELT (MM9)

Given the greatly reduced housing projections from ONS, and the fact that 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt, then by definition the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist. I strongly object to development in Green Belt under these circumstances.

Attached documents:

Comment: MM45 - LPMM18/2352  Respondent: A.P. Glazier 8911457  Agent:
RE MM45 Policy A64

Just had water supply etc checked, and new wonderful footpaths, and now another "major new housing"
The lane is used by large vehicles unable to get under bridge in Westwood Lane, and is always busy.

At present time building work on 2 houses in Lane causing difficulties for pedestrians and vehicles. So another housing development will cause complete havoc on that area of Lane Bridge over railway.

Do the GBC Planning Dept ever get off their seats and take a trip of the area?

Attached documents:

Comment: MM27 - LPMM18/4164 Respondent: Lynda Newland 8913985 Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/4158 Respondent: Lynda Newland 8913985 Agent:

MM41 Land at Garlick’s Arch, Send Marsh, policy A43

An increase of 37% in the number of houses proposed is excessive and actually increases to 45% if Aldertons, Clockbarn and Winds Ridge are included.

There is no infrastructure to support this increase and it will completely change the character of Send Marsh as a semi rural village.

There is only one school and one medical centre which are already at maximum capacity.

The roads are already congested at peak times and an increase of approximately 800 cars will bring the area to a standstill.

Attached documents:

Comment: MM41 - LPMM18/4162 Respondent: Lynda Newland 8913985 Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM42 - LPMM18/4159  **Respondent:** Lynda Newland 8913985  **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

Since being deleted from the 2014 plan this has been increased twice, doubling the area

It is by far the largest new industrial allocation in any village in the borough

There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9

The Employment Land Needs Assessment showed a reduction in demand for industrial land

This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand

Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Attached documents:

**Comment:** MM42 - LPMM18/4160  **Respondent:** Lynda Newland 8913985  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM44 - LPMM18/4160  **Respondent:** Lynda Newland 8913985  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63**

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July

It is a Green belt site with no special circumstances so it contradicts policy MM9
It will detract from the heritage buildings at Send Marsh Green

The additional traffic will increase pressure at the Send Crossroads and the already congested junction of Send Marsh Road and Portsmouth Road

Attached documents:

Comment: MM48 - LPMM18/4165  Respondent: Lynda Newland 8913985  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/4161  Respondent: Lynda Newland 8913985  Agent:

MM9 Green Belt Policy

Although the “modification” claim to protect the Green Belt except in very special circumstances, GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM51 - LPMM18/4620  Respondent: Lynne Carr 8914721  Agent:

I completely support and endorse that the village settlement boundary has been brought back to Silkmore Lane’s defensible property boundary, thus protecting this beautiful area from development of the precious greenbelt land. I understand there may be objections to this modification. I believe it is essential to protect this beautiful land for visitors from outside the village, as well as for ourselves. This land is used partly for fine crops and regularly by many for walks every day on their way to such places as Hatchlands. As a people, we all so need open spaces to breathe, relax and walk in.

I hope you take our wishes very seriously and trust that the planners will stand by their decision not to permit any development which would spoil these lovely fields.

Attached documents:
I strongly object to A64, a major development on Greenbelt in Flexford and a main modification in the draft local plan. It must be removed for the following reasons.

A64 is a new site that has not appeared in previous versions of the draft local plan or ever put out to consultation.

No 'exceptional circumstances' have been submitted by Guildford Borough Council to move the Greenbelt boundary in Normandy.

I find it incredible that a major development of this size has, out of the blue, been proposed by GBC. The site is in Greenbelt, is categorised as red as a site of extreme sensitivity. It would impact on the openness of Normandy and Flexford up to the AONB and views from the AONB across Flexford and Normandy to the THBSPA. Site A64 would urbanise and destroy the distinct and unique rural characters of Flexford and Normandy.

In GBC’s own Sustainability Assessment, Flexford is the most smallest and rural, "There are no existing facilities in Flexford and so it is not possible to argue that development would help secure the long term future of village facilities, and hence contribute to village vitality in this way.” A64 will not bring any benefits whatsoever to Flexford but with a 7% increase in housing will only make the existing infrastructure a lot worse.

Glaziers Lane is a category 'D' road. The traffic congestion in the local and surrounding locations are well documented and acknowledged, there is also a lack of infrastructure and facilities to accommodate another 105 homes.

Rather than destroying a site of extreme sensitivity a much more suitable and sustainable location for housing is Guildford Town Centre with a public transport hub, infrastructure, shopping facilities, entertainment etc. One example is North Street, Guildford, run down, with empty shops, ugly architecture from 60's to the 90's, crying out for creative and sensitive design to rejuvinate the whole area with new homes, rather than GBC’s vision of unrealistic emphasis on yet more retail space. Potentially Debenhams and House of Frazier could be the High Street's next victims. Shopping habits have changed radically and GBC need to move with the times!

The Office for National Statistics has published a revised population growth of 45% fewer households in Guildford. This is a significant reduction in 'housing need' which must be considered by Guildford Borough Council and Mr Bore the planning inspector. The borough's 'housing need' targets in the draft local plan must be lowered by 45% to reflect the revised projections. This would protect and preserve the extremely sensitive Greenbelt site, A64 from inappropriate development proposed by GBC.

By reducing the housing targets by 45% to the revised projections, developing redundant, empty shops, boarded up houses, for example North Street into well designed and sustainable homes will invigorate Guildford Town Centre. Well designed development here will be positive, beneficial and economic. To build excessively on Greenbelt land in rural areas only creates negativity, congestion, overloads the infrastructure, is totally unsustainable and brings no benefits to rural areas at all.

Please protect and preserve the extremely sensitive Greenbelt site, A64 from inappropriate development and remove it from the local plan. You have already acknowledged there is no benefit to Flexford and Normandy whatsoever.

Attached documents:
I object to the planned 12,600 new houses. The recent ONS household forecast has reduced by 6,635 (40%) since the previous forecast, and this needs to be reflected in the Plan. This reduction in households is roughly equivalent to two strategic sites plus all five of the new sites that were included after the Local Plan Examination in Public, and cannot be ignored. The Plan should be updated and resubmitted to the Planning Inspector.

Attached documents:

Comment: MM3 - LPMM18/4992  Respondent: Tim Elkington 8915777  Agent:

2. NEW POLICY S3 ON THE TOWN CENTRE (MM3)

The new Town Centre Policy does not include details of what is planned for the town, whereabouts it is planned, or when it is proposed that it should happen. At the Examination in Public the Council stated that the need to demonstrate a 5-year housing supply had led them to allocate rapidly developable sites that were at the least sustainable, and were at the bottom of the hierarchy. The Town Centre Policy should be revised to take advantage of the sustainable opportunities in the town centre, and to reduce the development of sites in the Green Belt. I strongly object to any building on the Green Belt when there are alternatives.

Attached documents:

Comment: MM40 - LPMM18/4994  Respondent: Tim Elkington 8915777  Agent:

4. POLICY A35: FORMER WISLEY AIRFIELD (MM40)

The inclusion of Wisley airfield as a development site in the Local Plan ignores the recent dismissal of planning appeal on that site by Secretary of State. The traffic impacts of the proposed development would be the same as those just rejected by the Secretary of State, and are therefore unacceptable, as are the impacts on the local infrastructure (parking, medical provision, schooling etc), particularly when ONS household projections, on which the Local Plan should be based, have been reduced by 40%.

The Site of Nature Conservation Importance (SNCI) which used to cover the entire airfield site has been reduced to about 15-20% of its former size, and about one third of that residual area is land that is “safeguarded” for waste operations. This is inconsistent with paragraph 10(a) of the Policy A35 which states that “Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.”

Attached documents:

Comment: MM9 - LPMM18/4993  Respondent: Tim Elkington 8915777  Agent:

3. POLICY P2: GREEN BELT (MM9)

Given the greatly reduced housing projections from ONS, and the fact that 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt, then by definition the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist. I strongly object to development in Green Belt under these circumstances.
Comment: MM13 - LPMM18/5767  Respondent: Ockham Parish Council (Mr Peter Bevan) 8916001  Agent:

MM13: there is significant and unrealistic over allocation for retail in the Guildford Town Centre. The evidence base for retail is not only out of date but current and likely future trends, particularly online shopping, are not properly taken into consideration. The need is for more sustainable housing, not more retail, in the Town Centre.

Attached documents:

Comment: MM2 - LPMM18/5765  Respondent: Ockham Parish Council (Mr Peter Bevan) 8916001  Agent:

Ockham Parish Council (OPC) has reviewed these Proposed Main Modifications and has also seen and supports the representations made by the Wisley Action Group on advice from Richard Harwood QC. OPC wishes to make the following objections and comments.

1. General
2. MM2: The housing target is not, but should be, based on the latest (September 2018) ONS projections. The target is therefore incorrect and should be adjusted downwards.

Additionally, Guildford Borough has no requirement to take up Woking’s unmet need for housing.

The decreased housing requirement reduces the case for Green Belt releases and the exceptional circumstances necessary to support all the selected development sites do not exist.

2. The addition of a further and car dependent 500 houses in Send will severely and adversely impact the Portsmouth Road/High Street in Ripley, a factor which has not fully or properly been considered.
3. The proposed additional releases of Green Belt land do not conform with the Spatial Development Strategy which requires development to take place firstly in the town centre, the urban areas and on brownfield land.

Attached documents:

Comment: MM23 - LPMM18/5768  Respondent: Ockham Parish Council (Mr Peter Bevan) 8916001  Agent:

MM23: Policy D1 dilutes the requirement for the social aspects of sustainability such as appropriate pedestrian and cycle routes and reasonable walking distances.

Attached documents:

Comment: MM41 - LPMM18/5769  Respondent: Ockham Parish Council (Mr Peter Bevan) 8916001  Agent:
MM41: the Transport strategy is based on inadequate and out of date modelling, not least as a result of the announced delay of 2 years or more in the J10 Highways England RIS scheme. This will significantly impact proposed developments which rely on that scheme such as at A35 (Three Farms Meadows/the former Wisley airfield) and A43 (Garlicks Arch),

The “strategic sites” are perversely stated to be exempt from a number of design constraints. Such constraints are all the more important for large sites and developments.

Recent case law such as in “People over Wind” has apparently not been taken into account.

Attached documents:

Comment: MM47 - LPMM18/5770  Respondent: Ockham Parish Council (Mr Peter Bevan) 8916001  Agent:

Specific : Site A35 – Three Farms Meadows/the former Wisley airfield

The late, and OPC considers ill thought through, addition of land to the south of the site: (a) directly abuts and significantly prejudices the Ockham Conservation Area; (b) further increases the visibility of the site to and from the Surrey Hills Area of Natural Beauty; (c) has no safe access; and (c) does not in reality materially mitigate the issue of density as development on much of the extra land is constrained by the existence of the VOR.

MM47: the size of the Site of Nature Conservation Importance is drastically reduced without justification and notwithstanding that the whole area qualifies for SNCI status on ecological grounds. The biodiversity of the SNCI will be destroyed by the proposed development.

Contrary to case law, an Appropriate Assessment and a Habitats Regulation Assessment have not been completed.

Both individually and collectively, these are grounds for the Local Plan as a whole to be re-examined and specifically for Site A35 (which the Secretary of State has already pronounced to be unsustainable) to be taken out of the Plan.

Attached documents:

Comment: MM9 - LPMM18/5766  Respondent: Ockham Parish Council (Mr Peter Bevan) 8916001  Agent:

MM9: infilling in and around villages will result in further weakening of protection of the countryside.

Attached documents:

Comment: MM2 - LPMM18/5422  Respondent: David White 8916193  Agent:

Please note it is my view that the Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination.

3. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Attached documents:

Comment: MM3 - LPMM18/5424  Respondent: David White 8916193  Agent:

3. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

Attached documents:

Comment: MM41 - LPMM18/5423  Respondent: David White 8916193  Agent:

2. There is too much reliance on A3 improvements and they are beyond the council’s control

Attached documents:

Comment: MM45 - LPMM18/5564  Respondent: R Atkins 8916673  Agent:

I would like to object to the Normandy proposal (MM45 RE POLICY A64) on the following basis,

1) The village contains no facilities and a further 105 houses would have no local amenities or serve any benefits to existing householders.

2) The infrastructure is unable to cope with the current level of housing even without a further 105 houses.

3) Flexford and Normandy are small and rural and hence unsuitable for an additional 105 houses.

4) More efforts should be made to build houses on brownfield sites in Guildford where facilities and amenities exist.

5) Previous applications on the site have been rejected on the basis that damage would be inflicted on the green belt and its openness.

Attached documents:

Comment: MM2 - LPMM18/4897  Respondent: Andrene Aaronson 8916769  Agent:
I am writing in response to the Guildford local plan and with particular reference the Main Modification MM45 relating to Policy A64.

I am greatly concerned at the way that the proposed development completely undermines the main purpose of the Green Belt which is to prevent urban sprawl by keeping land permanently open: building on this site will destroy exactly this openness and yet another piece of the jigsaw which is our precious countryside will be lost. Flexford and Normandy are two settlements, not one, and there are no “exceptional circumstances” which justify this infilling. The two villages are currently separated by the railway and this small area of land is part of an important wildlife corridor running east-west between the villages.

I recognise that we need further affordable housing provision but I am puzzled at the housing number used by GBC to justify the development as it does not appear to square with the latest household formation projections from the ONS.

Attached documents:

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Comment: MM45 - LPMM18/4898  Respondent: Andrene Aaronson 8916769  Agent:

And then there is the question of whether the proposed location is suitable for a volume of houses given that Glaziers Lane is a D Road, with a dangerous chicane on the bridge over the railway, prone to flooding and subsidence at the northern end of the Lane, and part of dangerous current traffic congestion north to the Guildford crossroads and south to the A31.

Although I was unable to attend the public meeting in Normandy on 2 October, I understand that there was a remarkable turnout demonstrating the strength of feeling in the village. And that the universal view was that this development is unsuitable and will benefit neither the current community nor those who really need affordable housing and would find themselves ill-served by the current facilities and infrastructure in the village.

Thank you for taking account of my views.

Attached documents:

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Comment: MM2 - LPMM18/4906  Respondent: Gillian McWilliams 8916929  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common.
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9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
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**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.
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MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM2 - LPMM18/5268  
**Respondent:** Gillian McWilliams 8916929  
**Agent:**

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<tbody>
<tr>
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<td>MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address <strong>character</strong> adequately.</td>
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<td>MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A <strong>height limit</strong> should be introduced given the importance of the rise and fall of the downs in the urban landscape.</td>
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<tr>
<td>In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.</td>
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In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

Attached documents:

Comment: MM3 - LPMM18/4907  Respondent: Gillian McWilliams 8916929  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

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Comment: MM31 - LPMM18/4910 Respondent: Gillian McWilliams 8916929 Agent:

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Comment: MM32 - LPMM18/4911 Respondent: Gillian McWilliams 8916929 Agent:

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Comment: MM32 - LPMM18/5279 Respondent: Gillian McWilliams 8916929 Agent:
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**Attached documents:**

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**Comment:** MM33 - LPMM18/4913  **Respondent:** Gillian McWilliams 8916929  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

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**Comment:** MM33 - LPMM18/5281  **Respondent:** Gillian McWilliams 8916929  **Agent:**

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**Attached documents:**

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**Comment:** MM35 - LPMM18/4914  **Respondent:** Gillian McWilliams 8916929  **Agent:**

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**Attached documents:**

**Comment: Other comments - LPMM18/1771**  **Respondent: Frances Porter 8917665  Agent:**

Dear Sir/Madam

I feel very strongly that the examination in public should be reopened so that latest info and statistics can be used.

I only heard about this via someone else. I have not had any formal notification. Not sure this is a true public consultation if people don’t get notified.

I fully support WAG and their representations.

**Attached documents:**

**Comment: MM45 - LPMM18/1530**  **Respondent: A.I. Olley 8918497  Agent:**

As a lifetime resident of Glaziers Lane, Normandy I write to object to the proposal to build 105 houses over a three year period on Green Belt land to the north of the railway line east of Glaziers Lane. Surely there are brownfield sites in the Guildford area where these properties could be built. Are there exceptional circumstances why this site has been chosen particularly as this would have an adverse effect on the Surrey Hills Area of Outstanding Natural Beauty? This would have an adverse impact on the vista from the Hogs Back in the AONB. I recall too, that planning applications on this site have been refused in the past. Why has this now changed?

The development would, I understand, result in a increase of 7% in the size of Normandy without any improvements in the infrastructure. The roads and sewerage systems are already overloaded, there are no shops in the village and only a sub surgery from Fairlands Medical Centre coping with the population of the village. The access to and from the site also gives real cause for concern as it will inevitably be extremely close to the bridge over the railway line. The bridge is narrow and would not cope with all the extra traffic it would have to carry particularly whilst the building was taking place and it would be impossible for heavy lorries etc to pass each other on the top of the bridge and accidents would be inevitable.

There is a fishing lake occupying a large part of the site –what would happen to this? There is also the question of the site’s proximity to the Strawberry Farm waste management site-could this create possible environmental hazards-has this been assessed?

I trust my concerns will be carefully considered.

**Attached documents:**
Comment: MM2 - LPMM18/5638  Respondent: Andrew Kukielka 8919009  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments: A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well. B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited. There is too much reliance on A3 improvements and these are beyond the council’s control. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’. C. I would like the Inspector to RE-EXAMINE the Local Plan because:1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high. In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road. The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247. I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents. What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge. The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A2473. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh. The development of 1800 houses at Gosden Hill. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A2476. The conversion of the Burnt Common roundabout to an all-ways junction with
the A37. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are: 1. The junction with the current A3 south-bound slip road (modifications are underway). 2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph. 3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station. 4. The sight lines for the exit of the Onslow Arms car park. 5. The narrowness of the road near Summers. 6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement. 7. The sharp bend near Clandon Regis. 8. The narrowness of the road at the Bull’s Head. 9. The Clandon Junior School and the, in places, narrow footpath for children walking to school. 10. The sharp bend with poor sight lines in either direction at the church. 11. No continuous footpath through the length of the village. 12. The speed of traffic. 13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker. The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.
MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

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Comment: MM44 - LPMM18/5649  Respondent: Andrew Kukielka 8919009  Agent:  

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Attached documents:

Comment: MM27 - LPMM18/2648  Respondent: Andrew Russell 8920353  Agent:  

Guildford Local Plan: Strategy and Sites - Main Modifications 2018  

As a Chartered Surveyor operating in Guildford dealing with property matters on a daily basis I am particularly perturbed that the bulk of the new housing being proposed in the Guildford Local Plan does appear to be in the North-West section of the Borough, specifically in the Send, Ripley, Burnt Common area etc. Additionally I would comment on the transport strategy as follows:

MM27, MM41, MM42 and MM48  

As a resident in Send Marsh I use the car every day for travel to and from work and it is preposterous that no proper assessment as to the aggregate traffic impact on Send Barns Lane and Send Marsh Road will be affected. The pace of development in Woking and the proposed scale of new residential development in Guildford and more specifically Garlicks Arch (MM41) and potentially Aldertons Farm (MM44) will have a major impact on the roads in the immediate area, a situation which has got steadily worse during the last five to ten years.
Whilst I accept that there has been population growth Surrey and particularly West Surrey, is a popular place to live and the traffic implications for Send Marsh are worrying. The A3 is gridlocked on a regular basis, particularly during school term time and it often takes me over an hour to reach the office which via the A3 is only some 5.5 miles distant.

The proposed development is 550 houses at Garlicks Arch, 60 units at Clockbarn, 40 units at Winds Ridge adds over 770 houses to the 1,700 currently in Send, an increase of some 45% which is simply too much for the current infrastructure to accommodate.

I find it abhorrent that Guildford Borough Council are proposing to set aside such an astronomical number in the North-West part of the Borough when there are far more appropriate sites for development closer to Guildford Town Centre where there are adequate transport nodes, particularly following the recent consent on appeal for the redevelopment of Guildford mainline railway station.

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MM41 - Land at Garlicks Arch, Send Marsh:

It is staggering that there is a potential for an increase of 150 homes from the original 400 proposed to 550 which is an increase of some 37%, notwithstanding the fact that 7,000 objections to the previous lower number have already been raised! It is a Green Belt area containing ancient woodland and will effectively form a link between Send and Ripley and surely must be considered as over-development completely out of character with the surrounding area. Such a development will elicit a phenomenal number of extra cars, whilst the existing educational and medical facilities which are already at breaking point will be strained even further.

Attached documents:

Comment: MM42 - LPMM18/2650  Respondent: Andrew Russell 8920353  Agent:
MM27, MM41, MM42 and MM48

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I find it abhorrent that Guildford Borough Council are proposing to set aside such an astronomical number in the North-West part of the Borough when there are far more appropriate sites for development closer to Guildford Town Centre where there are adequate transport nodes, particularly following the recent consent on appeal for the redevelopment of Guildford mainline railway station.

MM42 - Land at Burnt Common Road, Send:

The original proposal of 7,000 sq metres has now been doubled to some 14,800 sq metres, a phenomenal amount of industrial property that I would question is necessary. As an active commercial property agent dealing with amongst other issues Industrial and Warehouse property. There are far more appropriate Industrial locations in Guildford, more specifically Slyfield which is owned by Guildford Borough Council where there is a significant amount of unused capacity.

The Employment Land Needs Assessment demonstrated a reduction in demand for Industrial Land, not an increase in demand. Guildford has never been a major distribution hub and given the amount of available Industrial/Warehouse property on the market at the present time, I question the need for such a significant increase in industrial floor-space which will only increase vehicle movement and more specifically the movement of large Commercial vehicles.

Attached documents:

Comment: MM44 - LPMM18/2652  Respondent: Andrew Russell 8920353  Agent:

MM44 - Land at Aldertons Farm, Send Marsh:

The allocation of Aldertons Farm for some 120 homes is in my view completely and utterly wrong. Send Marsh has a particular character and feel, not least a number of listed buildings fronting the Send Marsh Green. The development of new housing which, I understand is under option in favour of one of Britain's leading housebuilders (Barratt Homes) will detract from the period buildings fronting Send Marsh Green and more specifically is a blatant example of new development which should not happen given the Green Belt status of the current site. This is the thin end of the wedge and I find it abhorrent that the Council will countenance the development of such a site given the unique style and character of Send Marsh and the semi-rural feel that currently prevails. In short, on top of the Garlicks Arch development this will simply prove too much of a burden for the existing road network.

As referred to above this 'in-filling' outside identified Settlement boundaries is subjective and undermines Green Belt protection. It points to any land on the edge of any village potentially being picked off for Urban Development, not one or two houses potentially being built in accordance with appropriate materials reflecting the heritage of the immediate
enviroment, but large scale development in 'Housing Estate' format which in my view is totally inappropriate for Send Marsh and will undermine and alter the character of the village forever.

The Green Belt really came to fore in 1947 under The Town & Country Planning Act when Local Authorities were allowed to include Green Belt property in the local plans. The intention was for the Green Belt to act as a buffer to protect urban sprawl. The policies being proposed by Guildford Borough Council are in direct contradiction to the original and defined objective of preventing urban expansion and the potential 'linkage' of Towns and Villages. Once Green Belt land is developed, it has gone forever.

In summary, the proposed nature of development in Send and indeed Gosden Farm in Merrow is going to fundamentally change the character of the area forever and I find it extremely concerning that this scale of development is being counternanced, the policies relating to housing in the Borough needs to be re-examined particularly in relation to MM44 and MM41.

Attached documents:

**Comment:** MM48 - LPMM18/2651  **Respondent:** Andrew Russell 8920353  **Agent:**

**MM27, MM41, MM42 and MM48**

As a resident in Send Marsh I use the car every day for travel to and from work and it is preposterous that no proper assessment as to the aggregate traffic impact on Send Barns Lane and Send Marsh Road will be affected. The pace of development in Woking and the proposed scale of new residential development in Guildford and more specifically Garlicks Arch (MM41) and potentially Aldertons Farm (MM44) will have a major impact on the roads in the immediate area, a situation which has got steadily worse during the last five to ten years.

Whilst I accept that there has been population growth Surrey and particularly West Surrey, is a popular place to live and the traffic implications for Send Marsh are worrying. The A3 is gridlocked on a regular basis, particularly during school term time and it often takes me over an hour to reach the office which via the A3 is only some 5.5 miles distant.

The proposed development is 550 houses at Garlicks Arch, 60 units at Clockbarn, 40 units at Winds Ridge adds over 770 houses to the 1,700 currently in Send, an increase of some 45% which is simply too much for the current infrastructure to accommodate.

I find it abhorrent that Guildford Borough Council are proposing to set aside such an astronomical number in the North-West part of the Borough when there are far more appropriate sites for development closer to Guildford Town Centre where there are adequate transport nodes, particularly following the recent consent on appeal for the redevelopment of Guildford mainline railway station.

Attached documents:

**Comment:** MM2 - LPMM18/3330  **Respondent:** Mr Glen Travers 8920865  **Agent:**

Re: Guildford Local Plan

Representations on the main modifications published in September 2018

I begin by saying that I agree with everything written by Ockham Parish Council and Wisley Action Group and object to the main modifications as follows:
I wish to point out that a general difficulty with the modifications is that no justification is put forward as to why the modification has to be made. A main modification may only be made if the plan as submitted is unsound and the modification is required to make it sound. It is not apparent why most of the modifications might be thought to be required to address a soundness failure, let alone to evaluate whether they are.

MM2

The housing requirement should be calculated from the starting point of the latest, September 2018, ONS projections rather than the projections released earlier in 2018. These reduce the net increase in households on those projections from 420 per annum to 325 per annum.

The housing requirement figures should therefore be adjusted downwards.

This reduces the case for Green Belt releases and there are not the exceptional circumstances which are necessary to support all of the sites. Fewer Green Belt sites ought therefore to be released, with the unsustainable site of Former Wisley Airfield/Three Farm Meadows (FWA/TFM) the first to go.

We note that the Inspector has sought the Council’s views on those ONS figures (ID/10), but given their significance ought to be asking the examination participants more generally for their views.

MM2 – 4.1.11

The revised housing trajectory projects the first homes coming from FWA/TFM in 2022/23. However, the M25 Junction 10 works are said to need to be completed before any units can be occupied at the site. Given the delays to the Junction 10 project, the trajectory is unrealistically optimistic. The start date for commencement of works on J10/M25 roundabout has been pushed back to begin late 2021 with a completion date to be confirmed!

Site A35 FWA/TFM is highly unlikely to make any contribution to the five year supply.

Attached documents:

Comment: MM23 - LPMM18/3332  Respondent: Mr Glen Travers 8920865  Agent:

MM23 D1

Removal of sustainability expectations

The important expectations on developments of 25 dwellings or more in D1(2) are removed without any justification. The submitted text provided a series of requirements which met the social dimension of sustainable development in national policy. As submitted, the text is sound and so cannot be changed at this stage.

The replacement text is less precise, for example, on community interaction, walking distances, active lifestyles, routes to nearby areas for pedestrians and cyclists.

MM23 D1 para13- 15

Masterplan for Former Wisley Airfield (FWA/TFM)

The masterplans proposed suffer from two main defects:

(i) They are produced by and approved by the developer. They do not have the status of supplementary planning documents or other local development documents and are not approved by the local planning authority. If the Council does not agree with them, it can do nothing. Notwithstanding that, para 17 requires planning applications to be consistent
with the masterplans, so in those respects is determining the acceptability of the developer’s own application on its compliance with the developer’s own masterplan. That is allowing the developer to mark his own homework.

Developers can get master planning very badly wrong, as the FWA/TFM appeal decision demonstrated.

(ii) The masterplans are required to respond to very vague criteria in para 16. Those are much less precise and useful than the expectations in the submitted D1(2). Almost any scheme could, in a developer’s eyes, meet para 16, even if it was a failure.

37 D4

Deletion

The submitted policy D4 is sound and there is no rational basis upon which it could be unsound. No amendment is therefore justified.

Whilst some elements are incorporated into the main modifications for D1, other details such as (1)(d) ‘e street patterns, spaces around buildings, layout, grain, scale, massing, proportions, height and materials of surrounding buildings’ are omitted from the proposed text.

**Attached documents:**

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**Comment:** MM40 - LPMM18/3333  **Respondent:** Mr Glen Travers 8920865  **Agent:**

Site Specific A35 FWA/TFM

53 MM40

Quality requirements for FWA

Apart from the wastewater requirements, the changes lack any rationale or benefit. The condition of the SNCI will be inevitably compromised by the development itself. Moving references to unique places and unique context from opportunities to requirements is no doubt intended to strength the expectations but involves turning a very vague expectation into a similarly vague requirement.

**Attached documents:**

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**Comment:** MM50 - LPMM18/3334  **Respondent:** Mr Glen Travers 8920865  **Agent:**

60 MM47

Map Amending SNCI Former Wisley Airfield/Three Farm Meadows (FWA/TFM)

The amendment drastically reduces the size of the site of nature conservation importance at the FWA/TFM. However, the ecological interest of the land still merits SNCI designation. The published SNCI designation is sound and there is no justification for changing it.

The change appears to be to facilitate the new settlement. However, SNCI designation depends upon the merits of the land rather than desires to develop it. Policy ID4(6) sets out the test to be applied to weigh any benefits of a scheme
against the harm to a SNCI. It is not there to be bypassed by the removal of SNCI designations because land is allocated for development or SANG.

- The addition of land to the south of FWA/TFM does not mitigate the density issue with the site as much of the new land is constrained by the VOR which prevents construction within a certain radius. There is currently no set date by the CAA for this aviation beacon to move.
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

I trust you take into considerations the objections highlighted in my letter as the soundness of your Local Plan depend on you satisfactorily addressing these issues. In particular site A35 should be removed from the draft Local Plan to deal with the issues raised.

Attached documents:

Comment: MM9 - LPMM18/3331  
Respondent: Mr Glen Travers 8920865  
Agent:

The modification is a weakening of the protection of the countryside, changing the site being ‘as a matter of fact within the village’ to ‘should be considered to be’. The new text has a prospective element to it – how the village ought in the future to be perceived rather than how it presently is.

In the context of a very diffused settlement such as Ockham, it is difficult to identify what is within the village at present, let alone what should be considered to be. The proposed modification would bring an uncertain, but potentially large, area into possible ‘infill’ development.

The Sustainability Appraisal Report Addendum asserts that there is ‘a considerable re-write of the policy; however, this is presentational, i.e. there is no change in policy approach’ (para 9.11.3). Firstly, there is a change in the policy and either way the current text is not unsound. A presentational re-write cannot be addressing a failure of a plan to be sound.

Attached documents:

Comment: MM40 - LPMM18/3465  
Respondent: William Logan 8921153  
Agent:

Please focus your development on Wisley Airfield as its an open semi developed site which is no longer an area of natural beauty.

Attached documents:

Comment: MM2 - LPMM18/5401  
Respondent: Claire Kukielska 8921857  
Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation
I would like you to note my following comments: A. I fully endorse the responses of The Clandon Society, the Guildford Residents' Association and the Guildford Vision Group and would like their responses to be registered as mine as well. B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because: 1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited. 2. There is too much reliance on A3 improvements and these are beyond the council’s control. 3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit. 4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’. C. I would like the Inspector to RE-EXAMINE the Local Plan because: 1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt. 2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high. In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road. The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g., through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247. I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents. What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge. The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic. 2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A2473. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh. 4. The development of 1800 houses at Gosden Hill. 5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A2476. The conversion of the Burnt Common roundabout to an all-ways junction with the A37. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go
due south of Guildford to use the A247 - potentially an easier route than any existing. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are: 1. The junction with the current A3 south-bound slip road (modifications are underway) 2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph. 3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station. 4. The sight lines for the exit of the Onslow Arms car park. 5. The narrowness of the road near Summers. 6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement. 7. The sharp bend near Clandon Regis. 8. The narrowness of the road at the Bull’s Head. 9. The Clandon Junior School and the, in places, narrow footpath for children walking to school. 10. The sharp bend with poor sight lines in either direction at the church. 11. No continuous footpath through the length of the village. 12. The speed of traffic. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker. The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority. In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation. The Plan is unsound and should be re-examined.

**Attached documents:**

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MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

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1. **The Guildford Vision Group’s Objections and Concerns Which I Share**
MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment</th>
<th>MM31 - LPMM18/5407</th>
<th>Respondent: Claire Kukielka 8921857</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development. MM31 A height limit for North Street is required. MM31 There appears to be no allocation for an all-direction bus interchange.</td>
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<tr>
<th>Comment</th>
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<th>Respondent: Claire Kukielka 8921857</th>
<th>Agent:</th>
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<tr>
<td>MM32 A height limit for White Lion Walk is required.</td>
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<tbody>
<tr>
<td>MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.</td>
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<th>Comment</th>
<th>MM35 - LPMM18/5410</th>
<th>Respondent: Claire Kukielka 8921857</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.</td>
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<td><strong>Attached documents:</strong></td>
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MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/5411 **Respondent:** Claire Kukielka 8921857  **Agent:**

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment:** MM44 - LPMM18/5412 **Respondent:** Claire Kukielka 8921857  **Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment:** MM9 - LPMM18/5404 **Respondent:** Claire Kukielka 8921857  **Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM27 - LPMM18/3870 **Respondent:** Claire Bridges 8923905  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.
Currently buses run one an hour to Woking and so people are forced to use cars.

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<tr>
<th>Comment: MM41 - LPMM18/3868</th>
<th><strong>Respondent:</strong> Claire Bridges 8923905</th>
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<tr>
<td><strong>MM41 Land at Garlicks Arch, Send Marsh, Policy A43</strong></td>
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**I Object** to the proposal to increase the number of homes on this site from 400 to 550.

Anyone who has actually visited the site will see how unsuitable it is.

I object to the number of homes being increased by 37%. With an average of 2 people per house this will mean a possible 1000 plus residents who will all require access to roads and amenities.

I went to the hearing about this site and listened to the overwhelming and compelling evidence presented by various groups about how unsuitable this site was. The council’s representatives had few answers to this and so the conclusion from the Inspector that the site should be increased and not scrapped is incomprehensible.

It is likely this will add over 750 additional cars to the traffic in the surrounding area. Access to both Guildford and Woking would add to the massive traffic jams at present at Send Dip and the Burnt Common Roundabout. Send Road is already the main access road between Woking and the M25 carrying heavy goods vehicles and articulated trucks.

There is nothing in the Local Plan about additional road infrastructure so the current small roads we currently have which are over-crowded already will simply not be able to cope. If the other proposed sites all go forward then these roads will simply gridlock making life a misery for everyone concerned. There is a serious safety angle to this problem as cars bunch and speed limits are broken to enable to get from A to B on time. The situation will be far worse during weekdays. The additional traffic that will result from the excessive building programme in Send will make the situation far worse and in all probability result in gridlock.

With the additional houses there will inevitably be families requiring schools for their children. There is only now one primary school for the villages of Send and Ripley since the recent closure of Ripley School. George Abbot is the nearest secondary school and for many years the children of Send and Ripley do not get into the school due to it being over-subscribed. The next nearest school is the Howard of Effingham which currently does not take children from the villages.

There are no plans to build any new schools, surgeries, dentists or amenities.

More houses will mean the current amenities will be over stretched and unable to cope.

In my opinion this is an irresponsible and ill-conceived site to choose.

**Attached documents:**

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<tr>
<th>Comment: MM41 - LPMM18/3872</th>
<th><strong>Respondent:</strong> Claire Bridges 8923905</th>
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<td><strong>MM27 MM41 MM42 and MM48 Transport Strategy</strong></td>
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GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

**Attached documents:**

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**Comment:** MM42 - LPMM18/3859  **Respondent:** Claire Bridges 8923905  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

**Attached documents:**

---

**Comment:** MM42 - LPMM18/3900  **Respondent:** Claire Bridges 8923905  **Agent:**

**MM42 Land at Burnt Common, London Road Send, Policy A58**

I object at the proposal now to double the original area proposed especially in view of the increased capacity at the Send Business Centre and the spare capacity at Slyfield. This will also generate additional traffic consisting of vans and larger vehicles which will all travel through the narrow and already busy roads of Send and Ripley. This will add to further congestion and noise and air pollution.

It will bring safety concerns for local residents and pedestrians in the village who will be using the local recreation ground and need to cross the road.

It will be better to centralise and develop Slyfield Industrial Estate where there is already existing infrastructure and spare capacity.

**Attached documents:**
**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

I object to the proposal for 120 homes at this location which is a wholly unsuitable development in such an area and for the same reasons as the other locations in Send namely excessive pressure on local services and additional traffic on a road system which was never intended for such potential traffic volumes.

The only way in and out of this site is through Send Marsh Road which is unsuitable to carry this amount of extra traffic generated by this many houses. Access either end, at Send Dip and Mays Corner onto Send Road is already very difficult due to the congestion through Send and Ripley and the result will be long traffic jams along Send Marsh Road.

This is prime green belt land and there is no reason to make an exception for housing here when there are other areas outside of the greenbelt or on brownfield sites. GBC do not have any explanation as to the reason for the exception to put this land on greenbelt land for this site.

This is not acceptable.

Attached documents:

---

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

Attached documents:

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**MM9 Green Belt Policy**

This can hardly claim to be a policy when the above developments all impinge on the existing Green Belt which GBC seem prepared to sacrifice. Following GBC’s logic, all greenbelt land can be sacrificed and therefore is able to be built on. This breaches all GBC’s own policies and government directives.

Attached documents:
I completely fail to understand why it is necessary to comment again on these sites.

GBC do not appear to be following a democratic process. There have been over 7000 objections from Send and Ripley and this is a phenomenally clear message to say GBC have got it wrong. Now we are effectively gagged and can only comment on modifications to proposals that appear to be presented as a ‘done deal’.

I do not feel both my own and those of the many residents I know who all share the same feeling are being listened to and each time a plan is presented it is modified to an even more concentrated plan.

We in Send have expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before.

The opening paragraph to the local plan states

“Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough’s most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, supported by suitable infrastructure including education, healthcare and transport. The new Local Plan will be in place until 2034.”

Furthermore there are signs at various points around the area proclaiming

“The Surrey Hills an area of Outstanding Natural Beauty.”

I am very disappointed with the way the Guildford Plan has been presented and the complete lack of listening to resident’s views.

Lessons from the previous plans have clearly not been learnt and one has to question the logic of the proposers thinking and how completely unsupported and illogical plans can have reached this stage. One also has to question whether anyone from GBC has ever driven or walked around Send and Send Marsh. One journey, particularly during rush hour would have demonstrated how ridiculous and unreasonable these plans are.

Furthermore, GBC’s decision to present these modified plans completely disregards the 7000 objections already raised to the proposals. If that volume of valid and justified objections does not cause GBC to see that the proposals are completely inappropriate and unsuitable for the area then I fail to see what will and question what other motivations may be behind the plans.

In conclusion, the continual disregard of local public opinion is very disappointing and GBC needs to revisit the original proposals and Main Modifications now put forward to create a significantly better and more appropriate plan than this one for the area we live in.

Attached documents:
MM23 - Policy D1  GBC as a major landowner in the town centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

Attached documents:

Comment: MM32 - LPMM18/5044  Respondent: J.M. Judge 8924737  Agent:

MM32 - Policy A60 - White Lion Walk - Any re-development of this site should have a maximum height limit of 4 storeys and the design to be appropriate for the Conservation Area and 'Historic Core'.

Attached documents:

Comment: MM41 - LPMM18/5041  Respondent: J.M. Judge 8924737  Agent:

MM3 - Policy S3.  GBC must deliver real and co-ordinated results. The Town Centre must be designated a strategic site or sites.

...  

MM3 - Policy S3 Guildford must have an effective local plan. Development Rules must ensure quality development across the Town Centre.

...

MM3 - Policy S3 GBC should adopt Guildford Vision Group's proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM6 - LPMM18/5043  Respondent: J.M. Judge 8924737  Agent:

MM6 - Policy H2 - Affordable Homes - Should be allocated in all Town Centre developments to ensure a mixed community in the centre of Guildford.

Attached documents:

Comment: MM13 - LPMM18/4427  Respondent: Annie Cross 8926529  Agent:

MM13 - Retail Needs
GBC are out of step with the rest of the UK by burying their heads in the sand and not acknowledging the effect online shopping is having on retail. House of Fraser and Debenhams in Guildford are under threat and there are numerous vacant shops in Guildford town, including the recently modernised Tungsgate. Even the department stores in Oxford Street are recognising traditional retail is reducing and are looking at other means of using their upper floors to bring in customers. Guildford could use any redundant department store upper floors for housing.

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/4424</th>
<th>Respondent: Annie Cross 8926529</th>
<th>Agent:</th>
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</table>

I wish to register my OBJECTIONS to aspects of thee GBC Local Plan Main Modifications, as shown below:

**MM2 - Housing Numbers / SHMA**

The ONS has very recently released new Housing Formations Rates which reduce Guildford's projected housing need to 301 dwellings p.a., less than half of the current draft GBC LP figure of 630 +/-, which rises to 671± when including Woking's unmet housing need. This Guildford LP figure is now totally wrong and it would be illogical, and immoral, not to completely revise the GBC draft LP to take account of the new housing need figures. This reduction of over 50% allows GBC to review its previously developed land sites in sustainable locations and remove the "exception circumstances" for irretrievable removal of large sites from the Greenbelt.

**MM2 - Delivery of Development and Regeneration of Guildford Town**

Guildford is not showing initiative in potential housing sites in its sustainable town centre, which has many employment opportunities. It has a large number of surface car parks which could easily accommodate 2-3 storey buildings above. The recently opened (2017?) Waitrose, in the very centre of Guildford, included a large surface car park - and nothing above! A quick look at Google Maps clearly shows the numerous town centre surface car parks, together with Ladymead and the Research Park, only the latter perhaps requiring car use.

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<th>Comment: MM23 - LPMM18/4428</th>
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MM23 - Sustainability + Policy D4

Guildford should be promoting sustainability, thereby providing specific sustainability requirements, not reducing the requirements. A perfect example is the former Wisley Airfield, a site that will have high car usage and currently does not offer good, public, transport.

Any site of 25+ homes must have a clear and positive policy on infrastructure, street patterns and spacial awareness of density, proportions, height and materials. Excluding these give developers free rein, particularly on Greenbelt sites. Include these very important guidelines.

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<th>Comment: MM3 - LPMM18/4425</th>
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</table>
S3 - Town Infrastructure

These policies need to be revised to provide good, improved, infrastructure in Guildford town centre, which would facilitate further development of homes in sustainable locations.

Attached documents:

Comment: MM41 - LPMM18/4429  Respondent: Annie Cross 8926529  Agent:

MM41 - Garlicks Arch

An increase to 550 homes in an area that floods and is in Greenbelt will increase traffic by at least 1,000 cars as most homes have an average of 2 cars. The area is not well served by public transport and car usage is inevitable. This will have an affect on the local roads and the nearby villages of Ripley and Send, the former already subject to over European limit pollution and both with severe parking issues.

Further detailed traffic modelling is required which does not rely on the A3 and other SRN's which beyond GBC control.

Attached documents:

Comment: MM42 - LPMM18/4430  Respondent: Annie Cross 8926529  Agent:

MM42 - Burnt Common

Shortly after the GBC Public Inquiry, this proposed employment site was doubled from 7,000 sq m to 14,000+ sq m. This site could provide an employment area, but proportionate to the character of the surrounding area as it is Greenbelt land. Public transport is poor at this site and car usage is inevitable.

Attached documents:

Comment: MM43 - LPMM18/4431  Respondent: Annie Cross 8926529  Agent:

MM43 - Transport Strategy

This does not reflect the reality of proposed future traffic in the north eastern part of the borough.

The increase in homes in Ripley, Ockham and Wisley will triple if sites A35 and the Ripley portion of site A43 go ahead, i.e. from 1,189* (2016 figures) homes to 3,489 +/- houses. The Send portion of the site is expected to have a further 350 dwellings. With an average 2 people per household on A35 and A43 (Ripley portion), the population would be 4,612 +/-. an increase of 184% +/-.

Both sites are in Greenbelt. Site A35 has virtually no public transport facilities and the GBC draft 2017 LP removed the requirement for a bus service to Woking town and its station, with fast trains to London Waterloo. Site A43 has poor
public transport facilities. With approximately 2 cars per household, the proposed 2,100+ dwellings at site A35 and a total of 550 at Garlicks Arch, would give an extra 5,300+/- cars.

The 'solution' of slip roads onto the A3 at Burnt Common will be catastrophic for Ripley village. Paid for by the site A35 owners, it will bring traffic from site A35, plus a proportion of the increased Royal Horticultural Society membership (targeted to increase from 1m to 1.4m in the next few years), through Ripley village to access the A3 southbound. Garlicks Arch and Burnt Common traffic will drive through Ripley Village to access the A3 northbound and M25. This 'solution' needs to be revised.

Site A58 is unlikely to employ all locals who can walk or cycle to work, but will add to the increase in cars.

Attached documents:

Comment: MM44 - LPMM18/4433  Respondent: Annie Cross 8926529  Agent:

**MM44 - Aldertons Farm**

A further 120 dwellings will add to the above increase in traffic and air pollution problems.

Attached documents:

Comment: MM50 - LPMM18/4434  Respondent: Annie Cross 8926529  Agent:

**MM47 - former Wisley airfield SNCI**

Site A35 is situated alongside areas of SPA and SSSI. It's contribution as an SNCI is a natural fit for land in the middle of Greenbelt, situated to the adjoining designations. It should remain as SNCI as there are no "exceptional circumstances" for site A35 to be removed from the Greenbelt and doing so to allow construction must have an effect on the adjoining SPA and SSSI.

In conclusion, the updated ONS figures **must** be taken into account and the whole GBC draft Local Plan revised accordingly. It should make use of the sustainable town centre sites and avoid irretrievable removing large areas from the Greenbelt, in accordance with NPPF requirements.

Attached documents:

Comment: MM9 - LPMM18/4426  Respondent: Annie Cross 8926529  Agent:

**MM9 - Green Belt + Limited Infilling in Ockham**

I object to GBC narrow-mindedness on its land use policies (see MM2 above) and unnecessarily removing large, unsustainable, sites from the Greenbelt.
Whilst Guildford are contributing to Woking's unmet housing need, Woking have a policy of not building in Greenbelt. Guildford should protect their Greenbelt instead of providing housing for a borough who will not use their Greenbelt, this is illogical.

The new housing numbers and a review of sustainable sites should not require 5,400± homes in the Greenbelt.

The village of Ockham comprises a necklace of 8 scattered hamlets. I object to a policy which proposes 'infilling' unless clearly stated infilling must be within those hamlet boundaries.

**Attached documents:**

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**Comment: MM45 - LPMM18/3229  Respondent: Samantha Marchant 8927105  Agent:**

I am writing with regards to the public consultation on the ‘Main Modifications’ to the local plan. In particular with reference to MM45 policy A64.

I am against the proposed site, A64, for 105 houses on Greenbelt in Flexford for a number of different reasons, as outlined below, I would like these to be considered as you review the plan.

- It is unclear what the exceptional circumstances are to develop red-rated Greenbelt land that has been previously discounted as suitable for development.
- The sustainability assessment that accompanies the proposed site outlines that of all the sites proposed Flexford is the smallest and most rural. The proposal does not include improvements or additions to existing infrastructure or services.
- It is difficult to understand how an additional 105 homes will generate economic growth to Flexford. There are no existing facilities in Flexford, therefore it is impossible to identify any particular opportunities for the rural economy.
- With regards to Flooding, Flexford being former flax fields, has considerable surface water and suffers from flooding.
- In reference to Biodiversity, the site is situated very close to the Thames Basin Heaths Special Protection Area.
- The proposed development will have an adverse effect on the rural character of the village. It will also impact the view from the Hogs Back in the AONB.

**Attached documents:**

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**Comment: MM2 - LPMM18/5325  Respondent: P. Richardson 8928033  Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share
MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/5328  Respondent: P. Richardson 8928033  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/5326  Respondent: P. Richardson 8928033  Agent:
MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5329  Respondent: P. Richardson 8928033  Agent:

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5330  Respondent: P. Richardson 8928033  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5331  Respondent: P. Richardson 8928033  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>MM35 <strong>Gosden Hill Farm</strong> should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development. MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm. MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable</td>
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<tbody>
<tr>
<td>MM41 <strong>Garlick’s Arch</strong> should be retained as Green Belt in view of the revised housing need, rather than expanded</td>
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<tr>
<td>MM44 The new Green Belt site at <strong>Send</strong> is not justified in view of the revised housing figures.</td>
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<tr>
<td>MM9 In Green Belt, proposed limited <strong>infilling outside identified settlement</strong> boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
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<th>Comment: MM12 - LPMM18/1512</th>
<th>Respondent: Sue Reeve 8928961</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>1. MM12 SANGS AND SPAS OBJECTIONS</strong></td>
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<tr>
<td>• Policy paragraph 3(d) states that “Large developments may be required to provide bespoke SANG.” This sentence is insufficiently prescriptive for a planning Policy, and fails to meet the requirements of NPPF</td>
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</table>
paragraph 154, which states that “Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the Plan.” The strongest statements of all must be used in order that developers cannot excuse their way out of commitments to provide proper SANGs. The proposed change in the text should be reversed.

• The proposed change in Policy paragraph 4 has the effect of providing a potential waiver regarding the provisions of the other clauses of this Policy and the Thames Basin Heaths SPA Avoidance Strategy. The correct way to achieve that would be to amend the Avoidance Strategy itself (although that itself would be contentious and probably unacceptable). Having an Avoidance Strategy, and also having ad hoc waivers that appear in different documents is unacceptable.

• The last sentence of paragraph 4.3.50c of the reasoned justification, states that “If these residential developments provide or contribute to appropriate SANG and SAMM measures in accordance with the Thames Basin Heaths Special Protection Area Avoidance Strategy (the strategy), it is likely that it can be concluded that no adverse effects on the integrity of the SPA will occur; in the planning application for the former Wisley airfield the SANG proposals were apparently regarded as acceptable despite encouraging dog walkers towards the SPA.

Attached documents:

Comment: MM2 - LPMM18/1505  Respondent: Sue Reeve 8928961   Agent:

1. NUMBER OF HOUSES (MM2) – MAJOR OBJECTIONS

• Since the release of the draft Local Plan in December 2017 and the release of the present draft, which includes Main Modifications arising from the Inspectors examination in June 2018, the nominal housing target in the Plan has increased by 174 dwellings (1.4%) from a total of 12,426 to 12,600 over the entire 20-year Plan period from 2015 to 2034 inclusive. This is unreasonable when in May the ONS released predicted population projections far lower than previously thought.

• Yet on 20th September the Office of National Statistics (ONS) released new household growth projections for Guildford for the Plan period of 2015 to 2034. The new figures reduced the projected growth in households from 11,142 (that applied to the previous version of the Plan) to 6,635; a reduction of 4,507 households (40.5% reduction). This change was no surprise; in May 2018 ONS had already released their population projections that clearly anticipated a substantial drop in the household projection. Why on earth did the Council not take this into consideration and reduce their numbers?

• The inclusion in Policy S2 of an annual housing increment of 42 dwellings per year between 2019 and 2034 to support part of Woking’s unmet need is flawed and unsound. In addition to the 40% projected reduction in household numbers for Guildford that were recently published, a similar situation applies to the Woking household projections. Woking’s predicted household growth between 2015 and 2034 sees a reduction nearly 3000 homes (a drop of 48%). This too was indicated in the May 2018 release of predictions by the ONS and confirmed in September. It was therefore obvious that Guildford would not need to cater for Woking’s apparent unmet need. Yet an additional 42 houses per year (totalling 672 in the Plan period) were added to the draft Local Plan.

• At his examination of the previous version of the Local Plan in June/July this year, the Planning Inspector required the profile of house building to be biased towards the early part of the Plan period in order to improve the affordability of housing in Guildford borough. In response the Council added a further five sites totalling 655 new dwellings:

  • Garlick’s Arch, Send Marsh (Site A43, MM41) 150 and addition to a large site in the Green Belt
  • Aaron’s Hill, Godalming (Site A61, MM??) 200 a green field site (outside the Green Belt zone)
Hornhatch Farm, Chilworth (Site A62, MM??) 80 a Green Belt site
Alderton’s Farm, Send Marsh (Site A63, MM??) 120 a Green Belt site
Strawberry Farm, Flexford (Site A64, MM??) 105 a Green Belt site

A reduction of 4,507 dwellings is equivalent to well over two “strategic sites” plus more. So removal of the above sites from the plan (excluding the 150 additional houses at Garlick’s Arch as these are counted in figures below) would result in 505 fewer houses.

Removal of the following sites:

- Wisley airfield (Site A35, MM40) 2,000 (a site already rejected by the Secretary of State)
- Blackwell Farm (Site A26, MM36) 1,800
- Garlick’s Arch, Send Marsh (Site A43, MM41) 550 (an increase of 150 from the previous draft)

would result in a further reduction of 4350 households – totalling 4855 (4350+505). This is greater than the 4507 households reduction that he ONS have recently specified. However is mitigated by not needing the additional increment for Woking’s unmet need of 672 homes. So 4855 less 672 is 3183 houses.

- The Local Plan states that “more housing is likely to come forward over the plan period” (“Reasoned Justification”, paragraph 4.1.21). No account has been taken of this to reduce the housing numbers in the plan period. So this gives even more scope for reducing the planned building number for households in the Plan period of 2019-2034.

- One of the major concerns, in particular, creating large strategic sites is acknowledged to be the effect of traffic in the immediate area and on the major roads to which they all adjoin. This could be hugely mitigated by removing at least two of these strategic sites. The transport strategy (MM41) takes no account of the delay in Junction 10 modifications and this will hugely impact sites which depend on this scheme. Neither does the additional housing in the Send Ripley area (Garlick’s Arch, Alderton’s Farm) properly consider the impact on the Portsmouth Road through Ripley.

- Additionally, since the Inspector’s examination, the primary school in Ripley has closed and therefore development in this area (Ripley, Send, Wisley) becomes even more unsustainable.

This increase in the planned number of houses was introduced at a time when a clear signal of the 40% drop in projected households was already apparent and moreover all are on Green Belt or green field sites. Yet more erosion of our precious open land. These additional sites should be removed from the Plan. In addition a major review of all Green Belt sites in the Plan should therefore be undertaken to align the planned level of housing delivery with the up-to-date household figures and the need for other factors (such as not needing to consider Woking’s unmet need as this doesn’t exist any more) to be taken into account. All these totals exclude trend based housing supply (windfall and rural exception) as well as completions and permissions, whether allocated or not. These numbers should also be included in the Plan and thus reduce the number of houses to be built in the Plan period.

Given the very large discrepancies between the levels of housing proposed in the Plan and the ONS household data released on 20th September 2018 (which greatly reduces the housing requirement in Guildford and Woking), and the exclusion of windfall numbers, the comments made by Highways England about traffic issues in the A3/ M25 area the Public Examination of the Plan by the Planning Inspector must be re-opened.

Attached documents:

Comment: MM2 - LPMM18/1521  Respondent: Sue Reeve 8928961  Agent:
Given the very large discrepancies between the levels of housing proposed in the Plan and the ONS household data released on 20th September 2018 (which greatly reduces the housing requirement in Guildford and Woking), and the exclusion of windfall numbers, the Public Examination of the Plan by the Planning Inspector must be re-opened.

Attached documents:

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**Comment: MM23 - LPMM18/1516**  
**Respondent:** Sue Reeve 8928961  
**Agent:**

1. POLICY D1 & D2: SUSTAINABLE DESIGN, CONSTRUCTION AND ENERGY

**MM23 OBJECTION**

- This policy waters down the requirement for sustainability (walking distances and cycle routes). This makes it easier for developers to ignore these very important considerations.

Attached documents:

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**Comment: MM24 - LPMM18/1517**  
**Respondent:** Sue Reeve 8928961  
**Agent:**

**MM24 – OBJECTION**

- Policy paragraphs 4, 5, 6 and 7 are good in their intent, but there will be many development sites in the borough where there is no neighbouring (C)CHP scheme, or where the scale of the development is too small to justify a new scheme. In these cases, the Policy should give explicit encouragement to the consideration of ground-source or air-source heat pump solutions, which are likely to be the most energy efficient of all heating schemes.

The intent of Policy paragraph 9 is generally welcomed, but it is not sufficiently ambitious to meet the current climate change threat (see the IPCC’s report “Global Warming of 1.5 °C” published on 6th October 2018, eg. paragraph C2: “Pathways limiting global warming to 1.5°C with no or limited overshoot would require rapid and far-reaching transitions in energy, land, urban and infrastructure (including transport and buildings), and industrial systems. These systems transitions are unprecedented in terms of scale, but not necessarily in terms of speed, and imply deep emissions reductions in all sectors, a wide portfolio of mitigation options and a significant upscaling of investments in those options”). This Local Plan will be in place until 2034, and – while they might sound substantial – the proposed carbon emission reductions of 20% will not be sufficient to effectively address this serious global problem. Guildford must lead the way for other Councils to adopt forward thinking and essential sustainable development of all new building

Attached documents:

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**Comment: MM26 - LPMM18/1518**  
**Respondent:** Sue Reeve 8928961  
**Agent:**

**MM26 – OBJECTION**

- Policy paragraph 5a states “Where an applicant advises that their development is unviable with the Policy and infrastructure requirements, the Council will consider whether these costs were taken into account in the price
paid for the site (or any agreement to purchase the site). If these costs were taken into account, as is required by
the Council, but there are higher costs associated with the site that were unknown at this time, then the Council
will take this factor into account when considering the viability and acceptability of the proposal”. In essence,
this paragraph provides developers with a device that insulates their profits from normal business risk. I am not
aware of any other businesses that are indemnified against errors in their investment decisions and in their risk
management procedures in this way. This is completely unacceptable and deserves no place in Guildford’s Local
Plan. Developers must not be given any opportunity to circumvent Guildford’s requirements for their own profit
or lack of it.

Attached documents:

Comment: MM3 - LPMM18/1507  Respondent: Sue Reeve 8928961  Agent:

1. NEW POLICY S3 ON THE TOWN CENTRE (MM3)

The version of the Local Plan being consulted on includes a new policy on the town centre (Policy S3). I make the
following comments and objections

- The town centre is universally acknowledged (including by the Council) to be the largest and most sustainable
  location in the Borough, but as currently drafted Policy S3 is wordy, general and imprecise, and fails to
  specify concrete in terms of what is planned for the town, whereabouts it is planned, or when it is proposed
  that it should happen.

- A town centre policy is necessary, but the current draft falls well short of the requirement.

- At the Examination in Public in June 2018, the planning inspector stated that the town centre plans lacked a
  policy and strongly indicated that there should be significantly more housing provided in the town centre (agreed
to be the most sustainable location of all) and questioned the amount of retail over-provision outlined in the
  previous Local Plan, given the reducing trends of town centre retail needs. None of this has been addressed in
  any concrete way.

Given the lack of solid policy on town centre redevelopment which should include a much higher number of
households, the policy must be revised and the Public Examination of the Plan by the Planning Inspector must be
re-opened.

Attached documents:

Comment: MM40 - LPMM18/1514  Respondent: Sue Reeve 8928961  Agent:

1. Policy A35: FORMER WISLEY AIRFIELD (MM40) OBJECTION

- On 13th June 2018 the Secretary of State published his decision to uphold the Councils’ decision to refuse
  permission for the Wisley Airfield planning application (15/P/00012), and the applicant’s planning appeal was
  dismissed. Yet three months later the Local Plan (including Policy A35 for a development of essentially the
  same scale on Wisley Airfield as that rejected by the Secretary of State) was submitted for the present public
  consultation. This seems very odd at a time when the official household projections on which the Local Plan
  was based had been reduced by 40%
In the Requirements section of this Policy, paragraph 10(a) states that “Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.” However, in all previous versions of the Plan the area designated as a Site of Nature Conservation Importance (SNCI) covered the entire proposed development site, whereas the current Plan shows the area of the SNCI as being only about 15 – 20% of its earlier size. Moreover about a third of that remaining area of the SNCI includes a zone that is “safeguarded land for waste” (covered in the Surrey Waste Plan), so the net effect has been to emasculate what was formerly a substantial area of protected countryside, while stating that “every effort must be made to reduce the harm …”. This is completely contradictory. It is outrageous that the area is reduced.

The additional new land to the south of the site does not mitigate the density problems on Three Farms meadows as development on much of that land will be constrained by the presence of the VOR beacon.

The additional new land to the south of the site abuts the Ockham conservation area and increases the visibility of the site form the AONB.

Attached documents:

1. POLICY P2: GREEN BELT (MM9) OBJECTIONS

This Policy has been almost completely redrafted, but takes no account of the large reduction in projected households (see above). 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt. Yet, given the reduced housing projections from ONS, and the apparent likelihood of additional housing during the period of the Plan, the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist, especially when 66% of the development is proposed on land that is currently in the Green Belt.

Also given the huge reduction in housing requirement as a result of the most recent ONS figures, there should be no need at all to inset villages within the Borough. They should all remain part of the Green Belt.

The Public Examination of the Plan by the Planning Inspector must be re-opened, to examine the unnecessary use of the Green Belt.

Attached documents:

Comment: Other comments - LPMM18/1519  Respondent: Sue Reeve 8928961  Agent:

1. CONCLUSION

It is very clear from chatting to local people that many are completely unaware of the current consultation that is taking place. These are people who responded to the previous consultation. I think it is very important that the consultation period be extended and an extended effort to alert at the very least, all those who responded to the last consultation. I am one of the people who had not been alerted to this activity. I understand that GDPR (or lack of signing up to it for the Council) has been cited as a reason for alerting a subset of previous respondees. I don’t remember whether I was asked to do so and clearly haven’t as I don’t get any alerts. However SCC find no problem in continuing to send correspondence about local planning matters and I haven’t signed a GDPR statement for them.
It has been suggested that Conservative policy on housing is to flood the market with available housing and in doing so hopefully reduce house prices. I would hope that Guildford is working on behalf of its residents and not Conservative policy, there is no place for party politics in local communities. Also it wouldn’t work in our area – house prices are consistently high.

Attached documents:

**Comment:** MM23 - LPMM18/435  **Respondent:** East Horsley Parish Council (Nick Clemens) 8929057  **Agent:**

3. POLICY D1 Place Shaping

Proposed Modification MM23 significantly revises the Place Shaping policy D1 of the Local Plan. EHPC supports many of the revisions now proposed, in particular Paragraph 6 addressing distinct local character which states that:

“All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patters of development, including landscape setting.”

EHPC fully endorses and supports this policy. However, it is then immediately followed in Paragraph 7 by an entirely new policy, as follows:

“Given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct patters of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.”

A consequence of Paragraph 7 is to effectively nullify the policy set out in Paragraph 6 for all of the strategic sites within the local plan. In our opinion this is inconsistent and illogical. Moreover, since the strategic sites are all located in picturesque Green Belt locations close to existing settlements, it is precisely these sorts of places where Paragraph 6 assumes its most importance. We believe that it is very important to ensure large new developments are in keeping with the character of their local areas – as Paragraph 6 sets out. Paragraph 7 is effectively giving a licence to developers to ignore Paragraph 6 and to propose whatever form of mass urban housing they believe is most cost effective, irrespective of its impact on the overall character of the local area.

The importance of this matter was well illustrated by comments made by the appeal inspector at one of the strategic sites, the former Wisley airfield, following the 2017 planning appeal. In refusing planning permission, the Secretary of State commented in his report (Paragraph 27):

“....although some of the harmful impacts on the appearance of the area could be partially mitigated by extensive landscaping, this would not disguise the basic fact that a new settlement in a rural area would, inevitably, cause substantial harm to both its character and its appearance.”

The appeal inspector, Mr Clive Hughes, provided rather more graphic detail in his report when he commented (Paragraph 20.95) that:

“....the overall impact would result in substantial harm to the character of the immediate area. Being sited at the very heart of Ockham parish it would, in effect, link all the surrounding hamlets. It would erode the historic pattern of development in the area to the detriment of the character of these settlements. It would fail to reflect or respect its immediate setting and I agree with the nearby residents that this impact would be catastrophic on their rural way of life.”

If MM23 Paragraph 7 of the revised local plan is included, as GBC propose, this fundamental harm, as identified by the Secretary of State and the appeal inspector, would have been over-ridden by this new local plan policy.

EHPC believes that MM23 paragraph 7 is both inconsistent and inappropriate. Accordingly, we OBJECT to MM23 Paragraph 7 and recommend that it be deleted from the local plan.
Concluding remarks

EHPC has provided GBC with many detailed comments at each stage of the public consultations held for the local plan, although to date none of our suggestions have been acted upon.

As set out in previous submissions EHPC believes the local plan to be defective. It fails to optimise development within the Guildford metropolitan area and instead proposes to build too many houses within the Green Belt, particularly in the eastern part of the borough.

The large majority of housing within this local plan will be built on land being removed from the Green Belt, the long term consequences of which will be a continuous urban development stretching beside the A3 from Guildford to the M25 and undermining the entire conception of the Metropolitan Green Belt.

This is not a vision, nor a local plan, which East Horsley parish council can support.

Appendices:
1. Examination Statement (extract). Part One: The insetting of East Horsley
2. EHPC hearing statement addressing the insetting of East Horsley

Appendix 1:

Examination statement by East Horsley parish council: The insetting of East Horsley

The following is an extract from the examination statement submitted by East Horsley parish council to the local plan examiner, Mr. Bore, on 8th May 2018.

1. PART ONE: The insetting of East Horsley

Matters & Issues: 9.6

1.1 In paragraph 9.6 of Matters & Issues the inspector asks: “Does the plan take a sound approach towards the insetting of various villages from the Green Belt?”

1.2 EHPC contends that, in the case of East Horsley, it does not. In particular the plan fails on each of the four tests for soundness indicated in the inspector’s Guidance Notes (ID-2, paragraph 4), as discussed in turn below.

Tests for soundness:

1.3 Is the policy positively-prepared? - based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

1.3.1 The objectively assessed housing needs of East Horsley were analysed for the East Horsley Neighbourhood Plan (“EHNP”) and are available in the Evidence Base document, Housing Needs Assessment, (see www.easthorsley.info). This assessment indicates a mean OAN for East Horsley of 170 homes over the period 2017 to 2033. Six sites are identified in GBC’s Land Availability Assessment (“LAA”) within East Horsley with an estimated capacity to deliver over 220 homes. The largest site of 100 homes is allocated in the plan (Site Policy A39) and four others are allocated in the EHNP. All six LAA sites fall within the expanded settlement area of the village as proposed in the plan and therefore could be developed irrespective of whether or not East Horsley is inset from the Green Belt.

1.3.2 During the period 2000-2015 windfall housing in East Horsley contributed 110 net new homes. With an increase in the East Horsley settlement area of 37% proposed in the plan, a further significant contribution from windfall housing is expected over the period to 2033. Together with the five allocated sites in the village, it is therefore highly likely that new housing delivery within the expanded settlement area will significantly exceed the OAN of 170 homes over the life of the plan.
1.3.3 Accordingly, the objectively assessed housing needs of East Horsley are highly likely to be satisfied under the current ‘washed over’ Green Belt planning regime, implying that insetting is unnecessary for the long term sustainable development of the village. Being unnecessary, EHPC believes that this policy cannot be regarded as positively-prepared.

**1.4 Is the policy justified? - the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.**

1.4.1 The main justification in the plan for insetting is provided by the Green Belt & Countryside Study (‘GBCS’), prepared by Pegasus Planning Group (‘Pegasus’). Volume IV deals with the insetting of villages including East Horsley and contains detailed mapping of each inset village together with a descriptive narrative explaining their conclusions.

1.4.2 Pegasus assess the suitability of insetting of villages against three criteria:

**CRITERION 1: Does the majority of the village exhibit open character?**

**CRITERION 2: Do open areas within the village generally appear continuous with surrounding open land beyond the village?**

**CRITERION 3: Do the majority of the village edges exhibit incomplete, distinguishable boundaries that would not permit the provision of new Green Belt boundaries?**

The Pegasus Methodology states that: “...if the responses to the criteria were considered to be positive, positive, positive (+, +, +) then the village would not be considered appropriate for insetting within the Green Belt.”

1.4.3 Whilst EHPC does not dispute the general Pegasus methodology, we believe their detailed analyses contain many errors, which undermine their conclusions. In Appendix A to this Statement we provide detailed comments on these errors, supported by an independent mapping assessment conducted for EHPC by a professional mapping agency, Maps4planners.

1.4.4 EHPC asserts that East Horsley does make an important contribution to the openness of the Green Belt due to its distinctively open character, a consequence of the numerous large residential gardens to be found across the village settlement area. These represent the most dominant landscape feature of the village settlement area, a feature which Pegasus failed to recognise in their desk-based assessment of the open character of East Horsley. Specifically:

a) Pegasus characterise the East Horsley settlement area as being of Medium Density Development. However, as evidenced in the EHNP, East Horsley has an average housing density across the current settlement area of just 8.1 dph. On any reasonable interpretation this should be considered as Low Density Development, as discussed further in Appendix A, paragraphs A1.2.2 and A1.4.2;

b) Pegasus claim there are few open areas outside the settlement area which are visible from inside it. However, in Appendix A, paragraphs A1.3.1 to A1.3.3, we show that the majority of the settlement area (60.7%) is bordered by open spaces adjacent to the settlement area and visible from within it;

c) Pegasus claim the East Horsley settlement area is surrounded by “recognisable and defensible Green Belt boundaries”. However, such boundaries represent only a minority part (39.3%) of the current settlement boundary.

1.4.5 With positive responses against each of the three Pegasus criteria, the conclusion follows under the Pegasus methodology that East Horsley is not appropriate for insetting. The only alternative strategy available is not to inset East Horsley from the Green Belt. This is also the most logical approach given that this strategy satisfies both the objectively assessed housing needs of the village and will also preserve the openness of the Green Belt within this low density settlement area.

1.4.6 Pegasus has provided a Green Belt Purposes Assessment in Appendix 1 of their GBCS. Land parcels across the borough are classified on their Green Belt sensitivity according to how they meet the NPPF defined purposes of the Green Belt. The settlement area of East Horsley covers the three land parcels D6, D7 and C16 (*See our Appendix A1.6 below for further details*). The first two (D6 & D7), covering over 90% of the settlement area of East Horsley, are classified by Pegasus as *High Sensitivity Green Belt*. The third parcel, C16, covers the small Effingham Junction area of East Horsley and is classified as being Medium Sensitivity Green Belt.
1.4.7 Given that the large majority of the settlement area of East Horsley is classified by Pegasus as being High Sensitivity Green Belt, it is wholly inconsistent for them recommend that it should be inset from the Green Belt.

1.4.8 Since East Horsley meets the three Pegasus criteria for not insetting the settlement area and with a predominant Pegasus classification as High Sensitivity Green Belt, EHPC believes that the justification offered in the plan for the insetting of East Horsley must be considered unsound.

1.5 Is the policy effective? - deliverable over its period and based on effective joint working.

1.5.1 Whilst the authority to inset a settlement from the Green Belt is clearly available to GBC under the local plan process, as we have demonstrated above such insetting is unnecessary for the achievement of objectively assessed development needs. Moreover, significant harm is also likely to arise from the insetting of East Horsley as a result of the more intensive development permissible under non-Green Belt planning rules. Such harm may include:

a) Harm to the openness of the Green Belt across a low-density settlement area;
b) Harm to the purposes of the Green Belt - Pegasus have assessed three defined purposes as currently being achieved;
c) Harm to the character of the rural village settlement;

d) Harm to local biodiversity and loss of wildlife corridors.

1.5.2 ‘Effective joint working’ has not been in evidence during the plan preparation. EHPC objected to the proposed insetting of East Horsley at three separate consultations. At no time did officers of GBC attempt to engage directly with EHPC to discuss the proposed insetting, nor suggest any alternatives. Joint working has been non-existent.

1.5.3 Since the proposed insetting policy offers no benefit in terms of meeting housing needs and is likely to cause significant harm to both the openness and purposes of the Green Belt and to the rural character of the village, on the effectiveness test EHPC believes this policy is unsound.

1.6 Is the policy consistent with national policy? – able to achieve sustainable development in accordance with the Framework’s policies.

1.6.1 NPPF paragraph 86 states:
“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”

As discussed in Paragraph 1.4.4 earlier, East Horsley does meet the three criteria as tested by Pegasus for remaining within the Green Belt.

1.6.2 Moreover, as discussed in Paragraph 1.4.6 earlier, the large majority of the East Horsley settlement area is classified as High Sensitivity Green Belt in the Pegasus Green Belt Purposes Assessment.

1.6.3 On these grounds EHPC contends that the open character of the village does make an important contribution to the Green Belt in this area. As such it is contrary to NPPF paragraph 86 to propose the insetting of East Horsley.

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

1.6.5 As paragraph 1.5.2 above explained, there has been no such ‘meaningful engagement’ and therefore the insetting policy is also contrary to NPPF paragraph 155.

**1.7 Overall assessment**
1.7.1 On each of the inspector’s four criteria for testing the soundness of the policy, in proposing the insetting of East Horsley from the Green Belt, Policy P2 should be considered unsound.

1.8 Proposed modification to the plan:

How can the plan be modified to make it sound?

1.8.1 EHPC contends that the plan can only be made sound if East Horsley is removed from the list of villages proposed for insetting from the Green Belt under Policy P2. The East Horsley Neighbourhood Plan and the 37% expansion of the village settlement area as proposed in the plan together form an effective basis for ensuring the long term sustainable development of East Horsley.

Appendix 2:

EHPC hearing statement addressing the insetting of East Horsley

The following address was delivered by EHPC’s representative, Mr Peter Bennett-Davies, at the examiner’s hearing held in Millmead on 26th June 2018.

Sir, I should like to make some brief comments about the proposed insetting of East Horsley, supplementing the Statement submitted by East Horsley parish council in May.

Essentially, there are three reasons why insetting of East Horsley is unsound:

Firstly, in their Countryside Study Pegasus classify over 90% of the East Horsley settlement area as being High Sensitivity Green Belt. If it is so sensitive, where is the logic in proposing it to be inset?

Secondly, the justification provided by Pegasus for insetting is flawed. They take a 3 step approach but at each stage their analysis contains material errors. In Step 1 they classify East Horsley as being a Medium Density settlement but at 8 dph, it must surely be Low Density. In Step 2 they say East Horsley is mainly surrounded by defensible green belt boundaries, whereas the figure measured by our planning mapper comes to just 39% of the total settlement boundary. And in Step 3 Pegasus claim that East Horsley is not surrounded by open areas whereas in actuality 61% of the settlement boundary adjoins open land.

Thirdly, insetting is unnecessary for meeting the objectively assessed housing needs of East Horsley. Five sites are allocated in the local and neighbourhood plans, sufficient to meet the assessed needs of 170 homes by 2033. Together with a high historic rate of windfalls, (110 homes in the last 15 years), plus a 37% expansion in the settlement area proposed in the Local Plan, the OAN of East Horsley is likely to be substantially exceeded over the lifetime of the local and neighbourhood plans. None of this development is dependent upon the village being inset from the Green Belt.

The parish council believes that the site allocations in the local and neighbourhood plans, combined with an expanded settlement boundary, form a sound basis for the long term sustainable development of East Horsley. Insetting is unnecessary and risks harm to the character of the village.

Accordingly, East Horsley parish council believes, sir, you should find the proposed insetting of East Horsley to be unsound.

Attached documents:

Comment: MM40 - LPMM18/432  Respondent: East Horsley Parish Council (Nick Clemens) 8929057  Agent: Guildford Local Plan: comments on Proposed Modifications  East Horsley Parish Council ("EHPC") submits this letter under GBC’s current local plan consultation addressing Site
Policy A35, land at the former Wisley airfield in Ockham. Comments by EHPC on other policy modifications are provided in a separate letter.

POLICY A35 Land at former Wisley airfield, Ockham

MM40 of the Modifications Schedule sets out a number of minor changes to site policy A35, the development of a new settlement at the former Wisley airfield site. However, our primary concern is why, after a public inquiry and the Secretary of State’s robust refusal of planning permission, have GBC chosen to keep this site policy within the local plan?

Implications of planning appeal decision

In September/October 2017 an extensive public inquiry was held following a planning appeal by the site owner, Wisley Property Investments Ltd (‘WPIL’), subsequent to the unanimous refusal of planning permission by GBC’s Planning Committee in April 2016. The site addressed at the appeal was marginally different from Site Policy A35, which has been expanded to include land surrounding Bridge End Farm at the southern edge of the site.

On 13th June 2018 the WPIL appeal was refused by the Secretary of State, the announcement being made whilst the local plan was still being examined. In reaching their decision both the inspector and the Secretary of State gave considerable weight to the Green Belt harm caused by the proposed development, gave substantial weight to the severe impact on the strategic road network, considerable weight to the harm done to heritage assets, significant weight to the harm done to local character and appearance, and significant weight to irreversible landscape harm, including permanent harm to views from the Surrey Hills AONB.

The appeal inspector, Mr Clive Hughes, was particularly critical about the impact which the development would have on the character of the local area, commenting in paragraph 20.95:

“...the overall impact would result in substantial harm to the character of the immediate area. Being sited at the very heart of Ockham parish it would, in effect, link all the surrounding hamlets. It would erode the historic pattern of development in the area to the detriment of the character of these settlements. It would fail to reflect or respect its immediate setting and I agree with the nearby residents that this impact would be catastrophic on their rural way of life.”

With such a clear refusal of the WPIL appeal, it was therefore surprising that just two days’ later on 15th June 2018, GBC issued a ‘Discussion Note’ stating their intention to retain Site Policy A35 within the local plan. Three main grounds were cited by GBC for this position:

a) that Policy A35 was different to the appeal site, being a total of 95.9 hectares in size compared to the 114.7 hectares of the appeal site, although the developable land area was increased by approximately 20%;

b) that the removal of this site from the Green Belt would mean Green Belt harm was no longer a relevant planning consideration;

c) that Highways England and WIPL were close to finalizing an agreement over infrastructure contribution which would allow Highways England to withdraw their objection to this development that they had lodged at the appeal.

Site Policy A35, like all of the larger sites within the local plan, has been subjected to examination by the local plan examiner, Mr Bore, in the first half of 2018. In February 2018 EHPC submitted a Statement to Mr Bore addressing Site Policy A35 – ie, well before the WPIL appeal decision had been announced. For ease of reference a copy of this Statement is given in Appendix 1 of this letter and provides a detailed argument as to why Site Policy A35 is unsound, including (in its Appendix B) a detailed planning balance demonstrating that the Exceptional Circumstances test needed to justify removing this site from the Green Belt is not met.

The examiner’s public hearing for Site A35 was held on 5th July 2018, the very last item to be considered at the examiner’s open sessions. At this hearing EHPC’s representative drew attention to the flaws in GBC’s argument that the site is materially different from the WPIL appeal site. As our representative explained, the difference between the two sites only increases the overall planning harm, it does not reduce it. He further explained that the strongly negative planning balance means the Exceptional Circumstances test is not met, so the argument that Green Belt harm is irrelevant is fallacious. A copy of this hearing address is given as Appendix 2 to this submission.
At the public hearing it also became evident that Highways England had still not finalized any agreement with WPIL over the road infrastructure commitments required to support site development.

Despite all of the arguments against this site, as soon as the Site Policy A35 hearing was concluded the examiner summarised his overall position on the local plan, announcing he was not intending to recommend the removal of any sites.

Flaws in the local plan process

EHPC believes the local plan process contains a series of flaws in respect of Site Policy A35, including the following:

a) The examiner’s decision on Site Policy A35 was made within a few minutes after the closing of the public hearing. He could not possibly have had the time to properly consider and assess all of the arguments presented during that day. This is a clear case of pre-determination;

b) The examiner did not recommend the removal of any sites from the local plan. Given the large number of well-argued cases presented against many sites within the local plan, the absence of any one single site being proposed for removal implies either that the examination process in reviewing sites was little more than a token exercise, having no real validity, or that the benchmark level used by the examiner for assessing the soundness of any site policy was set so high as to be effectively worthless;

c) The examiner did not permit any further written submissions from hearing participants on Site Policy A35 following the publication of the Secretary of State’s appeal decision, other than from GBC. In view of the importance of the appeal decision towards assessing the soundness of Site Policy A35, we believe such submissions should have been permitted.

d) GBC issued their Discussion Note on Site Policy A35 within two days of the Secretary of State refusing the WPIL appeal. The extensive arguments made by the appeal inspector and the Secretary of State cannot possibly have been properly reviewed by GBC and their advisers. Yet it seems that GBC are so determined to retain this site within the local plan that even the reasoned arguments of the appeal inspector and the Secretary of State counted for nothing.

The deficiencies of this site have been covered at length in earlier consultation submissions made by EHPC and many others. The Secretary of State and the appeal inspector in their June 2018 report provided a detailed review of the key planning benefits and harms involved by this development. The modest differences between the WPIL site and Site Policy A35 have no qualitative impact on the fundamental planning issues in this respect.

EHPC believes the case for removing Site Policy A35 from the local plan is now overwhelming. In particular we would highlight the following factors:

a) The Exceptional Circumstances test for Green Belt release is not met, as set out in detail in our Statement to the examiner shown in Appendix 1;

b) The site is fundamentally unsustainable. This is one of the most fundamental requirements of NPPF policy, yet the updated Sustainability Appraisal provided to GBC by AECOM still shows this site as having the worst sustainability of any large site within the local plan;

c) All necessary infrastructure facilities have to be newly provided. This will involve a number of substantial new infrastructure projects of different kinds with considerable uncertainties over their delivery and funding. We note in particular:

i. The development is effectively dependent upon the completion of a major new road improvement scheme at the busy A3/M25 junction, the timing and design of which still remains uncertain;

ii. The development is also dependent upon the building of new south-facing slip roads to and from the A3 at the Burnt Common junction, whose timing and funding is also uncertain;

iii. Policy A35 requires a mitigation scheme to address traffic issues at the junction of Ripley High Street and Newark Lane (leading to Woking), but it is not evident that such mitigation is physically possible;
iv. Major new sewage facilities will be needed at Ripley sewage works, the timing of which is uncertain;

v. Highways England objected to the proposed development at the WPIL appeal due to its harmful impact on the strategic road network and although GBC’s Discussion Note of July 2018 indicated an agreement between WPIL and Highways England was imminent, no such agreement has yet been announced.

d) Additional ecological protection may be required from that proposed by WPIL in their refused planning application. This follows from two recent landmark judgements in the Court of Justice for the EU, namely the ruling on 25th July 2018 by Advocate General Kokott concerning nitrogen deposition at protected sites, and the decision on 13th April 2018 in the matter of ‘People Over Wind’ which potentially alters the UK position in relation to appropriate assessments under the Habitats Directive. Previously-proposed SANG provisions and other ecological measures may have to be significantly enhanced at Site A35 as a result of these rulings, potentially reducing the developable area of the site still further.

e) The only reason for having such an unsustainable site within the local plan is its potential contribution towards new housing supply in the borough. However, we note that:

i. The latest national housing projections released by ONS show major reductions in the projected housing need through to 2034, an approximate 25% reduction nationally from previous projections. Accordingly, it may well be questioned whether the future housing need will actually exist to justify building new homes on the scale proposed for this new and remotely-located settlement;

ii. Total housing numbers planned in the latest version of the local plan show the Wisley site is unnecessary for meeting the overall assessed housing needs of the borough, as estimated in the new version of the local plan. At the examination hearing it was GBC’s own QC who told the examiner that: “It is true we could do without 2000 homes from the totalled site allocations”

iii. Due to delays in delivering infrastructure, it is now highly unlikely that this site will make any contribution to the 5 year housing supply of the borough. This appears to have been the most important factor used by the examiner in deciding not to remove any sites from the local plan.

Concluding remarks

Site Policy A35 is based upon a site which is unsustainable and totally reliant on infrastructure whose delivery is highly uncertain. The appeal inspector commented that the impact of this development on local residents would be ‘catastrophic’ to their way of life, yet its contribution to borough housing targets appears unnecessary.

Accordingly, we urge GBC to remove Site Policy A35 from the local plan.

Appendices:

1. EHPC Examination Statement: Site Policy A35, the former Wisley airfield

2. EHPC hearing address on Site Policy A35

Appendix 1:
Examination statement by East Horsley parish council: Site Policy A35, Wisley airfield

The following is an extract from the examination statement submitted by East Horsley parish council to the local plan examiner, Mr. Bore, on 8th May 2018.

2. PART TWO:

Site Policy A35, new settlement at Wisley airfield

Matters & Issues: 11.33

2.1 In paragraph 11.33 of Matters & Issues (ID-3) the inspector asks in relation to Site Policy A35, the proposed new settlement at the former Wisley airfield in Ockham: “Are there local level exceptional circumstances that justify the release of the site from the Green Belt?”
2.2 EHPC contends that there are not and indeed that the policy fails all four of the tests for soundness set out in the inspector’s Guidance Notes (ID-2), as discussed in turn below.

**Tests for Soundness:**

2.3 **Is the policy positively-prepared?** - based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

2.3.1 Site Policy A35 proposes a new settlement with approximately 2,000 new homes. This represents 16% of the plan’s overall housing target for Guildford borough and around 19% of estimated OAN. It would be the largest single site housing contribution to the plan.

2.3.2 However, this large scale is also a major weakness, given the very significant risks associated with the delivery of this site. Major infrastructure investments of various different kinds are required in order to enable the site to function effectively and the timescale and delivery of such infrastructure remains highly uncertain.

2.3.3 Examples of this delivery risk include:

a) Highways England objected to the WPIL planning application at the Wisley public inquiry held in September/October 2017 due to the projected impact of the development on A3 traffic flows. As the statutory authority any future development at this site would normally require their support.

b) All local services will need to be established including substantial new sewage treatment facilities, which Thames Water have indicated will require a minimum of 3 years to construct from the time planning approval is granted.

c) Local opposition to the proposed development has been very strong and future legal challenges against this complex development cannot be ruled out, potentially delaying the development or even preventing it entirely.

2.3.4 In preparing the plan GBC have not attempted to define the locations of housing need across the borough. This is unfortunate since it is evident from the ONS population projections that the greatest housing need of the borough arises primarily within the metropolitan area of Guildford. The Wisley airfield site is not needed to satisfy the housing needs of the parish of Ockham, nor any of the surrounding parishes. It is needed primarily to satisfy housing needs within the Guildford metropolitan area, some 10 miles away. However, no connecting railway or bus services currently serve this site, which would be highly car dependent, housing commuters who drive daily into Guildford or London for their employment.

2.3.5 All of this uncertainty in delivery means that there are very considerable risks associated with this entire project. Whilst Policy A35 is ambitious, the overall plan viability is being put at risk if there is any failure to deliver this large site in an effective and timely manner.

2.3.6 Accordingly, EHPC believes that the risk concentration associated with this site is too high for the plan and as such it fundamentally undermines its robustness and viability. Therefore, on the test of being ‘positively-prepared’ EHPC believes that Policy A35 should be considered unsound.

2.4 **Is the policy justified?** - the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

2.4.1 The NPPF requires that a local plan demonstrates ‘exceptional circumstances’ to justify the release of land from the Green Belt. The customary approach is to consider all of the cumulative benefits or gains arising from the proposed development and compare them against all of the various damage or harms that would result. EHPC’s assessment of the planning balance for Site Policy A35 is provided in our Appendix B.

2.4.2 EHPC’s assessment shows benefits only from the provision of new housing, plus a minor employment gain, arising from a site which is not sustainable. As detailed in Appendix B, offsetting this are the harm to the Green Belt from inappropriate development, harm to the openness of the Green Belt, harm to the purposes of the Green Belt, harm due to impacts on the strategic and local road network, harm to local air quality, harm to protected environmental areas and biodiversity, harm due to the loss of best and most versatile agricultural land, harm to local character and heritage assets, harm to views from the Surrey Hills AONB and harm due to impacts on social infrastructure across the area.
2.4.3 The weighting which EHPC attributes to these planning gains and harms in the planning balance is summarised below:

<table>
<thead>
<tr>
<th>Factor</th>
<th>Weight</th>
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<tbody>
<tr>
<td>Gain: Housing</td>
<td>Substantial</td>
</tr>
<tr>
<td>Employment</td>
<td>Minor</td>
</tr>
<tr>
<td>Harm: Green Belt</td>
<td>Substantial</td>
</tr>
<tr>
<td>Traffic impacts</td>
<td>Substantial</td>
</tr>
<tr>
<td>Environment</td>
<td>Moderate/Substantial</td>
</tr>
<tr>
<td>Agricultural land</td>
<td>Substantial</td>
</tr>
<tr>
<td>Local character</td>
<td>Substantial</td>
</tr>
<tr>
<td>Surrey Hills AONB views</td>
<td>Substantial</td>
</tr>
<tr>
<td>Heritage assets</td>
<td>Substantial</td>
</tr>
<tr>
<td>Social infrastructure</td>
<td>Minor/Moderate</td>
</tr>
</tbody>
</table>

OVERALL PLANNING BALANCE:

2.4.4 The preponderance in the planning balance is therefore overwhelming harm from the proposed development, set against the selection of an unsustainable site for inappropriate housing development.

2.4.5 The planning balance emphatically addresses the inspector’s fundamental question raised in Matters & Issues 11.33 – there are no exceptional circumstances to justify the release of this site from the Green Belt.

2.5 Is the policy effective? - deliverable over its period and based on effective joint working.

2.5.1 The site is certainly available for development. Whether it is deliverable is highly uncertain. In particular major infrastructure uncertainties remain, the most fundamental of which relate to the strategic road network.

2.5.2 The site lies in close proximity to the M25/A3 junction, one of the busiest in the country, and one where major improvement works are now being planned by Highways England. The final design and timescale of this improvement scheme are still to be determined but these decisions will have a significant bearing on the timescale and traffic patterns around the proposed new settlement. As mentioned in paragraph 2.3.3 earlier, Highways England objected to the planning application in the 2017 public inquiry due to its impact on A3 traffic flows in the area.

2.5.3 A further A3 junction is also proposed in connection with this site involving new slip roads being constructed at Burnt Common in Send. Timing, layout, design and funding for these proposed slips roads and the associated access roads are all very uncertain at this juncture, yet this expanded junction would have a major impact on traffic flows in the area. This is particularly acute through the already congested Ripley village and at the Ockham roundabout, the main access point into and out of the new settlement.

2.5.4 All other infrastructure at the site will need to be newly provided. For waste water, Thames Water has determined that additional capacity will be needed at the Ripley sewage treatment works, with at least three years’ construction time required.

2.5.5 The concept of ‘effective joint working’ is curious. The site owner, WPIL, is based in the Cayman Islands and does not disclose its beneficial ownership. At this juncture it is unclear as to who precisely will take on the responsibility for delivering this new settlement.

2.5.6 Local opposition is substantial. Over 90% of local residents oppose the development, as do all the local parish councils, Cobham Conservation & Heritage Trust, the RSPB and Highways England. This situation only adds to the fundamental uncertainties associated with this project.

2.5.7 Given the high level of uncertainties for deliverability of the new settlement, on the test of effectiveness EHPC believes Policy A35 must be considered unsound.
2.6.1 The inadequate sustainability of this site is not in dispute. The site is located in a relatively isolated position with limited opportunities for promoting alternative sustainable modes of travel other than by car. There is no existing public transport. The nearest train stations are Horsley and Effingham Junction some 2 – 3 miles away. Neither station currently has significant parking capacity. The proposed new settlement will add to traffic congestion in the area and lead to further pressure on an already strained rural road network.

2.6.2 There are presently no schools, medical services or shops within walking distance of the site. None of the schools or medical services in nearby settlements has capacity to service the additional population arising from 2,000 new homes. New on-site facilities proposed under Policy A35 will need time to be established, forcing early residents to travel around the local area by car. All on-site services will need to be established.

2.6.3 Presently, there is no employment at the site and only modest levels likely after the development is completed. Most site residents will travel to work outside of the site. At the 2017 public inquiry a modal analysis presented by WPIL’s transport consultant, WSP, showed that the very large majority of residents will continue to travel from the site by car long after the settlement has become fully established. All current local bus services need heavy subsidies and the policy requirement for a shuttle bus service to be established in perpetuity remains financially uncertain.

2.6.4 In June 2017 GBC’s consultant, Aecom, published a Sustainability Appraisal of all policy sites within the Local Plan. Policy A35 received 8 ‘red flags’ out of the 20 assessed criteria, giving it the worst sustainability of any large site in the plan.

2.6.5 Given its high dependence upon car transportation, EHPC believes that Site A35 does not meet an acceptable level of sustainability. As such it is contrary to the most fundamental of NPPF policies.

2.6.6 There are many more NPPF policies with which Policy A35 fails to comply, including the following:

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Subject</th>
</tr>
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<tbody>
<tr>
<td>7-9</td>
<td>The need to pursue sustainable development</td>
</tr>
<tr>
<td>10</td>
<td>Recognising local circumstances in achieving sustainable development</td>
</tr>
<tr>
<td>14</td>
<td>Presumption in favour of sustainable development</td>
</tr>
<tr>
<td>17</td>
<td>Importance of local context, character &amp; rural communities</td>
</tr>
<tr>
<td>58</td>
<td>Responding to local character &amp; history</td>
</tr>
<tr>
<td>60</td>
<td>Promoting local distinctiveness in design</td>
</tr>
<tr>
<td>61</td>
<td>Need to integrate into the natural, built &amp; historic environment</td>
</tr>
<tr>
<td>64</td>
<td>Need to improve the character &amp; quality of an area</td>
</tr>
<tr>
<td>79</td>
<td>The fundamental importance given to the Green Belt</td>
</tr>
<tr>
<td>80</td>
<td>The various purposes of the Green Belt</td>
</tr>
<tr>
<td>84</td>
<td>Need to promote sustainable patterns of development</td>
</tr>
<tr>
<td>88</td>
<td>Weight given to Green Belt harm</td>
</tr>
<tr>
<td>89</td>
<td>Inappropriate forms of development in the Green Belt</td>
</tr>
<tr>
<td>112</td>
<td>Priority given to protecting the best &amp; most versatile agricultural land</td>
</tr>
<tr>
<td>118</td>
<td>Conservation &amp; enhancement of biodiversity</td>
</tr>
</tbody>
</table>

2.6.7 The list above is by no means exhaustive but its considerable length highlights the material non-compliance of this site with NPPF policies.

Attached documents:

Comment: MM40 - LPMM18/433  Respondent: East Horsley Parish Council (Nick Clemens) 8929057  Agent:
2.7 Overall assessment

2.7.1 There are three basic criteria for site selection in any development plan: availability, deliverability and sustainability. In the case of Site A35 these may be summarised as follows:

Availability: Yes, the site is available
Deliverability: Possibly, although there are major uncertainties
Sustainability: No, the site is not sustainable

2.7.2 The planning balance of our Appendix B shows that exceptional circumstances do not exist to justify removal of this site from the Green Belt. Taken together with the failure to satisfy the inspector’s four tests for soundness, EHPC believes that Site Policy A35 should be considered unsound.

2.8 Proposed modification to the plan:

How can the plan be modified to make it sound?

2.8.1 EHPC contends that the plan can only be made sound if Policy A35 is removed from the plan.

2.8.2 The loss of housing numbers in the plan implied by this removal may be partially compensated from additional housing that will arise as a result of planning decisions and appeal decisions made outside of the plan. This would include, from recent months, the Howard of Effingham School site in Effingham (295 homes) and the Guildford Station re-development (438 homes), both of which may result in significantly earlier housing delivery than would otherwise come about from a new settlement at Wisley airfield.

East Horsley Parish Council
8th May 2018

APPENDIX B Site Policy A35: the planning balance (Appendix to examination statement of 8th May 2018)

1. a) Introduction

This Appendix provides comments on the overall planning balance for Site A35, land at the former Wisley airfield in Ockham, provided as support in addressing the inspector’s Matters & Issues No. 11.33, namely: “Are there local level exceptional circumstances that justify the release of the site from the Green Belt?”

The customary approach towards assessing ‘exceptional circumstances’ is to consider all of the cumulative benefits or gains arising from Site Policy A35 and compare them against the various damage or harms that would result from the proposed development.

Much of the material in this Appendix has been drawn from the public inquiry held in September/October 2017 in relation to a planning appeal by the site owner, Wisley Property Investments Ltd (‘WPIL’). Such material was not fully available prior to the public inquiry, in which EHPC acted as a joint Rule 6 party.

At the time of writing, this planning appeal is still to be determined by the Secretary of State.

1. b) Planning gains

B1.1 With 2,000 new dwellings proposed at the new settlement, housing represents the main planning gain from Policy A35. Such housing is not needed to satisfy the housing needs of Ockham parish, nor the collective needs of the other four parishes surrounding this site. Justification comes from its important contribution to Local Plan housing targets across Guildford borough. Effectively, this means a contribution towards the housing need of the Guildford metropolitan area – despite the fact that Guildford town centre is around 10 miles away from this site.

B1.2 Given its significance to Local Plan housing targets, EHPC attributes ‘substantial’ weight to this planning gain.
B1.3 Policy A35 additionally proposes 4,300 square metres of employment floorspace, 1,100 square metres of retail space and 1,050 square metres of local services space. Given the relatively small scale of these facilities and the large-scale availability of office and factory units in nearby Brooklands, in a planning balance EHPC attributes only a ‘minor’ weighting to such employment gains.

B1.4 Policy A35 also proposes a range of new infrastructure. Substantial contributions to two major A3 projects are included - the A3/M25 junction and new slip roads at Burnt Common – plus smaller traffic and cycle route projects. All such contributions arise from the need to mitigate the impacts of the development and as such cannot be considered a planning gain.

1. **b) Planning harms**

**B2.1 Harm to the Green Belt**

B2.1.1 Site A35 is currently part of the Metropolitan Green Belt. Development at this site is therefore considered inappropriate and harmful to the Green Belt.

B2.1.2 In the Green Belt & Countryside Study by Pegasus Planning, Appendix I provides a Green Belt Purposes Assessment in which land parcels across Guildford borough are assessed to determine whether or not they meet the NPPF-defined purposes of the Green Belt.

B2.1.3 Site A35 falls primarily within Land Parcel C18 and accounts for the majority of that area. Pegasus give the following assessment:

- **Purpose 1** Does not check the sprawl of large built-up areas
- **Purpose 2** Does not prevent neighbouring settlements from merging
- **Purpose 3** Minimal existing development, therefore safeguards the countryside from encroachment
- **Purpose 4** Preserves the setting of Ockham historic village and conservation area

Since Pegasus consider Parcel C18 fulfils two purposes of the Green Belt (Purposes 3 & 4), they assess it as *Medium Sensitivity Green Belt*.

B2.1.4 EHPC believes this analysis is flawed. The site is located in a key strategic position just outside the M25 circle, set between the suburban developments of the London conurbation, Woking and the rural village areas outside the M25. Development here will represent the loss of a vital ‘salami-slice’ that could eventually culminate in urbanisation of the entire A3 corridor from London to Guildford. Purpose 1 is clearly being fulfilled.

B2.1.5 Regarding Purpose 2, the separation of the historic villages of Ockham, Cobham, Wisley, Ripley, West and East Horsley is being achieved by a number of areas of countryside of which this site represents the largest and most important. Purpose 2 is thereby being fulfilled.

B2.1.6 As such, EHPC believes the site fulfils four of the defined purposes of the Green Belt, not two, and should rightly be classified as *High Sensitivity Green Belt*.

B2.1.7 The site is also very open – it could hardly be more so. Even the brownfield element of the runway and hard-standing is all open land. Harm due to the loss of openness to the Green Belt is self-evident.

B2.1.8 Accordingly, removing Site A35 from the Green Belt will represent harm from inappropriate development, harm to the openness of the Green Belt and harm to the purposes of the Green Belt. EHPC therefore attributes ‘substantial’ weight to this Green Belt harm in the planning balance.

**B2.2 Traffic impacts**
B2.2.1 It is inevitable that locating a new settlement close to one of the busiest road junctions in England will create additional traffic congestion. In their refusal of WPIL’s planning application in 2015, GBC cited ‘severe traffic impacts’ on both the strategic road network and the local road network amongst their 14 reasons for refusal.

B2.2.2 At the 2017 public inquiry, Highways England objected to the proposed development due to its impact on A3 traffic flows. As the statutory body in this matter such opinion is normally definitive.

B2.2.3 The local road network consists of narrow, winding country lanes established many years ago to serve the local farming community. Most local roads do not have pedestrian pavements except for short lengths within the villages, few have street lighting and road surfaces are often in a poor state of repair due to high HGV volumes.

B2.2.4 Traffic modelling presented by WPIL at the 2017 public inquiry demonstrated the significant impact the development would have on this local network. For example, along Ockham Lane traffic volumes are predicted to rise by 150% as a result of the development – a severe impact indeed.

B2.2.5 Policy A35 also includes the following cycle route provision: “An off-site cycle network to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade, and Ripley and Byfleet to be provided with improvements to a level that would be attractive and safe for the average cyclist”.

B2.2.6 Safe cycle links to the closest railway stations of Horsley and Effingham Junction would be important for commuters. The natural routes run along Ockham Road North and Old Lane but both are narrow rural lanes, with tightly bordered carriageways and are presently suitable only for cyclists with advanced skills. Creating safe cycleways along these roads will require major road widening projects, even assuming additional land could be acquired.

B2.2.7 A cycle link to Byfleet would be dependent upon securing a right of way down Muddy Lane which runs underneath the M25. This is the subject of a future public inquiry and being opposed by local residents and landowners.

B2.2.8 Policy A35 requires that a new local bus service be secured in perpetuity to provide a sustainable transport option to site residents going to Effingham Junction and/or Horsley stations, Guildford, Woking and Cobham. High levels of subsidy are presently needed to support local public bus services around this locality, raising significant doubts over the financial viability of any ‘in perpetuity’ commitments.

B2.2.9 The car parks at both Horsley and Effingham Junction railway stations are presently operating at around capacity, a situation likely to be exacerbated by a further 400+ homes proposed for development in the Horsleys under the Submission Local Plan. However, there is no provision under Policy A35 to expand these car parks, nor was there any such provision in the Section 106 agreement signed during the public inquiry.

B2.2.10 The two retail areas closest to the site are in East Horsley and Ripley. Parking is very limited at both locations and likely to be severely strained if residents from the site choose to visit these villages for their shopping and services.

B2.2.11 In view of the significant impacts on both the strategic and local road network, EHPC considers the weight to be given to traffic harm in the planning balance should be ‘Substantial’.

B2.3 Environmental harm

B2.3.1 The site is immediately adjacent to Ockham Common, a designated SSSI, and falls within the Thames Basin Heath SPA Zone of Protection. Nearly three quarters of the site is greenfield. Even that part which is previously developed land is largely designated an SNCI and therefore must be considered as having high environmental value.

B2.3.2 Air quality near the busy A3 currently exceeds EU guidelines for nitrogen dioxide levels. Development at the site and the resultant increase in vehicle volumes will further deteriorate air quality, particularly on its western side. Governmental guidelines require no new schools should be built in areas of deficient air quality.

B2.3.3 The Thames Basin Heath SPA is subject to nitrogen pollution in excess of critical loads near this site. Development is expected to further increase nitrogen deposition, which will have a direct impact on plant health, high levels of NOx being toxic for plants.
B2.3.4 Whilst some mitigation may help limit environmental impacts, (eg. through warden monitoring of SANG areas), it is inevitable that a settlement of around 5,000 persons, plus their pets, will cause some degree of harm to these internationally important nature conservation assets. Accordingly, EHPC attributes a weighting of ‘Moderate’ to ‘Substantial’ to this environmental harm, depending upon the mitigation provided.

B2.4 Harm to agriculture

B2.4.1 The development will result in the loss of 63 hectares of agricultural land from within Grades 2, 3a and 3b, of which 44 hectares comprise ‘best and most versatile’ land. This is contrary to Policy RE7 of the current development plan and to Policy E5 of the Submission Local Plan.

B2.4.2 Accordingly, EHPC gives ‘substantial’ weight to this loss of agricultural land in the planning balance.

B2.5 Harm to local character

B2.5.1 The site lies within the landscape designation of Ockham and Clandon Wooded Rolling Clayland, which is characteristically rural with development consisting of scattered farmsteads, grand houses in parkland and rural villages. These villages have grown up organically over hundreds of years with a pattern of growth reflecting movement routes between them.

B2.5.2 This landscape character is valued by local people and forms the basis of positive recommendations for future conservation and enhancement of the landscape in the Guildford Landscape Character Assessment (GLCA). Policy A35 will cut directly across the GLCA landscape strategy and conflict with its prescriptions. It will cause significant harm to those attributes of the environment which people value and which contribute to their perception of the attractiveness and uniqueness of this area.

B2.5.3 Whilst Policy A35 does not itself specify the settlement configuration or masterplan layout, the constraints of the SPA and site geography mean that options are limited to a linear form of settlement. To achieve 2,000 homes within this constrained area a high density development is also necessary, such as that proposed by WPIL in their planning application. The visibility of such development is accentuated by its location on an existing ridge line - the WPIL planning application involved a line of 3, 4 and 5 storey housing running for 2 km.

B2.5.4 Such constraints would therefore lead to a wholly inappropriate form of development which would be highly urban in character and not take its design lead from the pattern of local villages, nor retain the traditional relationship between villages and the surrounding landscape. It will fundamentally diminish the rural character of this locality and be totally at odds with the built environment objectives of the GLCA and with Policy D4 of the Submission Local Plan.

B2.5.5 Due to its fundamental and irreversible impact on the character of this rural area, EHPC attributes a weighting of ‘substantial’ to such harm in the planning balance.

B2.6 Harm to views from the Surrey Hills AONB

B2.6.1 The development will be clearly visible from the Surrey Hills AONB, a well-used and much valued area of beauty used for recreational purposes. The length of the development and its height along an existing east-west ridge line serve to increase the visibility of the development and its consequential impact on the otherwise predominantly rural scene. From viewpoints in the Surrey Hills AONB above West Horsley this 2km long development will subtend an angle of 23 degrees and be the dominant feature of the panorama. Large expanses of glass windows, as well as south-facing solar panels fixed to building roofs, will tend to reflect sunlight and accentuate the intrusive impact.

B2.6.2 Due to the large-scale irreversible impact on views from the Surrey Hills AONB, EHPC attributes ‘substantial’ weight to this harm in the planning balance.

B2.7 Harm to heritage assets

B2.7.1 Ockham and the four surrounding parishes of East Horsley, West Horsley, Ripley and Wisley, are historic villages containing a total of 185 listed buildings. All have designated conservation areas. The insertion of a modern high-density
urban settlement into their midst will adversely impact their heritage character, contrary to Policy D3 of the Submission Local Plan.

B2.7.2 Several listed buildings are situated close to the site, including the cottage of Yarne on its eastern boundary. The setting and views from Yarne will be fundamentally impacted by this development.

B2.7.3 The impacts on the heritage character of the area and on the setting of Yarne will be fundamental, impacts not capable of effective mitigation under Policy A35. Accordingly, EHPC attributes ‘substantial’ weight to such harm.

**B2.8 Harm to social infrastructure**

B2.8.1 Medical centres and schools in this area currently have little or no spare capacity to absorb large numbers from the Wisley airfield site. Although Policy A35 supports building a medical centre and a school on-site, mechanisms for delivering these facilities are uncertain, as are timescales for the commencement of services.

B2.8.2 Impacts on social infrastructure are capable of mitigation through additional resourcing and Section 106 provisions. Accordingly, EHPC attributes a weighting of ‘minor’ to ‘moderate’ for such harm, dependent upon mitigation measures provided.

1. **c) The overall planning balance**

B3.1 The NPPF requires that a local plan demonstrates ‘exceptional circumstances’ to justify the release of land from the Green Belt.

B3.2 The overall planning balance for Policy A35 shows benefits only from the provision of new housing, plus a minor employment gain. Offsetting this are the wide range of harms as discussed above.

B3.3 The weighting which EHPC attributes to these planning gains and harms is summarised as follows:

<table>
<thead>
<tr>
<th>Factor</th>
<th>Weight attributed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gain: Housing</td>
<td>Substantial</td>
</tr>
<tr>
<td>Employment</td>
<td>Minor</td>
</tr>
<tr>
<td>Harm: Green Belt</td>
<td>Substantial</td>
</tr>
<tr>
<td>Traffic impacts</td>
<td>Substantial</td>
</tr>
<tr>
<td>Environment</td>
<td>Moderate/Substantial</td>
</tr>
<tr>
<td>Agricultural land</td>
<td>Substantial</td>
</tr>
<tr>
<td>Local character</td>
<td>Substantial</td>
</tr>
<tr>
<td>Surrey Hills AONB views</td>
<td>Substantial</td>
</tr>
<tr>
<td>Heritage assets</td>
<td>Substantial</td>
</tr>
<tr>
<td>Social infrastructure</td>
<td>Minor/Moderate</td>
</tr>
</tbody>
</table>

B3.4 The preponderance in the overall planning balance is overwhelming harm arising from the proposed development set against the selection of an unsustainable site for inappropriate housing development. The ‘exceptional circumstances’ test is not met.

**Appendix 2:**

**EHPC hearing address: Site Policy A35, the former Wisley airfield**

The following address was delivered by EHPC’s representative, Mr Peter Bennett-Davies, at the examiner’s hearing held in Millmead on 5th July 2018.

Sir, as advised when I spoke on 26th June, I am a resident of East Horsley and have been asked by Mr Robert Taylor - Chair of East Horsley PC Planning Committee who is on holiday - to make a statement on Site A35.

The additional 19 hectares surrounding Bridge End Farm do offer an opportunity to expand the developable area of the site, although this land is subject to certain constraints. For instance, it slopes steeply in places, parts are subject to
ongoing NATS beacon restrictions, parts will impact on the setting of the listed Bridge End House, parts are classified as Flood Zones 2 & 3, and there is a 0.5km boundary fronting directly on to Ockham Lane.

Both the Appeal site and Site A35 propose the same number of new dwellings. Therefore, inclusion of this additional land around Bridge End Farm should reduce overall housing density. In the Appeal, WPIL’s consultant estimated net housing density to be 49 dph in his masterplan. Since these additional 19 hectares represent 20% of Site A35, a comparable reduction in housing density may be anticipated – on a pro rata basis 39 dph is implied. However, given the site constraints mentioned, and dependent upon the masterplan proposed, something in the range of 40 – 45 dph might perhaps be more likely.

In their Position Statement issued after the Appeal decision, GBC has suggested these additional 19 hectares “could allow a less dense and linear development...” and that this would therefore lessen the harm to the character of the area so clearly identified by the Appeal inspector and Secretary of State. However, I would suggest that 40 to 45 dph still represents a high urban density and one which would necessitate extensive use of large-scale apartments. Moreover, the main central part of the site would, because of other site constraints, still require a strongly linear form.

+ With reference Appeal Inspector’s Report at paras 10, 18, 19 and 20 re the Surrey Hills AONB. The 2 km linear form subtends an angle of 22.5 degrees when viewed from a public viewpoint in the AONB.

Accordingly, any benefits of reducing harm to the character of the area are likely to be imperceptible, if not entirely illusionary. It may also be noted that the closest village of comparable size to Site A35 is East Horsley, which has a net housing density of 8 dph across its settlement area.

Considering the changes between the Appeal site and Site A35, I suggest that the incremental effect on these various items to the planning balance would be as follows:

1. a) Green Belt harm is worsened under Policy A35, since an additional 19 hectares of Green Belt fields around Bridge End Farm would be developed under this policy compared with the Appeal site;
2. b) The severe impact on the strategic road network would remain unchanged, since the housing numbers, (and by implication the numbers of car journeys), are the same;
3. c) Harm to heritage assets is increased. Bridge End House is a 16th Century Grade II listed building whose setting will certainly be affected by development very close by. Upton Farmhouse, a 15th Century Grade II listed building facing the extended settlement across Ockham Lane, may be similarly affected;
4. d) Harm to character, appearance and landscape are all worsened with the additional loss of 19 hectares of fields around Bridge End Farm, to be replaced by new housing development. Any minor reduction in overall site housing density is unlikely to produce the qualitative change needed to yield a perceptible lessening in harm to the character and appearance of this rural area. Since the new settlement will extend alongside Ockham Lane for an additional 0.5 km, it will also become much more visible from outside the site – whereas the WPIL masterplan had stressed its separation and screening from the existing Ockham community.

As such, sir, East Horsley Parish Council believes you should conclude that Exceptional Circumstances are not demonstrated and therefore that Site Policy A35 is unsound.

**Attached documents:**

Comment: MM9 - LPMM18/434  Respondent: East Horsley Parish Council (Nick Clemens) 8929057  Agent: Guildford Local Plan: comments on Proposed Modifications

East Horsley Parish Council (“EHPC”) has reviewed the modifications proposed by Guildford borough council (“GBC”) to the Submission Local Plan following its examination and submits this letter as part of the current consultation process. Our comments are focused on the modifications proposed by GBC following the examination of the plan. In this letter we look to address the following three policies:
• Policy P2 Green Belt – insetting of villages
• Policy P2 Green Belt – limited infilling
• Policy D1 Place shaping
• We shall also be submitting further consultation comments on Site Policy A35, the former Wisley airfield, which will be addressed in a separate letter.1.

POLICY P2 Green Belt - insetting

Proposed Modification MM9 makes a series of changes to Policy P2 Green Belt. Of particular concern to EHPC is that, following the local plan examination, Policy P2 has still not been revised in respect to the proposed insetting of villages. Specifically, East Horsley is still proposed for insetting.

Local Plan examination

Along with many other villages EHPC submitted a detailed Statement to the local plan examiner, Mr Bore, arguing that the proposed insetting of East Horsley was unsound. In our Statement, shown for convenience as Appendix 1 to this letter, we identified a series of errors in the analysis of Pegasus Planning Group in their Green Belt & Countryside Study, the main document used by GBC to justify village insetting. At the public hearing on this topic, held on 26th June 2018, EHPC’s representative summarised these errors for the benefit of the examiner, as did other representatives of villages across the borough. A copy of this hearing address is given as Appendix 2 to this letter.

The evidence against the Pegasus analysis is considerable, as the examiner openly acknowledged at the hearing. However, in his summing-up on 5th July 2018, the examiner announced that he had found the Green Belt proposals relating to insetting to be basically sound and that no modifications would be recommended in this regard.

Flaws in the local plan process

EHPC believes a number of flaws can be identified in the local plan process in respect of Policy P2, as follows:

a) It is remarkable that the examiner is not recommending any changes whatsoever to the list of villages proposed for insetting. Given all the deficiencies identified in the justification evidence during the examination, the absence of any one village being proposed for removal implies either that the examination process was no more than a token exercise, having no substantive validity, or that the benchmark level used by this examiner for assessing the soundness of this policy was set so high as to be effectively worthless;

b) In view of the substantial evidence presented to the examiner on the deficiencies of the Pegasus Green Belt & Countryside Study, it is also unclear why GBC still persist in using this study to justify the insetting of villages, including East Horsley. Even though the examiner failed to act upon the evidence provided to him, this does not excuse GBC from their basic professional duty to act on the correct information and to take appropriate action;

c) As detailed in Appendix 1, throughout all of the local plan consultations, EHPC have raised concerns about the proposed insetting of East Horsley, yet on no occasion have GBC attempted to engage in “meaningful engagement and collaboration” with EHPC, contrary to NPPF paragraph 155 on Plan Making;

d) At the hearing on this topic on 5th July 2018, the examiner suggested that the Horsleys parish councils should meet with GBC and review deficiencies in the insetting justification provided within the Green Belt & Countryside Study. However, when efforts were made to arrange such a meeting, it was refused by GBC on the grounds of being unnecessary – thus providing yet another example of GBC’s lack of engagement during the local plan process.

Based upon the evidence we have presented, EHPC believes the proposed insetting of East Horsley from the Green Belt is unsound and should be removed from the list of proposed inset villages.

2. POLICY P2 Green Belt – limited infilling

Proposed Modification MM9 makes a number of changes to Policy P2 in respect of ‘Limited Infilling’, with additional changes made in the supporting Reasoned Justification.

These changes considerably expand the text addressing ‘Limited Infilling’ in the Green Belt and in particular seek to define the situations where it may be appropriate and where it may not be. This policy area is thoroughly addressed in the
NPPF (paragraph 145) and clarified by planning case law in recent years. EHPC does not believe that any further clarification is either necessary or beneficial in this complex area where judgements may be required on the nature of settlement boundaries that are not easily defined within a local plan policy.

If GBC wishes to offer greater clarification on Limited Infilling then we believe this would be more appropriately done within the development management guidance document on Green Belt development which GBC has promised to issue in the near future.

EHPC believes the re-drafted Limited Infilling policy is unnecessarily detailed and should be deleted, allowing this topic to be clarified through development management guidance.

Attached documents:

Comment: MM2 - LPMM18/5416  Respondent: Caspar Hancock 8929921  Agent:

I wish to register my objection to the Local Plan and modifications.

The Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited

2. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination

3. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’. In view of the correction to the housing numbers as a result of the revised ONS figures, the major Green Belt developments at Wisley, Gosden Hill, Garlick’s Arch and Blackwell Farm should all be removed from the Local Plan.

Attached documents:

Comment: MM3 - LPMM18/5418  Respondent: Caspar Hancock 8929921  Agent:

1. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

Attached documents:

Comment: MM41 - LPMM18/5417  Respondent: Caspar Hancock 8929921  Agent:

1. There is too much reliance on A3 improvements and they are beyond the council’s control

Attached documents:
I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.
The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Godden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Godden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Godden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Godden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt
The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2899  Respondent: Ray Corstin 8930209  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.
**Comment: MM23 - LPMM18/2907  Respondent: Ray Corstin 8930209  Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Comment: MM3 - LPMM18/2897  Respondent: Ray Corstin 8930209  Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate

**Comment: MM3 - LPMM18/2906  Respondent: Ray Corstin 8930209  Agent:**

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Comment: MM31 - LPMM18/2900  Respondent: Ray Corstin 8930209  Agent:**
MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2901  Respondent: Ray Corstin 8930209  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2902  Respondent: Ray Corstin 8930209  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2903  Respondent: Ray Corstin 8930209  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2904  Respondent: Ray Corstin 8930209  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.
**Comment:** MM44 - LPMM18/2905  **Respondent:** Ray Corstin 8930209  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Comment:** MM9 - LPMM18/2898  **Respondent:** Ray Corstin 8930209  **Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Comment:** MM2 - LPMM18/5297  **Respondent:** Michael & Carol Cook 8930465  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and surrounding resident association and would like their responses to be registered as mine as well.

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   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to **RE-EXAMINE** the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

If Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

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I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

Traffic will increase significantly throughout the Clandons and Send and surrounding areas and our roads can not sustain an increase in housing and traffic.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.
MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

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**Comment:** MM23 - LPMM18/5301  **Respondent:** Michael & Carol Cook 8930465  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of **“green approaches”** should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined

**Attached documents:**

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**Comment:** MM3 - LPMM18/5299  **Respondent:** Michael & Carol Cook 8930465  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.
MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5302  Respondent: Michael & Carol Cook 8930465  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5303  Respondent: Michael & Carol Cook 8930465  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5304  Respondent: Michael & Carol Cook 8930465  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

---

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

---

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

---

I object to the continued inclusion in the Guildford Local Plan of the proposals for development of land on the former Wisley Airfield on the grounds that they would:

- damage irrevocably the character and appearance of the local area;
be completely inappropriate in the Green Belt;
cause enormous and unacceptable harm to the local road network;
create damaging impacts on the already inadequate local infrastructure;
and have harmful impact on the A3,
all of which were cited by yourselves, the Planning Inspector and the Secretary of State in relation to the planning application previously submitted.

I support the views on this matter of Ockham Parish Council, East and West Horsley Parish Councils and Wisley Action Group.

**Attached documents:**

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**Comment:** MM2 - LPMM18/5984  **Respondent:** Mark Edwards 8930689  **Agent:**

I am pleased to have the opportunity to comment on the local plan main modifications.

My comments relate to MM2 and the proposed housing requirement of 630 + 42 dwellings/year.

To be sound, a plan must be responsive to the underlying need, capable of execution and allow the exercise of control.

ONS states the number of homes in Guildford to be 56,000 in 2015 and 57,000 in 2018/19. The plan (Appendix 0) envisages the addition of 15,100 homes in the 19 year period; and more relevantly 13,800 in the 15 year period 2019-2034. This is a 24% increase in 15 years.

This compares with a 7.5% increase in the 15 years 2001-15. It is also higher – in absolute/percentage terms - than any period in Guildford’s history, including the arrival of the railways; and at a time when there is less available space than there has ever been. The plan fails to make the case that this level of household growth is needed: by contrast the ONS projects household growth of 5,000 to 2034. It does not even attempt to make a case that it is achievable – which it won’t be.

Further, in attempting to achieve the volume of development envisaged in the plan, Guildford’s planning authorities will be under pressure to accept any old tat that developers come up with (and they will come up with tat). The plan will therefore fail to allow the exercise of control.

The current plan is therefore unsound.

The role of an inspector in a totalitarian state is to impose central diktat. The role of an inspector in a democracy is to rescue the locals from their own foolishness. I would be grateful if the inspector intervenes to get the requirement reduced to a more sensible level. A target of 400/year would represent a 25% increase over recent years and so should be achievable, while at the same time substantially meeting realistic needs and allowing the exercise of planning control.

**Attached documents:**

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**Comment:** MM40 - LPMM18/4063  **Respondent:** Elizabeth Murphy 8931105  **Agent:**

656 of 2554
I object to the inclusion in the Local Plan of proposals relating to the development of the former Wisley Airfield, particularly and inter alia because:

i. they would be in breach of Green Belt policy, very special circumstances not having been demonstrated;

ii. they would urbanise a rural area;

iii. existing infrastructure is vastly inadequate and the proposal does not address this;

iv. proposed road closures are unsuitable and would impact unacceptably on the immediate and further communities.

The proposals constitute completely inappropriate development in a wholly unsuitable site. I support the views on this matter of West Horsley Parish Council, East Horsley Parish Council, Wisley Action Group and the CPRE.

Attached documents:

Comment: MM38 - LPMM18/1014  Respondent: Peter See 8933185  Agent:

Proposed Guildford Local Plan – Main Modifications

Main Modification 38

Policy A29: Land to the South & East of Ash & Tongham (1,750 homes approximately)

Requirement 8: Objection. The proposed text regarding Ash Manor should specify the minimum distance which must be left free of development, between integral parts of the Ash Manor (eg its moat) and future development. For example 200m.

Requirement 9: Objection. In spite of numerous requests, the proposed text regarding a new road bridge and footbridge over the railway south of Ash Station has not been modified to include references to proposed additional off-street parking and proposed cycle routes (on and off the carriageway). If you do not accept this objection at this stage, please let me know what action has been taken, or will be taken, to ensure that the following will be fully taken into account:

a) The new road bridge should have cycle lanes and wide footways for shared use by pedestrians and cyclists. It should be close to the south side of the level crossing (in order to minimise land-take, turning movements, injury accidents, air pollution, noise, buses and lorries in the proposed housing area to the south of Guildford Road A 323).

b) The footbridge should be suitable for older people, for people with disabilities, for mothers with push chairs or prams and for cyclists who wish to take their cycle on a train. So steps should be avoided. People living between Ash Hill Road B341 and the railway, walking or cycling to the south west of the railway (eg to Ash Grange Primary School) will not welcome a long detour to a footbridge south of the Guildford Road A323/Foreman Road junction. Note: An example of a combined footbridge/cycle bridge, without steps, is 2 miles away to the north, at the Lynchford Road A3011/Blackwater Valley Road A331 interchange (at the Guildford Borough boundary).

c) The Borough Council should give some priority to arranging off-street parking for vehicles and cycles, close to the station, to replace the existing car park which has insufficient capacity. Parked vehicles on Foreman Road already cause obstruction and safety risks.

Large numbers of new homes are almost ready for occupation and 100 more people may wish to park at Ash railway station during 2019. This number will increase in 2020 etc. What are your estimates? My letter to you dated 10 September 2014 emphasised the need for an additional off-street car park at Ash railway station, but I am unaware of any plans being made.
d) Safe and attractive cycle routes, on and off the carriageway, leading to and from the railway station, should be provided near to the station and within the proposed housing development.

Requirement 10: Objection. The proposed text regarding all land to the south and east of Ash and Tongham has not been modified to include the provision of safe and attractive cycle routes, on and off the carriageway, to schools, shops, recreation etc. If you do not accept this objection at this stage, please let me know what action has been taken, or will be taken, to ensure that attractive and safe cycle routes will be provided.

Comment: The proposed Local Plan specifies cycle routes regarding the Wisley Airfield site. So you are inconsistent and lacking a sense of purpose by not specifying them for land to the south and east of Ash and Tongham. If the Local Plan does not specify cycles routes on land to the south and east of Ash and Tongham, they may not be provided by developers. This would be contrary to Central Government, GBC and Surrey County Council cycle policies.

Attached documents:

Comment: MM45 - LPMM18/1015  Respondent: Peter See 8933185  Agent:

Main Modification 45
Policy A64: Land Between Glaziers Lane and Strawberry Farm, Flexford (105 homes approx.)

Objection. Too many homes are planned, so the development will not be in keeping with existing development. Also, there will be insufficient space for:

a) Attractive and safe cycle routes off the carriageway, eg to the railway station.

b) Adequate driveways for all homes.

c) Adequate gardens for all homes.

d) Highway trees and attractive green spaces.

Future Action
Bearing in mind my letters to you over the last 4 years about the proposed Local Plan, on this occasion I would appreciate a reply from you regarding the points which I have made in this letter. Thank you for this opportunity to comment.

Attached documents:

Comment: MM2 - LPMM18/4466  Respondent: William Ladd 8933409  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill

659 of 2554
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

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   MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/4471  
**Respondent:** William Ladd 8933409  
**Agent:**

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**Comment:** MM23 - LPMM18/4480  
**Respondent:** William Ladd 8933409  
**Agent:**

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**Comment:** MM3 - LPMM18/4468  **Respondent:** William Ladd 8933409  **Agent:**

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**Comment:** MM31 - LPMM18/4472  **Respondent:** William Ladd 8933409  **Agent:**

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**Attached documents:**

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**Comment:** MM32 - LPMM18/4474  **Respondent:** William Ladd 8933409  **Agent:**

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MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

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Attached documents:

Comment: MM41 - LPMM18/4478  Respondent: William Ladd 8933409  Agent:

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Attached documents:

Comment: MM44 - LPMM18/4479  Respondent: William Ladd 8933409  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/4469  Respondent: William Ladd 8933409  Agent:
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**Attached documents:**

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**Comment:** MM2 - LPMM18/4454  **Respondent:** Annie Ladd 8933537  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

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I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

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I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of
congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

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I believe that traffic will increase significantly because:

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3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
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5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/4457  **Respondent:** Annie Ladd 8933537  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.
MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

---

Comment: MM23 - LPMM18/4465  Respondent: Annie Ladd 8933537  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

---

Comment: MM3 - LPMM18/4455  Respondent: Annie Ladd 8933537  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

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Comment: MM31 - LPMM18/4458  Respondent: Annie Ladd 8933537  Agent:
MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

**Comment:** MM32 - LPMM18/4459  **Respondent:** Annie Ladd 8933537  **Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

**Comment:** MM33 - LPMM18/4460  **Respondent:** Annie Ladd 8933537  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

**Comment:** MM35 - LPMM18/4462  **Respondent:** Annie Ladd 8933537  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

**Comment:** MM41 - LPMM18/4463  **Respondent:** Annie Ladd 8933537  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded
<table>
<thead>
<tr>
<th>Comment: MM44 - LPMM18/4464</th>
<th>Respondent: Annie Ladd 8933537</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/4456</th>
<th>Respondent: Annie Ladd 8933537</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/3113</th>
<th>Respondent: Colin Selvin 8934401</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Housing developments are undoubtedly required but must be justified &amp; based on realistic &amp; up-to-date statistics; this requires re-examination.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/3112</th>
<th>Respondent: Colin Selvin 8934401</th>
<th>Agent:</th>
</tr>
</thead>
</table>
| 1. Advantage should indeed be taken of improvements to the A3, but these are not in the control of the Council.  
2. Transport infrastructure initiatives are not adequate. | | |

<table>
<thead>
<tr>
<th>Comment: MM3 - LPMM18/3111</th>
<th>Respondent: Colin Selvin 8934401</th>
<th>Agent:</th>
</tr>
</thead>
</table>
| I regret to say the Main Modifications in my view do not address the shortcomings set out as a result of the Examination in Public of the Guildford Local Plan proposal.  
1. Denser, more appropriately allocated town centre site development should be required. | | |
**Comment: MM9 - LPMM18/3114  Respondent: Colin Selvin 8934401  Agent:**

1. Green belt development will undoubtedly be required, but this should be concentrated in as few locations as are consistent with improved infrastructure. In particular it must be sufficiently sized & provide a full range of housing/care facilities to form effective & viable local centres which provide for eg schooling, local shops & community services, including medical provision.

**Attached documents:**

---

**Comment: MM2 - LPMM18/2076  Respondent: Ann Cook 8938881  Agent:**

**Guildford Local Plan: Comments on Proposed Modifications**

It is with considerable amazement that I write YET AGAIN to make comments on Guildford's Local Plan. This procedure has been on-going for over FIVE years; I have spent good money buying every edition of GBC's 'Local Plan Strategy and Sites: Issues and Options' right from October 2013. The good citizens of Guildford have sent thousands of comments to the Council regarding the proposals in these documents. However I have seen very little evidence that these comments have been noted in any degree!

**NUMBER OF HOUSES (MM2)**

I note that in this version of the plan the number of houses has increased by 1.4% from 12,426 to 12,600.

This is at a time when the Office For National Statistics has been projected a **reduction in growth** of households from 11,142 to 6,635; this 40.5% reduction equates to 2,507 homes. I do not understand the logic of GBC's proposals.

* **I therefore strongly object** to the proposals to increase the number of houses to be built as set out in MM2.

* In the light of the ONS figures Public Examination by the Planning Inspector needs to be reopened.

**Attached documents:**

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**Comment: MM40 - LPMM18/2080  Respondent: Ann Cook 8938881  Agent:**

**WISLEY AIRFIELD (MM40)**

Again I do not see the logic of persevering with the plane for the major development at Wisley Airfield when in June 2018 the Secretary of State upheld GBC's decision to refuse planning permission for the site. All the objections that were considered by The Secretary of State at that time still apply today.

* **I object to the proposals for the inclusion of Wisley Airfield in the Local Plan in the light of The Secretart of State's decision and in the light of the ONS figures.**

I also point out that the GBC have NOT kept Guildford residents well informed of developments regarding the Local Plans. I have responded each time a plan has been forward and I have requested notifications as appropriate. These have been VERY spasmodic.
Comment: MM9 - LPMM18/2077  Respondent: Ann Cook 8938881  Agent:

The GREEN BELT (MM9)

GBC makes great claims that "The Metropolitan Green Belt will continue to be protected against inappropriate development in accordance with the NPPF". However 66% of the proposed housing is planned for land currently in the Green Belt! This does not seem to be planned for land currently the Green Belt! This does not seem to be logical particularly in the light of the large reduction in projected growth of households. The insetting of villages seems particularly inappropriate with the new growth figures.

*I object to the proposal for 66% of building to be on Green Belt land particularly in the light of the latest ONS figures.

*I object to the insetting of so many villages particularly in the light of the recent ONS figures.

Attached documents:

Comment: MM35 - LPMM18/6117  Respondent: Martin Grant Homes (Martin Grant Homes) 8944737  Agent: Barton Willmore (Michael Knott)

GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES MAIN MODIFICATIONS CONSULTATION

REPRESENTATIONS SUBMITTED ON BEHALF OF MARTIN GRANT HOMES RELATING TO GOSDEN HILL, NORTH EAST GUILDFORD

We are pleased to enclose representations on behalf of Martin Grant Homes in response to the Guildford Borough Local Plan: Strategy and Sites Main Modifications consultation. The representations respond specifically to proposed main modification MM35 (Policy A25).

Martin Grant Homes is promoting Gosden Hill as a new sustainable neighbourhood and fully supports the identification of Gosden Hill as a strategic urban extension in the Guildford Local Plan. The site is in the sole ownership of Martin Grant Homes and is immediately available, deliverable and critical to the delivery of the housing strategy over the plan period.

These representations are submitted further to the representations submitted on behalf of Martin Grant Homes at previous stages of the Local Plan process, notably the two regulation 19 stage consultations undertaken in June/July 2016 and June/July 2017 and the further written statement submitted as part of the Examination process.

For the sake of brevity, the issues and matters put to the examination both orally and in writing relating to the soundness of the approach taken by Guildford Borough Council (GBC) in respect of the allocation of Gosden Hill are not repeated and are asked to be taken as duly made.

We broadly support the modifications proposed to Policy A25. However, we object to the proposed changes in relation to the potential opportunity for an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road, particularly with regard to Requirement (2).

Surrey County Council (SCC), as the Highway Authority, have confirmed that there is no need to deliver this aspirational junction in relation to Gosden Hill or to deliver the Local Plan' strategy. Indeed, all of the work which has been
undertaken by Martin Grant Homes' consultant team confirms these findings and demonstrates that neither the development of Gosden Hill nor the delivery of the Plan as a whole requires the delivery of this 'aspirational' link. As such, the proposal is not supported by any technical evidence.

We therefore maintain that this aspirational proposal cannot be justified.

The inclusion of the requirement is therefore contrary to paragraph 41 of the NPPF (2012) which states that:

'Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.' (our emphasis)

The further written statement submitted on behalf of Martin Grant Homes included a technical note prepared by i-Transport relating to this aspirational proposal. The note demonstrated that the strategic modelling which supports the Local Plan identifies that infrastructure proposed at Gosden Hill meets the needs of the development, whilst providing a strategic benefit to the operation of both the local and strategic highway. For ease of reference, a copy of this technical note is provided at Appendix 1.

The policy requirement was discussed at the Examination hearing session on Policy A25 which took place on 27th June, 2018. We understood that our points relating to this requirement were accepted by the Inspector and that this would lead to a recommendation to the Council to delete the requirement from the policy.

Against this background, it is surprising that this part of Policy A25 has been retained and that its wording has been modified to impose a potentially more onerous requirement on the developer. Specifically, we are deeply concerned that discussions with Council officers during the consultation has indicated that Martin Grant Homes could be required to design and assess an aspirational all movements junction as part of the Transport Assessment supporting a planning application. The requirement for a 'deliberative process of consideration' has no clear meaning and does not provide a clear framework for decision-making with its meaning entirely open to interpretation. It is therefore inconsistent with the first core planning principle set out in paragraph 17 of the NPPF (2012) which states that plans:

'should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.' (our emphasis)

Furthermore, through the pre-application discussions relating to the development of Gosden Hill, and the associated access strategy, as part held with GBC, sec and Highways England over the last 4-5 years, Martin Grant Homes' consultant team have never been asked to consider these proposals in any detail, given that they are not necessary for the delivery of Gosden Hill or the Local Plan. On this basis, the requirement is wholly unjustified and, therefore, unsound. We, therefore, maintain our position and seek the deletion of Requirement (2). This additional work, which is not necessary to deliver the Gosden Hill site would be costly and time consuming, frustrating the preparation of a planning application and, ultimately, the delivery of this development.

We understand that GBC's case is that this aspirational scheme could be required if, for an unforeseen reason, the proposed access with the A3 as set out in Requirement ( 1) is undeliverable. Whilst this contradicts the pre-application discussions which have been held over many years, it is simply unprecedented for a strategic site allocation policy to contain a contingency for the primary access.

This is reinforced when one takes into account that GBC's aspirational scheme requires third party land and has been the subject of representations from Highways England (see Appendix 2) which sought clarification on how such a scheme should be taken forward by GBC.

For all of the above reasons, we ask that the Inspector deletes Requirement (2) from Policy A25.

Notwithstanding our in-principle objection to Requirement (2), if reference to an aspirational all movements junction of the A3 is to be retained within Policy A25, it should be contained as an opportunity, rather than a requirement, to reflect the aspirational nature of the proposal and the lack of evidence demonstrating a need for a link between the Gosden Hill site and an all-movements junction, now or in the foreseeable future. As drafted, Policy A25 includes both a requirement
and an opportunity relating to a potential future all movements junction (Requirement (2) and Opportunity (6)). We therefore seek the amendment of the policy to remove the unnecessary duplication.

We have considered the wording of the requirement proposed by the Council and recommend that it is replaced with the following revised wording, if the Inspector is of the view that an opportunity or requirement could be justified:

**Deliberative process of eenisEleraitien te be undertalten aAs part of the development management process a route alignment on site is to be identified and potentially safeguarded between the improved A3 southbound access and the north east boundary of the site for use by the Borough Council to enable the potential opportunity to provide an all movements junctions of the A3 trunk road with the A3100 London Road, the 82215 London Road and the A247 Clandon Road. LanEI eould rtetentiallr be requireEI te be safeguarded fer the previsien ef a eeneeter read te the 82215 Landen Read/ A247 Glanden Read.**

Our revised wording seeks to make explicitly clear that detailed design and assessment of an all movements junction is not required to be carried out by Martin Grant Homes as part of a planning application for Gosden Hill whilst ensuring that the longer-term opportunity for a strategic improvement to the highway network to be delivered by the Council is not prejudiced. As such, the wording is consistent with the Council's aspirations for a potential scheme while not burdening the delivery of Gosden Hill.

As set out in representations previously submitted on behalf of Martin Grant Homes, the draft masterplan for Gosden Hill has been designed to accommodate a road network which will not prejudice the potential opportunity for the Council to provide a connector road within the Gosden Hill site

between the improved A3 junction and the north east boundary of the site to the 82215 London Road and I or A247 Clandon Road. The draft masterplan is, therefore, consistent with the revised wording proposed above and the aspiration of GBC.

We trust that the enclosed representations are duly made and look forward to receiving confirmation of their receipt.

see attachment for appendix

**Attached documents:** [Martin Grant Homes Rep_Redacted.pdf](#) (6.6 MB)

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**Comment: MM2 - LPMM18/5257** **Respondent:** A Jefferies 8944929 **Agent:**

I call for the examination in public to be re-opened to properly consider the latest ONS household formation statistics. I object to the fact that the spatial strategy has not been implemented and there appears to be a greenfield first policy, as evidenced by the new sites proposed. This is in contravention of policy and renders the plan unsound.

As a young person, I have no desire to live in the middle of nowhere, far from decent, reliable public transport and like most of my generation would prefer to live in the town centre. Building housing in the green belt sacrifices a valuable resource for my generation.

I object to the modifications in the plan and despite the new S3, this does not go far enough

**Attached documents:**

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**Comment: MM2 - LPMM18/260** **Respondent:** Alan Williams 8945505 **Agent:**

673 of 2554
I would like to record my strong objection to the published housing needs in The Local Plan which states that there is a need for a total of 672 new houses to be built every year to satisfy Guildford’s projected population increase. I recall that this has been a long standing and contentious issue throughout the development of the Local Plan over a number of years, and to which we have previously objected. I am disappointed to see that nothing seems to have changed.

In our opinion, and as shared by many other concerned Guildford residents, the housing figure is in error as it includes all overseas students currently (or projected to be) attending secondary education courses at Surrey University. These of course will only be temporary residents and therefore do not need be accommodated in the future housing needs. It is important of course that the students can be accommodated but I think that they should be treated separately and be delinked from the housing target which would then reduce the overall number.

Maintaining a figure of 672 houses per annum would mean developments on some of our beautiful Green Belt, particularly so at Blackwell Farm (as outlined in the Plan) which would be a sad indictment of previously stated policies of GBC to preserve the sanctity of the green belt at all costs, rather than justify encroachment to satisfy what might now be erroneous ‘unmet housing needs’.

I note from recent correspondence from the Guildford Society that there has been a recent review of the housing figure by ONS which has found that the original estimate of 672 was in error and that the correct figure is now closer to 400, which represents a massive 40% reduction. I trust the Inspector will respect this corrected figure and amend the housing numbers accordingly. It would be tragic if 2018 marked the date when future generations of Guildford would look back on the year when some of our beautiful countryside was lost for ever due to a numerical error.

Attached documents:

Comment: MM2 - LPMM18/4749  Respondent: Alan Williams 8945505  Agent:

Please bring the following to the attention of the Inspector regarding section MM2 of the Guildford Local Plan, about which I am seriously alarmed. Specifically these concerns regard the excessive housing numbers (670+) stated as necessary for the projected population growth in Guildford over the next 5 years and the destruction of 3 areas of our beautiful green belt in order to meet this target.

At a recent meeting of the Guilford Vision Group, it was confirmed that in fact the ONS have admitted that this number is in error and that a number close to 400 is now the correct figure, a 40% reduction. Surely this must require an urgent review of the necessity of building on the endangered green field sites.

I am also of the opinion, as I think was the Inspector, that insufficient effort had been made by the Council to evaluate brown-field sites within the city centre which would also help to reduce the new housing pressure on the green belt.

As Guildford residents, we have noticed in recent years a substantial increase in Retail developments – e.g. Waitrose and more recently, the new furniture super-store adjacent to the Fire Station where affordable housing could have been built. Nationally the retail sector is in decline due to the rise of on-line shopping so why keep building more in central Guildford instead of affordable homes?

Lastly, any developments on the margins of Guildford will require major upgrades to the already heavily congested A3 highway over which the Council has no control. Surely sorting this out should be a priority before any further house building linked to this highway is considered.

Please relay these comments to the Inspector and all relevant agencies.

Attached documents:
Comment: MM2 - LPMM18/3172  Respondent: Jenny Austin 8946113  Agent:

1 The council has not properly observed its hierarchy of development. Brownfield sites have not been fully explored. It is unsafe to rely on a third party to improve A3, the council has no control over these improvements and cannot guarantee that they will take place.

3 The grounds given for green belt development are inadequate and do not represent exceptional circumstances

4 Public hearings should be reopened to discuss Housing numbers to reflect the latest ONS figures and projections.

Attached documents:

Comment: MM27 - LPMM18/3174  Respondent: Jenny Austin 8946113  Agent:

1 The council has not properly observed its hierarchy of development. Brownfield sites have not been fully explored. It is unsafe to rely on a third party to improve A3, the council has no control over these improvements and cannot guarantee that they will take place.

Attached documents:

Comment: MM3 - LPMM18/3173  Respondent: Jenny Austin 8946113  Agent:

2 The town centre policy is inadequate, therefore, and does not deal properly with the infrastructure deficit

Attached documents:

Comment: MM2 - LPMM18/2412  Respondent: Joan Wrenn 8946497  Agent:

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

Attached documents:
Comment: MM23 - LPMM18/2415  Respondent: Joan Wrenn 8946497  Agent:

MM23 policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority.

Attached documents:

Comment: MM27 - LPMM18/2414  Respondent: Joan Wrenn 8946497  Agent:

MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

Attached documents:

Comment: MM3 - LPMM18/2413  Respondent: Joan Wrenn 8946497  Agent:

MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

The current draft of the Local Plan is unsound because:-

1. The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.
2. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
3. Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.
4. There is no policy dealing with urban areas beyond the town centre such as the one where we live.
5. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

Attached documents:

Comment: MM48 - LPMM18/1921  Respondent: Miss Fi Middleton 8946721  Agent:

I would like to object to the proposed south bound exit slip of the A3 proposed at West Clandon. I live on Clandon Road and the traffic going down that road is often exceeding the speed limit- especially on a Sunday when motorbikes are heading too and from new lands corner. They regularly drive at speeds of 60-70 mph along the 40 limit section. A slip road into the straight section of road would be a disaster. I have concerns regarding children crossing the road. Calls for speed cameras have not been heeded. We would need an average speed camera for that entire section. People would also use it as an escape route from the A3 as on a nightly basis the queues reach to before the burpham exit- casting increasing the volume of traffic, destroying the village further.

Attached documents:

Comment: MM45 - LPMM18/5026  Respondent: Gerry Armstrong 8947457  Agent:

I want to register my opposition to this development:

There has not been enough focus or thoughtful planning ideas for the development of Guildford town centre. Here is where true sustainable development should take place eliminating the need for car use as shops, public transport, entertainment etc would all be on the doorstep. It is crying out for better use of the existing space and some creative thinking. For example, just look at the underutilisation of North Street were tired and ugly architecture prevails and many of the shops are now closed. This area should be redeveloped with sustainable high density apartments that could be accommodated over retail space and designed to complement and enhance this area. More homes in the town centre would be beneficial to all and would help reduce traffic and relieve pressure for yet more development on the Green Belt.

The Flexford/Normandy site is in the green belt and Guildford Borough Council have not made clear the ‘exceptional circumstances’ that are needed to redraw the green belt boundary in this area. Previous applications to build on this site have been refused because of the damage that would be done to the openness of the green belt and the extreme sensitivity of this site. Local people have not been consulted and their views haven’t yet been taken into consideration.

This is a rural area and should remain so, please reject this proposal.

Attached documents:

Comment: MM13 - LPMM18/5985  Respondent: Patrick Sheard 8954977  Agent:

MM13 Retail Needs
The retail needs figures are revised to show an increase in net capacity to 2030 of 28,202 m². This flies in the face of all projected retail trends, in particular the increases in online shopping and shows the Council have not done a proper analysis of future requirements. They risk therefore sterilising land with unrealistic allocations and demands. The retail requirements should therefore be reduced.

Attached documents:

**Comment:** MM2 - LPMM18/5980  **Respondent:** Patrick Sheard 8954977  **Agent:**

**MM2** Policy S2 Planning for the Borough-our spatial development strategy

I object most strongly to the increase in housing numbers proposed to contribute towards Woking Borough Council’s unmet needs. The latest ONS projections released in September 2018 show a considerable reduction on the figures released earlier on which presumably this Plan is based. The difference between the latest and earlier figures risks rendering the whole Plan unsound and totally undermines the Council’s case for infringing on the Greenbelt. Rather than being increased, the overall housing need should be reset to a figure closer to the ONS projections say around 330 dwellings per annum which would still give the Council a contingency of 10% or so above the actual projected need of ca 300 households per year which would give the Council some breathing space for any years in which it fell short of its target.

Attached documents:

**Comment:** MM25 - LPMM18/5986  **Respondent:** Patrick Sheard 8954977  **Agent:**

**MM25** Policy D3 Historic environment

I object most strongly to the watering down of Policy Paragraph 2 which contradicts all the additional hoops and incurred costs which those living in Listed Buildings and Heritage Assets are obliged to go through / bear which according to the rewording will now be undermined by inappropriate development on adjacent land.

Attached documents:

**Comment:** MM41 - LPMM18/5989  **Respondent:** Patrick Sheard 8954977  **Agent:**

**MM41** Policy A43 Land at Garlicks’ Arch, Send March

This has increased from 400 to 550 homes, of which 450 are to be built in the first 5 years. This increase of 37% in the number of homes is excessive and if the outline plans shown at the Local Plan Examination are anything to go by will breach many of the other policies contained within the Local Plan regarding new sites reflecting the Local Character. It also ignores the 6000 plus objections to the previous proposal. The land is currently Green Belt and includes Ancient Woodland, which should have protected status under both the previous and current NPPFs and there would be no need for any incursion into the Green Belt were the Local Plan to be re-visited in light of the new housing requirements figures issued in September 2018 as outlined above.
The inclusion of this site seems to be driven by the Councils desire to expend the Bunt Common Junction with the A3 to a full four-way Junction which Highways England appear to be of the view cannot be delivered within the Safety Standards in their Manuals. Resolving this issue will render it impossible to deliver the proposed 450 houses within the first five years since otherwise the increased traffic on local roads will be intolerable and cost lives! The site is not suitable for housing local school and medical facilities will not cope.

**M41 Transport Strategy**

The Local Plan is proceeding with inadequate traffic modelling that understates the roads infrastructure requirements that will be generated by its excessive housing number and site selection.

**Attached documents:**

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**Comment: MM42 - LPMM18/5990  Respondent: Patrick Sheard 8954977  Agent:**

**MM42 Land at Burnt Common**

This proposal has increased from 7000 to 14800 sq m of industrial and storage facilities – this has been increased twice, having been previously deleted from the 2014 plan. It has now doubled the area. It is by far the largest new industrial allocation in any village. There is unused industrial capacity at Slyfield and the Send Business Centre so there is no need to site development land in the Green Belt. The Employment Land Needs Assessment showed a reduction in demand for industrial land, and this allocation is on top of a 25% increase proposed at Send Business Centre. There is more concentration of industrial units in Send than in any other village. The narrow village roads will not cope and this will affect air quality adversely.

**Attached documents:**

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**Comment: MM44 - LPMM18/5991  Respondent: Patrick Sheard 8954977  Agent:**

**MM44 Site at Aldertons Farm Send Marsh Road**

This new site for 120 homes was deleted from an earlier draft. It is a Green Belt site and no exceptional circumstances have been demonstrated; it is adjacent to an Ancient Monument and a collection of Listed Buildings which date back almost 600 years (of which Aldertons is one). Listed Buildings Permission is supposed to apply to their curtilage as well as the buildings themselves and whilst the sire may not be in the immediate curtilage of Aldertons it is certainly within the general curtilage thereof. Moreover, considering the revised figures issued by the ONS in September 2018, this site is unnecessary and as with the Garlick’s Arch Site, local facilities will not bear the increase in population implied. I object most strongly to the re-introduction of this site, and note that their was no detailed discussion of its inclusion allowed by the Inspector during the examination of the Local Plan.

**Attached documents:**

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**Comment: MM9 - LPMM18/5983  Respondent: Patrick Sheard 8954977  Agent:**
MM9 Policy P2 Green Belt

I welcome the statement that “The Metropolitan Green Belt, as designated on the Policies Map, against inappropriate development in accordance with the NPPF. Inappropriate development will not be permitted unless very special circumstances can be demonstrated. “ I would point out however that the revised ONS housing figures issued in September 2018, would allow Guildford Borough Council to avoid building on the Metropolitan Green Belt entirely!

Attached documents:

Comment: MM2 - LPMM18/1506  Respondent: Earl of Onslow and the Trustees of Onslow Estate 8957345
Agent: Nexus Planning (Adam Ross)

Introduction
These representations to the Guildford Borough Local Plan Main Modifications (“the Main Modifications”) are submitted on behalf of CEG, the Earl of Onslow and the Trustees of the Clandon Estate. They supplement the examination Statement submitted in May 2018 and respond specifically to the Main Modifications produced by Guildford Borough Council (“the Council”) in the light of the Inspector’s conclusion that the Council must allocate additional sustainable housing sites to deliver homes in the first five years of the Local Plan (following adoption).

These representations are also submitted further to the submission made to the Council on 31st July 2018 (Appendix 1) relevant to the suitability and deliverability of a scheme for 300 homes on the site we refer to as Land adjacent to Merrow Park and Ride but which is referred to as ‘Clandon Golf’ in the Council’s Sustainability Appraisal Addendum 2018 (for ease of reference we refer to the site as ‘Clandon Golf’ for the purposes of these representations). The information submitted to the Council in July, at the Council’s request, included:

1. a basic capacity plan which demonstrates, in accordance with the Council’s assumptions, that the area of land in question could, at an average density of approximately 29 dpa, deliver 300 homes utilising defensible boundaries formed by existing belts of vegetation which create eastern and southern boundaries (which could be strengthened further if required);
2. a ‘Transport and Highways Feasibility Note’ produced by Systra confirming that 300 homes could be delivered without any reliance on improvements to the A3; and
iii. a ‘Deliverability Statement’ that confirms that this site, which is in single ownership, benefits from an existing vehicular access and already has a developer and technical team on board, could deliver 300 homes by 2023/24 i.e. in the first 5 years of the Local Plan post-adoption.

Our objection to the Main Modifications, in summary, is that the suite of additional housing allocations proposed by the Council to increase housing delivery in the early years of the Local Plan is neither sustainable nor made in accordance with the Council’s own spatial hierarchy. Indeed, the Sustainability Appraisal Addendum 2018 (“the SA Addendum”) confirms that in addition to being a sequentially preferable site on the Council’s own terms (the Clandon Golf site is a Tier 8 option whereas the selected sites are, or should be, in the lowest and least sustainable category -Tier 10), the development options that include development at the Clandon Golf site score materially higher than the options that do not.

Having regard to the Council’s own evidence base and spatial strategy, the intention to allocate a suite of sites that excludes the Clandon Golf site is unjustified and, therefore, unsound. For the reasons explained in detail in these representations, the Council must re-consider its proposed housing allocations and, in accordance with the SA Addendum, allocate one of the three most sustainable development options – all options that include the Clandon Golf site.

MM2 (paragraph 4.1.9a)
Paragraph 4.1.9a as proposed to be amended states that ‘Guildford’s objectively assessed housing need has been based on a consideration of the latest 2018-based population projections.’

This is not correct.

The population projections that the Local Plan is now based upon are those published on 24th May 2018 but they are in fact 2016-based. The relevant statistical bulletin from the ONS is titled ‘Subnational population projections for England: 2016-based.’

Change Required

Amend paragraph 4.1.9a to identify that Guildford’s objectively assessed need for housing has been based on consideration of:

“...the ‘Subnational population projections for England: 2016-based.’”

MM2 (Table S2b)

Introduction

Table S2b sets out the spatial strategy distribution as amended following the proposed allocation of additional sites to deliver housing in the earlier years of the LP period (MM39, MM41, MM43, MM44 and MM45).

However, the revised table highlights the unsustainability of the Council’s proposed new allocations which exacerbate the extent of development proposed in the least sustainable locations within the Borough. This unsustainable distribution is unnecessary, unjustified and unsound given that the Council’s own evidence base identifies that there are more sustainable, deliverable, and sequentially preferable sites available such as that at Clandon Golf.

The representations to Table S2b focus on the spatial implications of the Council’s approach, its unsustainability and its lack of consistency with the Council’s own spatial hierarchy / approach – all of which make this modification unsound.

Unsustainable Housing Distribution

Table S2b confirms that 3,350 homes are proposed to be allocated as ‘Urban extensions to Guildford’. This equates to 31% of the total number being allocated (10,592 homes). This focus (as a minimum) on urban extensions to Guildford is wholly appropriate given that it is the county town of Surrey and, by some distance, the most sustainable location for development in the Borough (and indeed the sub-region). Urban extensions to Guildford are identified as Tier 8 in the Council’s Sustainability Appraisal Report Update 2017.

With the allocation of the additional sites as proposed by the Council in the Main Modifications, the level of housing now proposed in Tier 9 and 10 locations as identified in the Sustainability Appraisal Report Update July 2017 i.e. the least sustainable locations in the Borough, has now increased to 3,450 homes. This equates to 32% of the proposed number of housing allocations in the Borough.

Accordingly, it can be seen that there are now more homes proposed in the least sustainable locations in the Borough as are proposed at the sequentially preferable (based on the Council’s own evidence base / spatial hierarchy) and significantly more sustainable location as urban extensions to Guildford.

As set out in further detail later in our representations, this approach is unjustified, unnecessary and unsound given that there are acknowledged reasonable alternatives as urban extensions at Guildford (such as Clandon Golf) which the Council’s own evidence base confirms are deliverable, sustainable and sequentially preferable to those sites now proposed to be allocated.

Sustainability Appraisal Addendum September 2018

To inform the Council’s Main Modifications it instructed AECOM to produce an addendum to the original Sustainability Appraisal. As set out in paragraph 1.2.2 of that document, the aim is to:
‘…present information on the proposed modifications, and alternatives, with a view to informing the current consultation and subsequent plan finalisation.’

From a housing perspective the SA Addendum confirms that its purpose is to:
“…identify packages of sites to deliver 550 homes in the first five years of the plan period”.

In so doing it acknowledges that:

“First and foremost the strategy reflects an understanding that there is a hierarchy of places / potential growth locations within the Borough, and that a sequential approach to allocating development sites must be followed. In other words, capacity should be fully utilised at the most suitable sites (e.g. town centre sites), before moving down to the next tier in the hierarchy, and so on until a residual amount of growth is left to be delivered at sites in the bottom tier, namely village Green Belt sites, which tend to be less suitable for development.” (emphasis added)

In terms of providing for the additional housing required in the early years of the Local Plan (post-adoption), Table 6.1 of the SA Addendum confirms that it has identified seven potential housing package options for assessment. They are each a combination of various site options, and each option scenario would deliver between 550 and 650 homes in total.

Ultimately the Council’s chosen option, in terms of the package of new sites to be allocated, is Option 3 as identified in the SA Addendum – “Aaron’s Hill and small sites”. For clarity, the additional sites to be allocated are as follows:

- Land at Hornhatch Farm, Chilworth (MM43) – 80 homes
- Land at Aaron’s Hill, Godalming (MM39) – 200 homes
- Land east of Glaziers Lane, Flexford (MM45) – 105 homes
- Land at Alderton’s Farm, Send (MM44) – 120 homes

Whilst not a new site, the Council also proposes to increase the residential component of the existing allocation at Garlick’s Arch, Send Marsh.

In terms of the outcome of this SA Addendum, it states overtly at paragraph 7.2.1 that:

“The appraisal does not identify Option 3 as performing notably well in terms of any of the topic headings, but equally it is not identified as performing notably poorly in terms of any topic. It performs jointly least well in terms of two topic headings - ‘land’ and ‘brownfield’, but no major concerns are highlighted.” (emphasis added)

Indeed, this can be seen with reference to Table 6.1 of the SA Addendum which confirms that the Council’s selected option (Option 3) does not score as the best option against any of the identified topics.

In stark contrast to this, it can be noted from Table 6.1 of the SA Addendum that options that include the Clandon Golf site (Options 1, 4 and 7) score much better than the selected option. This is not particularly surprising given its highly sustainable location as an urban extension to Guildford.

More specifically with regard to the Clandon Golf site, the following can be noted in terms of the conclusions reached in the SA Addendum (as set out in the assessment tables on pages 57 to 73 of that document):

6. **Biodiversity** – Table 6.1 confirms that Option 4, which includes the Clandon Golf site, scores best against this topic assessment area. Options 1 and 7, which also include Clandon Golf, are ranked 2nd. With specific regard to the Clandon Golf site, the SA Addendum notes that:
   - “The outcome is that Clandon Golf does stand-out as the least constrained of the larger site options.”
   - “In conclusion, Option 4 (Clandon Golf + Small sites) performs best, including on the basis that it would lead to least concerns in respect of the SPA’.

7. **Climate change** – Options 1 and 2 are ranked joint first (Option 1 includes Clandon Golf) against this topic assessment area. Dispersal of development amongst smaller villages is not supported. With specific regard to the Clandon Golf site, the SA Addendum notes that it:
   - “…is approximately 3km from Guildford town centre, but Merrow Local Centre is approximately 1 km away. The site is adjacent to the Merrow Park & Ride from where there are frequent bus services into Guildford town
centre as well as advisory cycle lanes along the majority of Epsom Road between the town centre and the Park and Ride site, with opportunities for improvement.”

iii. Communities - Option 1 including Clandon Golf scores best against this topic assessment area. There is no specific commentary associated with the Clandon Golf site.

1. Economy – all options score equally against this topic assessment area with a conclusion that it “...is not possible to differentiate between the alternatives.”
2. Employment - all options score equally against this topic assessment area with a conclusion that “...the alternatives are judged to perform broadly on a par under this heading”.
3. Flooding - all options score equally against this topic assessment area with a conclusion that “...it is not clear that any of the sites give rise to significant flood risk concerns”.

vii. Health - all options score equally against this topic assessment area with a conclusion that “...it is not possible to differentiate the alternatives”.

viii. Historic Environment - Option 7 (which includes Clandon Golf) is ranked first against this topic assessment area. With specific regard to the Clandon Golf site, the SA Addendum notes that whilst it is adjacent to Clandon Park (a Registered Park and Garden):
• “...the potential for significant impacts is seemingly low given the intervening A25 dual carriageway and mature screening vegetation”.
• Whilst there are a cluster of listed buildings 350m to the west of the site “...direct impacts are not thought likely”.

1. Housing - Option 6 scores best against this topic assessment area. Options 3 and 7 (Option 7 includes Clandon Golf) are ranked second. The reason for this is identified as being that Option 6 would result “...in a good geographical spread of sites.”

We do not accept or understand the rationale for scoring Option 6 best in this regard, as the Council’s spatial strategy is not one of geographic dispersal but instead adopts a tiered, sequential approach which seeks to focus development in the most sustainable locations before moving to locations that are less sustainable. Accordingly, we do not accept that the scoring of the options against this topic is robust or consistent with the Council’s own spatial strategy.

1. Land - Option 7 (which includes Clandon Golf) scores best against this topic assessment area.
With specific regard to the Clandon Golf site, the SA Addendum notes that it is Grade 3b agricultural land (the lowest of all of the identified sites) but that unlike those other sites, Clandon Golf is (as its name would suggest): “...a golf course rather than land used for agricultural purposes.”
2. Landscape - Option 2 scores best against this topic assessment area. Options 1, 3, 5, 6 and 7 (Clandon is part of Options 1 and 7) are ranked second. With specific regard to the Clandon Golf site, the SA Addendum notes that whilst the site, on the Council’s evidence, is red-rated

Green Belt and in the AGLV (like the site at Aarons Hill which is a proposed allocation i.e. this is demonstrably not a show-stopper), the Landscape Character Assessment:
“...does not reference this golf course as a particular asset within the Merrow and Clandon Wooded Chalk Downs character area”.

xii. Poverty – all Options are scored equally against this assessment topic and the SA Addendum notes that “...there is no potential to differentiate the alternatives”.

xiii. Brownfield land - Options 4, 5, and 6 are equally ranked 1st against this topic assessment area (Option 4 includes Clandon Golf). There is no specific commentary with regard to the Clandon Golf site (or the majority of the other sites).

xiv. Rural Economy – all Options are scored equally against this assessment topic, with the SA Addendum concluding that “...it is not possible to differentiate the alternative with any certainty”.

1. Safer Communities – all Options are scored equally in this regard, with the SA Addendum noting that “...it is not possible to draw conclusions in relation to safety / security.”
xvi. **Transport** – Options 1, 2 and 7 are ranked joint 1st against this topic assessment area (Clandon Golf is part of Options 1 and 7). With specific regard to the Clandon Golf site, the SA Addendum notes that:

“Vehicle trips to/from Clandon Golf to/from the south...will pass through part of the Guildford section of the A3 which is due to be improved by the RIS1 Road Period 2 scheme. Those travelling to/from the north towards London and the M25 motorway will not generally be expected to use this section of the A3.”

xvii. **Water** – all Options are scored equally against this assessment topic, with the SA Addendum concluding that “...there is no potential to differentiate the alternatives.”

It is evident from the SA Addendum that the Clandon Golf site, and the development options that include it, generally score the best of those assessed. Indeed it can be seen from the SA Addendum summary conclusions (Table 6.1) that Options 1, 4 and 7 (that all include the Clandon Golf site) are ranked first against 7 of the identified 17 topic areas (see highlighted table at Appendix 1). The Council’s selected option (Option 3) is not ranked first against any of the identified topic areas.

It is evident from the SA Addendum that the Clandon Golf site, and the development options that include it, generally score the best of those assessed. Indeed it can be seen from the SA Addendum summary conclusions (Table 6.1) that Options 1, 4 and 7 (that all include the Clandon Golf site) are ranked first against 7 of the identified 17 topic areas (see highlighted table at Appendix 1). The Council’s selected option (Option 3) is not ranked first against any of the identified topic areas.

Whilst we accept that an SA process is not simply about adding up the results, it is evident that the options that score the best, when looked at in the round i.e. with the greatest number of / most significant positives, and the least number of / least significant negatives, are Options 1, 2 and 7. This is demonstrated visually on the bar chart at Appendix 2 where Options 1, 2 and 7 are the options with the most blue and orange colours (1st and 2nd rankings) and the fewest grey and yellow colours (3rd and 4th rankings).

In our view it is clear from the SA Addendum that of these Option 1 scores the best – “Clandon Golf and Aarons Hill”. This option has the greatest number of 1st rankings, the majority are 2nd rankings, it has very few 3rd rankings and no 4th rankings. The fact that Option 1 performs so well is not surprising, as the two sites included within it are those located in the most sustainable locations of those assessed as identified by the Council’s own spatial approach / hierarchy.

Against this evidential background, it is demonstrably unjustified and unsound for the Council to propose to proceed with an option which, as a matter of fact, allocates housing in the least sustainable locations in the Borough, and an option which identifies a suite of sites which score very poorly in the SA process.

**The Council’s Justification for Option 3**

As identified above, it is demonstrably the case that the SA Addendum does not support the selection of the Council’s chosen option (Option 3). Instead it very clearly supports an option that includes Clandon Golf (Options 1, 4 and 7). It is additionally the case that the Clandon Golf site, as a Tier 8 site identified in the SA Report Update 2017, is sequentially preferable to Aarons Hill and the smaller sites at the Green Belt villages (all Tier 10 and, therefore, the least sustainable locations in the Borough).

However, it is fair to note that the SA Addendum records (paragraph 5.2.9) that in some instances there can be a need to pass over allocating a site in one tier of the hierarchy in favour of allocating a more suitable site in a lower tier. Specifically, it records that relevant factors that could lead to such ‘leap-frogging’ include:

1. timescales for delivery;
   ii. constraints (AONB, SPA, heritage etc…)
   iii. reliance upon, or ability to facilitate provision of, essential infrastructure; and
   iv. policy constraint e.g. Green Belt sensitivity.

For the reasons expanded upon below, it is evident that none of these provide reasons not to allocate the Clandon Golf site.
Timescales for Delivery

As shown at Appendix 3, we provided the Council with information in July 2018 relating to the potential for housing delivery at the Clandon Golf site. As a site in single ownership, with a developer and technical team already in place and with a vehicular access already constructed, development can progress quickly. Our submission demonstrates how the site could realistically deliver 300 homes by 2023/24. This delivery timetable in not disputed by the Council.

It is evident, therefore, that timescales for delivery provide no reason to ‘leap frog’ the sequentially preferable site at Clandon Golf in favour of less sustainable sites.

Environmental Constraints

The SA Addendum is clear that the Clandon Golf site is not constrained by the AONB, nor is it adversely affected by matters such as impact on the SPA (indeed it scores best of all the sites in this regard), flooding, heritage or biodiversity.

Accordingly it is evident that environmental constraints provide no reason to ‘leap frog’ the sequentially preferable site at Clandon Golf in favour of less sustainable sites.

Infrastructure

As set out in our submission to the Council (Appendix 3), 300 homes at the Clandon Golf site can be delivered without any reliance on improvements to the A3. Furthermore, given the limited scale of development being proposed on the various sites, none are providing any wider infrastructure.

Accordingly it is evident that infrastructure matters provide no reason to ‘leap frog’ the sequentially preferable site at Clandon Golf in favour of less sustainable sites.

Summary

There is no evidential basis to support the Council’s selection of Option 3 as the most appropriate strategy for the delivery of additional homes in the early years of the Plan (post-adoption).

As set out above, the SA Addendum clearly supports the allocation of Options 1, 2 or 7. The Clandon Golf site falls within Options 1 and 7. As set out previously, options including Clandon Golf demonstrably score the best based on the Council’s own evidence. In addition Clandon Golf, as an extension to Guildford, is sequentially preferable to all of the alternatives based on the Councils own spatial hierarchy / approach.

Very unusually from our experience the SA Addendum, in outlining the reasons for selecting the preferred option (Option 3), distances itself totally from the decision ultimately made by the Council stating at paragraph 7.2.1 that:

“The following text was provided by the Council”

This is unsurprising as the conclusions of the SA Addendum fundamentally do not support the Council’s decision to take forward Option 3.

The SA process is there to inform decision-making, to ensure the delivery of sustainable development. It is also, importantly, there to provide clarity to third parties as to how decisions have been reached, and it is the fundamental evidence base document to demonstrate that a proposal is the most appropriate strategy i.e. justified and, therefore, sound.

In this instance the SA Addendum simply does not support the decision made by the Council in proposing to take forward Option 3.

In explaining why the Council is taking forward an option that is not supported by its own SA process, the Council states simply (SA Addendum paragraph 7.2.1) that it considers that the option it has chosen has ‘...strong delivery certainty’. However, as set out previously, neither the SA Addendum nor the Council itself in any other document suggests that an alternative option, which includes Clandon Golf, would provide any less delivery certainty. Indeed, to suggest so would be perverse given that it is a site in single ownership, with a developer and technical team on board, with a vehicular access already constructed and in a location where there is clear and strong market demand.
Against this background, the Council’s Main Modifications, which take forward the suite of additional housing sites in Option 3, are not consistent with its own evidence base or spatial hierarchy / approach, and are demonstrably unjustified and, therefore, unsound.

Re-categorisation of the Aaron’s Hill Site

In the SA Report Update 2017 that accompanied the submission draft Local Plan, the site at Aarons Hill is identified as falling within Tier 10 (Green Belt around villages) – the least sustainable locations in the Borough.

It is referred to as ‘Site H’ and described at paragraph 6.6.16 of that document.

In the SA Addendum 2018 (Table 5.1) the Council has re-categorised the Aarons Hill site, identifying it within Tier 8 i.e. the same category as urban extensions to Guildford. The only justification for this change is set out at footnote 15 of the SA Addendum where the Council identifies that Godalming, whilst falling within Waverley Borough, is considerably larger than any of the Green Belt villages within Tier 10. This is potentially a case for the Aarons Hill site being considered to be more sustainable than the other Tier 10 sites, but not for suggesting that it is equivalent in sustainability terms as urban extensions to Guildford.

The implications of this amendment are significant. Following the Council’s identified sequential approach / hierarchy, development opportunities in Tier 8 should generally be developed before opportunities in Tiers 9 or 10, as they are inherently more sustainable.

The categorisation of Aarons Hill (as an urban extension to Godalming) as comparable in sustainability / sequential terms to the Clandon Golf site (as an urban extension to Guildford) is wholly unjustified.

As identified in the Waverley Local Plan Part 1, Godalming has a population of approximately 22,000 (at 2011). It records that the size and range of services in Godalming are less than Farnham and that it is significantly influenced by Guildford, which is approximately 10km (6 miles) away via good road and rail links.

By contrast, Guildford is the county town of Surrey. The Guildford Local Plan notes that Guildford town had a population of 137,000 in 2011 i.e. it is 6 times larger than Godalming. The Guildford Local Plan also recognises that it is home to two universities, a world leading research institute, a number of UK and European business headquarters and a world class research park. The borough also has a vibrant retail economy of subregional importance.

There is no reasonable or logical basis on which it can be asserted that an urban extension to Godalming is as sustainable as an urban extension to Guildford.

By identifying the Aarons Hill site as being within Tier 8 i.e. the same as Clandon Golf the Council is unfairly and unreasonably favouring the Aarons Hill site in what should be a fair and transparent SA process. As a consequence, the Council’s revised approach is unjustified and therefore unsound, resulting in an unnecessary and unsustainable distribution of development.

Changes Required

For the reasons set out in detail above, the revised spatial strategy established by MM2 (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents: Main Modifications Reps Combined_Redacted.pdf (6.1 MB)
**Clandon Golf Course**

**Deliverability Statement**

1.0 **Introduction**

1.1 This short note supplements submissions made on behalf of CEG, the Earl of Onslow and the Trustees of the Onslow Estate to the Local Plan examination, where hearing sessions took place in June / July. Following these sessions the Inspector and Council agreed that the Council needed to make Main Modifications to the Plan that would, inter alia, allocate additional sites to deliver housing in the first 5 years of the Plan following adoption i.e. in the period 2019/20 to 2023/24.

1.2 Specifically, this note is provided to assist the Council in its consideration of the potential of the north western part of the Golf Course (referred to as ‘the Site’ for the purposes of this note), located adjacent to the existing Merrow Park and Ride and capable of accommodating approximately 300 homes, to deliver housing in the period to 2024.

2.0 **Availability**

2.1 The Site is in the single ownership of the Earl of Onslow / the Trustees of the Clandon Estate and is available for development.

2.2 The landowner has already engaged a developer (CEG) to bring land in this highly sustainable location forward for development. CEG has an excellent track record in delivering high quality residential developments on sustainably located greenfield sites at historic towns. By way of example these have recently included:

   1. Stamford, Lincolnshire – 400 homes
   2. Chichester, West Sussex – 500 homes

   iii. Thame, Oxfordshire – 400 homes

2.3 CEG has already appointed a full technical team who commenced work at the beginning of 2018.

3.0 **Delivery**

3.1 The development being considered (approximately 300 homes) is of a scale whereby it is realistic to assume that there would be two housebuilding outlets on site.

3.2 Against this background we summarise below a delivery timetable:

- Q4 2018 - Adoption of the Local Plan
- Q2 2019 - Submission of outline planning application
- Q1 2020 – Outline planning permission granted
- Q1 2020 – Submission of reserved matters
- Q3 2020 – Approval of reserved matters
- Q4 2020 - Discharge pre-commencement conditions
- Q2 2021 - Start on site

   **2021/22 – 60 homes**
   **2022/23 – 120 homes**
   **2023/24 – 120 homes**

**Total Housing Delivery by 2023/24 – 300 homes**
3.3 It can be noted that this is a similar (albeit more conservative) timetable to that put forward by the Council for the similarly sized site at Garlicks Arch promoted by a developer similar to CEG (see Appendix 4: Housing trajectory of the Council’s Topic Paper: Housing Delivery December 2017).

3.4 Of fundamental importance, the location of the Site and the scale of development proposed is such that the delivery of this housing is not reliant on the delivery of improvements to the A3.

3.5 As concluded in the attached technical note produced by Systra: “The number of trips associated with the sit, both onto the A3 and through its’ junctions is within normal expected daily variations in traffic flows on the route……Delivery of the site would be feasible early in the Plan period as the site will not be reliant on the delivery of any of the A3 improvement schemes.”

4.0 Suitability / Sustainability

4.1 Whilst not the primary purpose of this note the Council will be aware, having regard to its own evidence, that the Site is a suitable location for housing. Most notably, for ease of reference:

1. the Site it is situated immediately adjacent to the Guildford urban area, the principal settlement in the Borough;
2. extensions to Guildford are identified in the Sustainability Appraisal 2017 as ‘Tier 8’ in the Council’s sequential approach to development. Development of the Site, applying this sequential approach, is therefore preferable to any new settlement options or development of any Green Belt site options around villages;

iii. unlike most other unallocated sites which were clearly rejected as options by the Sustainability Appraisal 2017, the SA 2017 identifies the Site as a location where the allocation of development should be considered (SA 2017 page 30);

1. uniquely, the Site is located immediately adjacent to the existing Merrow Park and Ride, providing access to existing bus services to Guildford town centre which run every 15-20 minutes and take just 12-15 minutes;
2. the Site would complement and complete the Council’s proposed Sustainable Movement Corridor through Guildford (Figure 10.1 of the SA 2017), requiring only a simple southwards extension from the allocation at Gosden Hill that could terminate at the Merrow Park and Ride;
3. the Site relates well to the existing Guildford urban edge and is located within easy walking and cycling distance of a range of existing education, leisure, retail, employment and community facilities;

vii. the Site is located in close proximity to the proposed new rail station at Guildford East (Merrow), delivery of which is due to commence in 2024;

viii. the Site already benefits from planning permission (01/P/01627) for the construction of (an as yet unbuilt) clubhouse and health centre of 14,500 sqft

i.e. there is already precedent for built development on the Site;

1. appropriate SANG provision could be made; and
2. the Site is not countryside, with the land already significantly re-modelled / engineered and used as a golf course.
3. EXECUTIVE SUMMARY

1.1.1 This Transport & Highways Feasibility Note demonstrates that impact on the A3 of a potential 300 residential units located at the land adjacent to Merrow Park and Ride would be immaterial. The number of trips associated with the site; both onto the A3 and through its’ junctions, is within normal expected daily variations in traffic flows on the route, with a maximum of 58 additional vehicles anticipated (in the PM Peak hour). Delivery of the site would be feasible early in the Plan period as the site will not be reliant on the delivery of any of the A3 Improvement Scheme.

1.1.2 A large proportion of trips are expected to travel into Guildford Town Centre, and with the site located so close to the east of the town, there are ample opportunities to facilitate sustainable travel to and from the site, building upon the existing network which includes high quality walking and cycling links as well as an established Park & Ride providing regular direct and frequent services.
1.1.3 There are no transport reasons why the site should not be developed, at a reasonable timescale given the negligible impact on the A3 and the existing walking, cycling and public transport links which can be utilised to provide a sustainable development.

2. INTRODUCTION

2.1.1 This Transport & Highways Feasibility Note has been prepared by SYSTRA Limited on behalf of CEG, the Earl of Onslow and the Trustees of the Onslow Estate to demonstrate that development of approximately 300 residential dwellings could be successfully accommodated in transport terms on the part of the Clandon Golf Course site adjacent to Merrow Park and Ride, Guildford.

2.1.2 In particular this document demonstrates that the number of trips generated by a development of 300 residential units in this particular location would not have a material, let alone ‘severe’, impact on the existing operation of the A3, and therefore that the site could be delivered early in the Local Plan period without reliance on any forthcoming A3 Improvement Schemes.

2.1.3 The Note calculates the trips associated with a potential 300 dwelling development and calculates the number of vehicle trips that could be expected to use the A3.

Trip Generation

2.2.1 The potential vehicle trips generated by the site are provided in Table 1. The trip rates have been taken from the ‘Study of Performance of A3 Trunk Road Interchanges in Guildford Urban Area to 2024 Under Development Scenarios (April 2018)’ document; referred to hereafter as the ‘A3 Study of Performance’ which was prepared by Mott MacDonald and commissioned by Guildford Borough Council (GBC).

2.2.2 The highest recorded trip rates within the A3 Study of Performance; ‘Neighbourhood Centre, Mixed Private/affordable housing’ (Table 11: vehicle Trip Rates) have been used at this stage to provide a robust assessment of the potential impacts on the A3.

![Table 1: Trip Generation (300 Units)](image)

<table>
<thead>
<tr>
<th>Trip Generation</th>
<th>AM Peak (0600-0900)</th>
<th>PM Peak (1700-1800)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Arrivals</td>
<td>Departures</td>
</tr>
<tr>
<td>Neighbourhood Centre</td>
<td>0.117</td>
<td>0.339</td>
</tr>
<tr>
<td>Trip Generation (300 Dwellings)</td>
<td>35</td>
<td>99</td>
</tr>
</tbody>
</table>

2.3 Trip Distribution

2.3.1 Analysis of Census 2011 Journey to Work (JTW) data for the ‘Guildford 011’ MSOA has been undertaken, with the percentage distribution also compared to the A3 Study of Performance to ensure a consistent approach. The use of JTW figures are useful as this represents one of the main trip purposes during the AM and PM peak periods. A summary of the distribution of traffic is demonstrated in Appendix A with distribution diagrams contained in Appendix B.

2.3.2 The data indicates that the vast majority of JTW trips (92.9%) would travel west from the site, with 7.1% turning east. A summary of the key destinations and resultant trip generation is demonstrated in Table 2.
2.3.3 The data shows that 21.4% of trips would continue into Guildford Town Centre, with 7.5% travelling south along the A281 towards the south of Guildford (including Godalming, Dunsfold, Alford Crossways and Shalford). 4.6% of traffic would travel west along the A31 Farnham Road towards destinations including Farnborough, Aldershot and Farnham, and 10.2% of traffic would travel north across the A3 towards north Guildford, including to the Slyfield Industrial Estate, Jacobs Well and Woking.

2.3.4 Based on the above, as an estimate just 36.4% of total JTW trips would enter the A3 (29.5% travelling northbound towards the M25 and London and 6.9% travelling southbound towards the south coast). A further 16.5% of traffic would cross the A3, which would be distributed between the six key junctions around Guildford and would be dispersed in terms of traffic impact at key individual junctions.

Traffic Impact on A3

2.4.1 Of the total trips in the AM Peak period, applying the percentages in the Table above, just 39 vehicles would be expected to travel to / from the north on the A3, with 10 vehicles expected to travel to/from the south. Of the southbound trips, 7 would exit at The Chase junction towards the Surrey Research Park & Hospital and would therefore exit the A3 within two junctions. In the PM Peak period, a total of 47 vehicles would be expected to travel to/from the north on the A3, with 11 vehicles travelling to/ from the south. Of the Transport & Highways Feasibility Note (300 Units) Land Adjacent to Merrow Park and Ride southbound trips, 7 would exit at The Chase junction towards the Surrey Research Park & Hospital.

2.4.2 Appendix C provides an extract from the Highways England (HE) daily traffic report on the A3 at Guildford (link between A3100 and A320) for the month of March 2018. From this, a neutral week has been analysed over a 7-day period (Monday 12th March 2018 to Sunday 18th March 2018) to establish an average hourly flow on this link. 6,491 two-way vehicles in the AM Peak period and 6,631 two-way vehicles in the PM Peak period are shown, with 72,346 two-
way movements across a 12-hour day. This count provides a useful guide as to the level of peak hour flows on the A3; although it is accepted that there will be some variation in traffic flows on the A3 between different junctions.

2.4.3 Table 3 provides a summary of the base traffic movements on the A3 and the percentage impact of potential Clandon related development traffic on this link.

| Table 3: Summary of Highways England Data and Percentage Impact of Potential Development |
|---------------------------------|----------------|----------------|
|                                  | AM Peak period (0600-0900) | PM Peak period (1700-1800) |
| Highways England A3 at Guildford Traffic Count | 6,401 | 6,581 |
| Trip Generation (300 Dwellings) onto A3 | 39 | 47 |
| Total Flow with Development Traffic | 6,540 | 6,628 |
| Percentage impact | 0.6% | 0.7% |

2.4.4 With a percentage impact of just 0.6% in the AM Peak period and 0.7% in the PM Peak period, Table 3 demonstrates that the addition of development traffic onto the A3 is clearly marginal, and can be considered well-within the daily variation in traffic flows that would be expected for a trunk road of this nature.

2.5 Traffic Impact on A3 Guildford Junctions

2.5.1 The development will not have a material impact on the A3 as noted above. The junctions leading onto the A3 include the A247 junction, the Clay Lane Junction, the Stoke Junction, the Dennis Junction, the A31 Farnham Road Junction and the Hospital and Cathedral Junction.

2.5.2 Of the traffic which is expected to enter/exit the site, a total of 22 vehicles in the AM Peak period and 25 vehicles in the PM Peak period are anticipated to travel over the A3 to the aforementioned destinations to the north and west of Guildford. Whilst using the A3 junctions, these movements will not be required to enter or exit the A3 directly.

2.5.3 The distribution of traffic means that the 22-25 vehicles will be distributed between the six aforementioned major junctions along this route, and therefore the impact at each junction will be immaterial (for example a maximum of 16 additional movements over an hour at the Clay Lane Junction).

2.5.4 Based on the trip generation and distribution patterns the impact of development traffic at each of the junctions along this route is anticipated to be marginal, and well within the normal, expected daily variation of traffic flows.

Summary

2.5.5 It is reported that the A3 currently experiences high volumes of traffic and periods of congestion at a number of junctions along the Guildford corridor. With such a small volume of traffic calculated to be travelling on or across the A3 from a 300 dwelling development on land adjacent to Merrow Park and Ride it is evident that the effect of development traffic from this site would not have a material impact on the existing operation of the A3, nor any of the junctions accessing onto it. Therefore, this development would be in a valuable position to be delivered in the early stages of the Local Plan, in advance of any planned A3 improvements and would not be dependent on Wider their delivery.

2.6 Wider Traffic Impact

2.6.1 Of the development traffic, 21.4% is anticipated to travel into Guildford Town Centre, with an additional 7.5% travelling through the centre to access the A281 to the south. The total of 28.9% of traffic equates to 39 vehicles in the AM Peak period and 46 vehicles in the PM Peak period.

2.6.2 A total of less than one additional vehicle a minute in the AM and PM Peak periods demonstrates again that the development impact on Guildford Town Centre would be marginal, and within expected daily variations in traffic flows.
2.6.3 It is extremely important to take into account this development’s location in respect of sustainable access for all modes of travel. Located to the east of the town centre and the existing residential area (just 4km from the heart of Guildford) any vehicles travelling into/out of Guildford would not need to travel on, or via the junctions of the A3 and would therefore not have an impact on the A3, or any of the junctions along its route. Further evidence that the delivery of the site is not dependent on any A3 planned Improvement Schemes.

2.6.4 The location of the site immediately to the east of the existing settlement of Guildford also provides an alternative to the A3 for northbound traffic, should the A3 Improvement Schemes cause temporary congestion along this route. The alternative is the A25/A246 route on which the site is located, which allows direct access to London and the M25, through East Horsley, Effingham, Great Bookham, Fetcham and Leatherhead.

2.7 Sustainability

2.7.1 The site is located approximately 4km to the east of Guildford Town Centre, and 1km to the east of Merrow Local Centre. The site’s location means that travel by sustainable modes is a realistic alternative to the private car. The proximity to Guildford means that travel to/from the town centre can be undertaken by a variety of modes; all of which are direct, safe and well established and do not require crossing the A3 (or any other major roads).

2.7.2 Being on the A25 and located immediately adjacent to the established Merrow Park & Ride, the site is already well connected by way of existing bus links. Buses from Merrow Park & Ride run every 15-20 minutes between 07:30 and 19:20, and travel directly into the centre of Guildford taking just 12-15 minutes. Buses are also available to Clandon Station, taking just three minutes, with ample walking & cycling opportunities also available. A summary of the local walking, cycling and public transport opportunities is demonstrated in Figure 1.

2.7.3 There are significant and comprehensive opportunities to encourage walking and cycling into the town centre, as well as to Merrow’s local centre without significant investment in the existing road network to accommodate such facilities. This aligns with the focus of the Guildford Town and Approaches Movement Study (March 2015), which strategy includes:
- Comprehensive network of walking and cycling routes including improved routes to the rail station;
- Pedestrian facilities, improved crossings, shared surfaces;
- Cycle parking and bike sharing/ cycle hire schemes;
- Park and Ride facilities.
2.7.4 The site is suitably sustainable to encourage walking, cycling and public transport travel without reliance on the private car; particularly for journeys into Guildford Town Centre and local facilities.

Attached documents: Main Modifications Reps Combined_Redacted.pdf (6.1 MB)

Comment: MM27 - LPMM18/1508  
Respondent: Earl of Onslow and the Trustees of Onslow Estate 8957345
Agent: Nexus Planning (Adam Ross)

**MM27 – Policy para (2)**

We agree with and support the proposed change at MM27 which identifies the potential need for a Local Plan Review in the event of material delay of anticipated RIS schemes in the Borough. Given the significant uncertainties in terms of both the funding for and timing of such key strategic road improvements, and notwithstanding the requirement of paragraph 33 of the NPPF 2018 which requires that Local Plans are reviewed no later than 5 years from the adoption date of the Plan, we consider that the Council is right to specifically acknowledge that material delays in the delivery of RIS 1 schemes should in any event specifically trigger a review of the Local Plan.

Attached documents:

Comment: MM39 - LPMM18/1510  
Respondent: Earl of Onslow and the Trustees of Onslow Estate 8957345
Agent: Nexus Planning (Adam Ross)

**MM39 – Land at Aaron’s Hill, Godalming**

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

As also identified in our representations to MM2, it is also unjustified and unsound to re-categorise the Aarons Hill site from Tier 10 (as it was in the SA Report submitted with the Local Plan) to Tier 8 in the SA Addendum. This illogically and unjustifiably suggests that this urban extension to the small town of Godalming is as sustainable as an urban extension to Guildford (which is 6 times larger and the county town of Surrey) and results in this site being inappropriately favoured in the SA assessment process. Importantly, it results in the unnecessary allocation of this site at the expenses of the significantly more sustainable option at Clandon Golf.

**Changes Required**

For the reasons set out in detail in our representation to MM2, the revised spatial strategy (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).
Comment: MM43 - LPMM18/1511  Respondent: Earl of Onslow and the Trustees of Onslow Estate 8957345  
Agent: Nexus Planning (Adam Ross)

**MM43 – Land at Hornhatch Farm, Chilworth**

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

**Changes Required**

For the reasons set out in our representations to MM2, the revised spatial strategy established by MM2 (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents: Main Modifications Reps Combined_Redacted.pdf (6.1 MB)

Comment: MM44 - LPMM18/1513  Respondent: Earl of Onslow and the Trustees of Onslow Estate 8957345  
Agent: Nexus Planning (Adam Ross)

**MM44 – Land west of Alderton’s Farm, Send**

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

**Changes Required**

For the reasons set out in detail in our representation to MM2, the revised spatial strategy (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).
Comment: MM45 - LPMM18/1515  Respondent: Earl of Onslow and the Trustees of Onslow Estate 8957345  
Agent: Nexus Planning (Adam Ross)

MM45 – Land between Glaziers Lane and Strawberry Farm, Flexford

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

Changes Required

For the reasons set out in detail in our representation to MM2, the revised spatial strategy (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents:  Main Modifications Reps Combined_Redacted.pdf (6.1 MB)

Comment: MM1 - LPMM18/17  Respondent: Miss Hazel Cleasson 8957441  Agent:

Agree with the changes

Attached documents:

Comment: MM22 - LPMM18/20  Respondent: Miss Hazel Cleasson 8957441  Agent:

The Blackwell Farm site will encroach on AONB and SSSI areas. The amount of building proposed is likely to upset the water table causing flooding - down hill in Wood Street village and Fairlands village

Attached documents:

Comment: MM6 - LPMM18/19  Respondent: Miss Hazel Cleasson 8957441  Agent:
Affordable to local people properties should be built before rather than after other more expensive dwellings. Truly suited to first time or down sizers.

Attached documents:

**Comment:** Other comments - LPMM18/18  **Respondent:** Miss Hazel Cleasson 8957441  **Agent:**

Feel the proposed housing numbers for the Guildford area are still too high. Also would like to see any and all gypsy sites proposed should be open to all “types” of travellers not limited to one particular group as this is discrimination and should not be encouraged

Attached documents:

**Comment:** MM36 - LPMM18/2122  **Respondent:** Mo Usher 8957953  **Agent:**

Please can you REVIEW Policy A26 in the light of the latest ONS housing figures and amend the Local Plan to take into account the new lower figures especially with regard to Blackwell Farm which adjoins the Surrey Hills AONB and is Green Belt in an area, which is already severely congested with traffic with a hospital and business park.

There is now a strong case for taking out a strategic site to enable town centre provision and better use of brownfield sites. This makes table S2b out of date and MM3 inadequate and in need of re-examination.

I OBJECT to the addition of Policy 26A (Blackwell Farm Access Road) as this development should not be going ahead for the above reasons.

Thank you for responding to my request.

Attached documents:

**Comment:** MM37 - LPMM18/3445  **Respondent:** University of Surrey (Sir or Madam) 8967233  **Agent:** Terence O'Rourke (Steve Molnar)

Guildford Borough Local Plan
Main modifications

**Comments on behalf of the University of Surrey**

**Main modification reference:** MM37

The University of Surrey welcomes MM37 that provides a new policy A26a and a more extensive area of search for the provision of the access road from the A31 to serve the Blackwell Farm allocation (A26). This satisfies the objection by the University to the previous narrow corridor for the route of such a road, and will provide scope for a more appropriate way forward in detailed design of a successful access taking account of the local context.
We note that item 4 of the requirements under the policy states that:

"The objective will be to achieve the best landscape and design solution, taking into account the topography, the existing trees, the need for additional landscaping, and the needs of all users, including walkers and cyclists as well as vehicles entering and leaving the site."

We consider that the wording that the objective is to achieve the "best" landscape and design solution opens up the possibility of uncertainty over what this represents. This is because the term "best" is potentially value laden with differing perspectives, and could lead to difficulty in reaching agreement.

The term "an appropriate" landscape and design solution, taking into account the matters mentioned, would be preferable as it leaves scope for the planning authority to decide what is appropriate rather than what is "best". This is a more realistic and deliverable task whilst still ensuring that the relevant factors, as listed in the policy, are taken fully into account in arriving at an appropriate solution.

Attached documents:

**Comment:** MM13 - LPMM18/4339  **Respondent:** WAAG (Wisley Airfield Action Group) 8968961  **Agent:**

MM13 retail needs

The retail needs figures are revised to show an increase in net capacity to 2030 of 28,202 m². This is hopelessly optimistic given retail trends, in particular the increases in online shopping. They risk therefore sterilising land with unrealistic allocations and demands. The retail requirements should therefore be reduced as proposed by the Guildford Society/Guildford Vision Group

Attached documents:

**Comment:** MM2 - LPMM18/4337  **Respondent:** WAAG (Wisley Airfield Action Group) 8968961  **Agent:**

**OBJECTIONS REPRESENTATIONS ON THE MAIN MODIFICATIONS PUBLISHED IN SEPTEMBER 2018**

A general difficulty with the modifications is that no justification is put forward as to why the modification has to be made. A main modification may only be made if the plan as submitted is unsound and the modification is required to make it sound. It is not apparent why most of the modifications might be thought to be required to address a soundness failure, let alone to evaluate whether they are.

The Sustainability Appraisal Report Addendum does not address many of the changes: it might not need to, but does mean that the case for them is not made.

**MM2  Spatial development strategy and housing numbers**

The housing requirement should be calculated from the starting point of the latest, September 2018, ONS projections rather than the projections released earlier in 2018. These reduce the net increase in households on those projections from 420 per annum to 325 per annum.

The Main Modifications base the housing requirement on an adjustment for employment growth taking the increase to 606 dwellings per annum and a further 23 dwellings per annum for students. This led to the 630 dpa total for Guildford’s needs in the Main Modifications, with an additional 42 pa for unmet need from Woking. Calculations have varied for the
effect of the employment alteration. The NMSS figure was 460 as against the GL Hearn 606 total. The reduction in the projections will significantly affect the total after employment growth. We understand that the GL Hearn calculations would have to go down to about 480-490. If the current student adjustment was made, the Guildford need figure would, on the Council’s calculations, be 500-515, a reduction of 115 to 130 per annum. Over the plan period this would be a reduction of 2200 to 2500 dwellings. The unmet need from Woking should also be reduced.

The housing requirement figures should therefore be adjusted downwards.

This reduces the case for Green Belt releases and there are not the exceptional circumstances which are necessary to support all of the sites. Fewer Green Belt sites ought therefore to be released, with the unsustainable site of Former Wisley Airfield the first to go.

We note that the Inspector has sought the Council’s views on those ONS figures (ID/10), but given their significance ought to be asking the examination participants more generally for their views.

As is discussed below, the retail requirements are unrealistically high, in particular for comparison shopping. More urban land is therefore available for housing development. Since more comparison shopping takes place online, town centres are under pressure and so need a more locally based source of demand. An increase in the residential population of Guildford Town Centre will help the town centre retailers, in particular convenience retailing, A2 services and A3 to A5 food and beverage uses. The housing numbers proposed for the town centre of 863 are considerably below what the town centre is able to accommodate. By increasing pressure on the Green Belt the plan is unsound as not being consistent with national policy. The Town Centre housing figures should be increased to 3,500 and policies put in place to manage that growth.

**Comment:** MM2 - LPMM18/4341 **Respondent:** WAAG (Wisley Airfield Action Group) 8968961 **Agent:**

**MM2 - 4.1.11 and modifications Appendix 1 Housing trajectory**

The revised housing trajectory projects the first homes coming from the Former Wisley Airfield in 2022/23. However the M25 Junction 10 works are said to need to be completed before any units can be occupied at the site. Given the delays to the Junction 10 project, the trajectory is unrealistically optimistic. The Wisley site is highly unlikely to make any contribution to the five year supply.

**Attached documents:**

**Comment:** MM23 D1 Removal of sustainability expectations

The important expectations on developments of 25 dwellings or more in D1(2) are removed without any justification. The submitted text provided a series of requirements which met the social dimension of sustainable development in national policy. As submitted, the text is sound and so cannot be changed at this stage.

The replacement text is less precise, for example, on community interaction, walking distances, active lifestyles, routes to nearby areas for pedestrians and cyclists.

**MM23 D1 para 13-15 Masterplan for fWA**

The masterplans proposed suffer from two main defects:

(i) They are produced by and approved by the developer. They do not have the status of supplementary planning documents or other local development documents and are not approved by the local planning authority. If the Council does not agree with them, it can do nothing. Notwithstanding that, para 17 requires planning applications to be consistent with the masterplans, so in those respects is determining the acceptability of the developer’s own application on its compliance with the developer’s own masterplan. That is allowing the developer to mark his own homework.
Developers can get masterplanning very badly wrong, as the Former Wisley Airfield appeal decision demonstrated.

(ii) The masterplans are required to respond to very vague criteria in para 16. Those are much less precise and useful than the expectations in the submitted D1(2). Almost any scheme could, in a developer’s eyes, meet para 16, even if it was a failure.

37 Policy D4 Deletion

The submitted policy D4 is sound and there is no rational basis upon which it could be unsound. No amendment is therefore justified.

Whilst some elements are incorporated into the main modifications for D1, other details such as (1)(d) ‘e street patterns, spaces around buildings, layout, grain, scale, massing, proportions, height and materials of surrounding buildings’ are omitted from the proposed text

Attached documents:

Comment: MM40 - LPMM18/4342  Respondent: WAAG (Wisley Airfield Action Group) 8968961  Agent: 53 MM40 Quality requirements for FWA

Apart from the wastewater requirements, the changes lack any rationale or benefit. The condition of the SNCI will be inevitably compromised by the development itself. Moving references to unique places and unique context from opportunities to requirements is no doubt intended to strength the expectations, but involves turning a very vague expectation into a similarly vague requirement.

Attached documents:

Comment: MM50 - LPMM18/4343  Respondent: WAAG (Wisley Airfield Action Group) 8968961  Agent: 60 MM47 Map Amending SNCI Former Wisley Airfield

The amendment drastically reduces the size of the site of nature conservation importance at the Former Wisley Airfield. However the ecological interest of the land still merits SNCI designation. The published SNCI designation is sound and there is no justification for changing it.

The change appears to be to facilitate the new settlement. However SNCI designation depends upon the merits of the land rather than desires to develop it. Policy ID4(6) sets out the test to be applied to weigh any benefits of a scheme against the harm to a SNCI. It is not there to be bypassed by the removal of SNCI designations because land is allocated for development or SANG.

In summary these objections and issues could largely be overcome by first removing the least acceptable site A35 from the draft Local Plan and working up to minimise any greenbelt removal requirements.

Attached documents:
Comment: MM9 - LPMM18/4338  Respondent: WAAG (Wisley Airfield Action Group) 8968961  Agent:

MM9  Limited infilling impact on Ockham

The modification is a weakening of the protection of the countryside, changing the site being ‘as a matter of fact within the village’ to ‘should be considered to be’. The new text has a prospective element to it – how the village ought in the future to be perceived rather than how it presently is.

In the context of a very diffused settlement such as Ockham, it is difficult to identify what is within the village at present, let alone what should be considered to be. The proposed modification would bring an uncertain, but potentially large, area into possible ‘infill’ development.

The Sustainability Appraisal Report Addendum asserts that there is ‘a considerable re-write of the policy; however, this is presentational, i.e. there is no change in policy approach’ (para 9.11.3). Firstly there is a change in the policy and either way the current text is not unsound. A presentational re-write cannot be addressing a failure of a plan to be sound.

Attached documents:

---

Comment: MM2 - LPMM18/371  Respondent: Dr Graham Hibbert 8970785  Agent:

I wish to make the following comments on two aspects of the proposed changes to the Local Plan:

MM2

The final Local Plan must take into account the revised ONS population profile which reduces the housing need for Guildford. The number of dwellings required should be revised downwards to 460 per annum. This figure is made up of 400 per annum - as has now been agreed by G L Hearn - plus 60 per annum to take account of the ambitious growth forecast by the Inspector.

All possible constraints should be applied to prevent building on the Green Belt, particularly bordering an AONB.

Attached documents:

---

Comment: MM2 - LPMM18/5046  Respondent: Dr Graham Hibbert 8970785  Agent:

I have briefly written to you before to comment that in view of the new local population and household projects, the housing target in the Draft Local plan should be reduced. I have since had the opportunity to review the proposed amendments to the Local Plan in more detail and make the following additional comments.

Policy MM2 - As I have previously stated, the Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

...  

Policy MM2 – I would ask the Council to reconsider the need for all the current strategic sites and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination. More dwelling sin the town centre will help it to live at night and be a more attractive place to visit for entertainment and relaxation purposes.
Policy MM2 - Expert Neil MacDonald, hired by the GRA, has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation. It has undermined people’s trust in the Council that the logic behind the Council’s agents who developed their assessment of the OAN has not been made more open.

Policy MM2 - It is just wrong to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined,

Attached documents:

Comment: MM23 - LPMM18/372  Respondent: Dr Graham Hibbert 8970785  Agent:

MM23
The exemption for strategic sites from the need to respond to distinctive local character is potentially worrying. Guildford’s particular character as an historic market town must be preserved.

Attached documents:

Comment: MM23 - LPMM18/5048  Respondent: Dr Graham Hibbert 8970785  Agent:

Policy MM23 - In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

Policy MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

Policy MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

Policy MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM3 - LPMM18/5047</th>
<th>Respondent: Dr Graham Hibbert 8970785</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy MM3 - In (5) new town centre development should avoid adverse impact on surrounding residential areas.</td>
<td></td>
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<tr>
<td>Policy MM3 - There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM31 - LPMM18/5052</th>
<th>Respondent: Dr Graham Hibbert 8970785</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Policy MM3 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.</td>
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<td>...</td>
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<tr>
<td>Policy MM31 A height limit for North Street is required.</td>
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<tr>
<td>Policy MM31 Where is the allocation for an all-direction bus interchange?</td>
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<td>Attached documents:</td>
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<th>Comment: MM32 - LPMM18/5055</th>
<th>Respondent: Dr Graham Hibbert 8970785</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Policy MM32 A height limit for White Lion Walk is required.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM33 - LPMM18/5059</th>
<th>Respondent: Dr Graham Hibbert 8970785</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Policy MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.</td>
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<td>Attached documents:</td>
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| Comment: MM35 - LPMM18/5060 | Respondent: Dr Graham Hibbert 8970785 | Agent: |
Policy MM35 Should Gosden Hill be retained as highly effective Green Belt along the A3 and removed from the Plan? Revised housing need figures weaken the justification for development.

... Policy MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

**Attached documents:**

**Comment: MM36 - LPMM18/5061  Respondent: Dr Graham Hibbert 8970785  Agent:**

Policy MM36 Should Blackwell Farm be retained as Green Belt, which also protects views from the AONB along the Hogs Back, and removed from the Plan? Revised housing need figures weaken the justification for development.

**Attached documents:**

**Comment: MM37 - LPMM18/5062  Respondent: Dr Graham Hibbert 8970785  Agent:**

Policy MM37 The proposed land for an access road between the A31 and Blackwell Farm would harm the AONB.

**Attached documents:**

**Comment: MM13 - LPMM18/2067  Respondent: Tim J. Harrold 8971233  Agent:**

MM13

+There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (eg online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing.

**Attached documents:**

**Comment: MM2 - LPMM18/2065  Respondent: Tim J. Harrold 8971233  Agent:**

FORMAL WISLEY AIRFIELD, OCKHAM : POLICY A35

GENERAL OBJECTION

MM2
The housing target is wrong. CPRE is requesting the Inspector to reopen the hearing so that the latest ONS figures and household projections can be taken into account.

There should be no requirement for Guildford to take Woking’s unmet need, particularly as this will require further Green Belt release.

Guildford Borough Council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield sites before moving to land in the villages or Green Belt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on the Portsmouth Road in Ripley that has not been properly considered.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2- LPMM18/2074</th>
<th>Respondent: Tim J. Harrold 8971233</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>POLICY A61 LAND AT AARON’S HILL, GODALMING : MAIN MODIFICATION MM36 &amp; MM2</td>
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<tr>
<td>CPRE objects to this development proposal for 200 houses within the Pilgrims Ward of Guildford.</td>
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<tr>
<td>We have asked in our submission for the Inspector under MM2 to reopen the current examination to take account of the new lower population and household figures for Guildford and Waverley that have recently been produced by the Office for National Statistics. CPRE has worked closely in this context with the leading national expert Neil MacDonald both in Waverley District and in collaboration with the Guildford Residents Association (GRA) in Guildford.</td>
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<tr>
<td>We are opposed to the Aaron’s Hill development proposals made for both sides of the Waverley/Guildford boundary which total 462 houses. It is clear to us that housing on a scale of 200 dwellings in Guildford District will result in adverse traffic congestion implications for the local road network and in particular Eashing Lane. It seems likely that there would be a substantial increase in vehicles seeking to reach the A3 and beyond on a daily basis. This could be very damaging to the small hamlet of Eashing with its ancient medieval bridge and community of attractive houses.</td>
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<tr>
<td>The submission of Shackleford PC (SPC) makes it clear that Aaron’s Hill is currently protected as Green Belt and as part of an Area of Great Landscape Value (AGLV). It is intended that a review of the boundary of the nationally important countryside within and adjoining the Surrey Hills Area of Outstanding Natural Beauty (AONB/AGLV) in this area is to be made once the current study by Natural England of the Suffolk Coastal AONB has been completed. The proposed site is described by the SPC as “manifestly unsuitable for such a large-scale development” especially if the 262 homes proposed for Waverley District go ahead as well. Neither proposed settlement is consistent with the National Planning Policy Framework (NPPF). Development of the Green Belt is only permitted in “exceptional circumstances” that in our view should not be considered relevant in the current situation.</td>
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<tr>
<td>We are informed that the Leader of Guildford Council attended SPC’s July meeting at which Ashill was also present and stated that GBC did not believe that the site was suitable for a large development which would be harmful to the area. We fully endorse the comments subsequently made by SPC in their submissions to GBC dated 30th August and 22nd October. We therefore urge that this proposed development be refused.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM3- LPMM18/2069</th>
<th>Respondent: Tim J. Harrold 8971233</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>S3</td>
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</table>
The Town Centre policy is inadequate and does not address the infrastructure deficit. There is too much reliance on A3 improvements at Guildford which are beyond the Council’s control and have no fixed timescale.

Attached documents:

Comment: MM36 - LPMM18/2073  Respondent: Tim J. Harrold 8971233  Agent:

POLICY A61 LAND AT AARON’S HILL, GODALMING : MAIN MODIFICATION MM36 & MM2

CPRE objects to this development proposal for 200 houses within the Pilgrims Ward of Guildford.

We have asked in our submission for the Inspector under MM2 to reopen the current examination to take account of the new lower population and household figures for Guildford and Waverley that have recently been produced by the Office for National Statistics. CPRE has worked closely in this context with the leading national expert Neil MacDonald both in Waverley District and in collaboration with the Guildford Residents Association (GRA) in Guildford.

We are opposed to the Aaron’s Hill development proposals made for both sides of the Waverley/Guildford boundary which total 462 houses. It is clear to us that housing on a scale of 200 dwellings in Guildford District will result in adverse traffic congestion implications for the local road network and in particular Eashing Lane. It seems likely that there would be a substantial increase in vehicles seeking to reach the A3 and beyond on a daily basis. This could be very damaging to the small hamlet of Eashing with its ancient medieval bridge and community of attractive houses.

The submission of Shackleford PC (SPC) makes it clear that Aaron’s Hill is currently protected as Green Belt and as part of an Area of Great Landscape Value (AGLV). It is intended that a review of the boundary of the nationally important countryside within and adjoining the Surrey Hills Area of Outstanding Natural Beauty (AONB/AGLV) in this area is to be made once the current study by Natural England of the Suffolk Coastal AONB has been completed. The proposed site is described by the SPC as “manifestly unsuitable for such a large-scale development” especially if the 262 homes proposed for Waverley District go ahead as well. Neither proposed settlement is consistent with the National Planning Policy Framework (NPPF). Development of the Green Belt is only permitted in “exceptional circumstances” that in our view should not be considered relevant in the current situation.

We are informed that the Leader of Guildford Council attended SPC’s July meeting at which Ashill was also present and stated that GBC did not believe that the site was suitable for a large development which would be harmful to the area. We fully endorse the comments subsequently made by SPC in their submissions to GBC dated 30th August and 22nd October. We therefore urge that this proposed development be refused.

Attached documents:

Comment: MM37 - LPMM18/2070  Respondent: Tim J. Harrold 8971233  Agent:

SITE SPECIFIC : A35 FORMER WISLEY AIRFIELD, OCKHAM (MM37 & MM47)

1. The addition of land to the South of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR air traffic control beacon regulations. This prevents construction within a certain radius.

2. Land to the South abuts the Ockham Conservation Area and increases the visibility of the site to and from the Surrey Hills AONB.

3. The biodiversity of the SNCI will be destroyed by the proposed development.
SITE SPECIFIC: A35 FORMER WISLEY AIRFIELD, OCKHAM (MM37 & MM47)

1. The addition of land to the South of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR air traffic control beacon regulations. This prevents construction within a certain radius.

2. Land to the South abuts the Ockham Conservation Area and increases the visibility of the site to and from the Surrey Hills AONB.

3. The biodiversity of the SNCI will be destroyed by the proposed development.

4. It is a breach of case law that an Appropriate Assessment and Habitats Regulation Assessment have not been completed.

Attached documents:

Comment: MM41 - LPMM18/2068  Respondent: Tim J. Harrold 8971233  Agent:

MM41

+Transport strategy relies on inadequate modelling, including the delay in the Junction 10 Highways England RIS scheme of at least two years, which will impact all development that relies on this scheme. This will include Site A35 (former Wisley Airfield), Site A43 Garlicks Arch, Site A63 Land west of Alderton’s Farm (MM44).

Attached documents:

Comment: MM9 - LPMM18/2066  Respondent: Tim J. Harrold 8971233  Agent:

MM9

+Infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM40 - LPMM18/6043  Respondent: Fenella Harrison 8988353  Agent:

I object strongly to the Wisley Airfield ‘newtown’ development scheme on the same grounds, and on environmental and traffic grounds; also on views ‘to and from the Area of Outstanding Natural Beauty’ affected by 5 storey buildings. It is
disengenuous of Councillors to claim that the A3/M25 so-called ‘improvements’ will mitigate the congestion, when they have no control over the traffic scheme. Also it is now proven that more road-space ‘induces’ more and heavier traffic.

Attached documents:

Comment: MM51 - LPMM18/6044 Respondent: Fenella Harrison 8988353 Agent:

I object particularly to the sites earmarked for housing in West Horsley, a historic and largely rural village. We have much localised flooding from the dip-slope and springs of the North Downs. Even the A246 is often badly affected, and this could be exacerbated by the effects of Climate Change. Our schools and the Medical Centre in our shopping area of East Horsley are full. Parking at the local shops and Horsley Station, will become difficult and stressful for the disabled and an ageing population. Our local roads are appallingly congested already at peak times.

Guildford Borough should be concentrating on AFFORDABLE homes for vital workers built near ‘hubs’ in a sustainable way. It should encourage the University of Surrey to house its own students.

Above all it should honour the Green Belt around London, to avoid urban sprawl and to avoid setting a precedent for a future megalopolis of pollution and congestion in the over-heated South-East.

Attached documents:

Comment: MM2 - LPMM18/5723 Respondent: Andrew herzig 8990721 Agent:

On behalf of my wife and me, I am writing to ask you to reconsider the fact that new figures have been produced by the Office for National Statistics which mean that the figures in MM2 for Guildford of 672 extra homes per year are no longer up to date, being excessive. If the newly-produced figures of 360 extra homes per year were adopted, it would enable the planners to reconsider which sites should be used and remove a strategic Green Belt site from the plan. The Blackwell Farm site, which adjoins the Surrey Hills AONB could therefore be removed from the Plan, as the road infrastructure of the area will not support the additional homes planned. The development of the planned extra homes will lead to increased congestion of the A31/A3 junction area, an already overcrowded and frequently problematic junction. The considerations of aesthetic beauty, nature conservation and preservation of the Hogs Back skyline are also exceedingly important to the residents of Guildford, like myself, my family and local neighbours.

... I ask you to urgently reconsider your use of the Blackwell Farm site in the MM2, in the light of this recent publication of the considerably reduced figures by the Office for National Statistics.

Attached documents:

Comment: MM3 - LPMM18/5730 Respondent: Andrew herzig 8990721 Agent:

These newly-published figures also make table S2b out of date and MM3 inadequate and in need of re-examination. The new lower figure of 360 homes would make it much more achievable for the Council to plan the regeneration of the Town Centre, in a more considered, timely, long-term way.
NOTICE OF SUPPORT:

(1) Policy S2 – Spatial Strategy, as it relates to West Horsley

Our overall conclusion is that additional housing sites are necessary to increase delivery rates early in the Plan period. Clearly, the Modifications are responsive, but they are insufficiently attuned to realistic delivery rates- especially in relation to Wisley Airfield.

For that reason, we (i) endorse the Mods Site A40 Allocation, and (ii) seek early release of this, Persimmon-controlled land at West Horsley, detailed below.

(1) Policy S2 – Spatial Strategy, as it relates to Ash/ South East flank.

Persimmon Homes Thames Valley has been in regular dialogue with GBC about Strategic Site A29 on the east flank of Ash. The Submission Local Plan’s allocation for 1,750 dwellings is fully supported.

Within the prescribed area the Company has a 4ha parcel, located off Foreman Road, which is capable of providing a first stage “building block” in carrying the strategic allocation forward in its overall arc from Guildford Road south westwards and across the rail corridor.

Persimmon’s 4ha parcel provides the means of providing a new road link across the railway and incremental fulfilment of the long-held objective of doing away with the problematic level crossing at Ash Station.

Clearly, the necessary new road has further distance to go (beyond this site) to reach Guildford Road, but we urge that the Persimmon land be seen as a vital and deliverable piece of the strategic “jigsaw”.

There are no legal, ownership or technical issues that will prevent development. The site is capable of 172 dwellings overall, of which 40% will be affordable; alongside there will be 0.56 acres for POS and 1.62 acres for SANG provision.

We envisage development implementation and completion within a 3 - 5 year timescale. Our technical study findings have been presented to the Council previously. Persimmon accepts fully that a developer/ land owner consortium will be necessary to shoulder the costs of neighbourhood-wide social infrastructure and the rail crossing.

Site location and indicative development layout are set out below.
Land off Foreman Road, Ash

Indicative Layout for the site:

Attached documents:

**Comment:** Other comments - LPMM18/712  **Respondent:** Persimmon Homes Ltd. (Persimmon Homes Ltd.) 8992033  **Agent:** Michael Williams Planning (Mr Michael Williams)

**(2) Mods Site Ref. A40 – Land at Ockham Road**

**Size:** 8ha;

**Character:** Moderately enclosed by tree cover, with urban influences provided by residential properties located on Green Lane to the north and Ockham Lane North to the east.

**Capacity:** between 90 and 106 dph, depending on density.

**POS:** 1.39ha.

**Flooding:** Layout responds to 1 in 100 year floodplain requirement.

**Development configuration:** central spine road with two loops to each side, filtering down to 7 housing clusters.

**Timescale:** Persimmon Homes’ controlled; implementation and completion in next 3 - 5 years.

*Indicative Layout, with POS provision, shown below:*
Over page is the Mods/ Site A40/ Identification Plan:
Comment: MM2 - LPMM18/4688  Respondent: Shelagh Yeomans 8993121  Agent:

MM2 - policy S2. The examination should be re-opened because the housing figures should be revised in the light of the new ONS forecasts of population and households. The stated housing requirement is not a sound basis for the Local Plan or justification for such an extensive loss of Green Belt land.

MM2 - there is a strong case for taking out a strategic site and more scope for better town centre provision. This makes table (S2), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 - independent expert, Neil MacDonald, has demonstrated that 360 homes per year would support the ambitious economic growth rate proposed by the Inspector. 630 homes a year is out of step with the new ONS figures and the
Government's new standard methodology. 630 is based on inappropriate assumptions that inflate the figures due to excessive allowance for student homes and their low economic participation.

MM2 - it is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained. The number of houses needed in Woking has also been reduced and has also not been re-examined.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5993</th>
<th>Respondent: Caroline Cunliffe 8995393</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I am writing to express my concern regarding the Local Plan for Guildford and the modifications in MM2.</td>
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<tr>
<td>Accepting that there is a need for more housing, the Office for National Statistics has recently produced lower population and household figures. Taking this into account, Guildford needs 360 new homes built each year rather than 672 plus 42 homes. This is a reduction of 75%. I would strongly urge therefore that the number of houses to be built should be reduced in line with this new information.</td>
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<td>There appear to be areas in the town centre which could be redeveloped in preference to sacrificing the Green Belt, for example, the area opposite the Bus Station.</td>
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<tr>
<td>As any Guildford resident is acutely aware, we have ongoing traffic congestion problems both within and around the periphery of the town. Before any further housing is planned there must be a solution found to the issue of traffic congestion.</td>
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<tr>
<td>Guildford is an attractive, historic town which we should treasure. The geography of its site naturally restricts extensive growth and to attempt to overcome this will ruin the character of Guildford. It is difficult to see how to develop Guildford and sacrifice the Green Belt to accommodate the growth of nearby towns such as Woking.</td>
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</tbody>
</table>
I urge you to reopen the discussion on the Local Plan in order that a long term, cohesive plan is formed, respecting the unique character of our town.

Attached documents:

Comment: MM3 - LPMM18/4723  Respondent: Fiona Yeomans 8996481  Agent:

- **Proposed radical changes to traffic through the one way system.** The plan to restrict severely the one way system permanently, including limiting Bridge Street to all but buses and taxis, is “potty” to quote one observer. It WILL NOT WORK!! People do need to drive THROUGH Guildford not just TO Guildford. How will those of us who live on the west side of the River Wey get our shopping home? (Answer is probably to shop in Godalming instead). How do we get to the GP surgery (on the east side). What about the elderly and very young who can’t walk or cycle? Yes of course improvements need to be made. Until the A3 problems are sorted the town centre will always be vulnerable to periodic gridlock as traffic diverts away from the A3.

Attached documents:

Comment: MM31 - LPMM18/4722  Respondent: Fiona Yeomans 8996481  Agent:

I wish to register the following two comments:

- **North Street:** the time for yet more retail space has passed. There is plenty of retail space for the “super centres” - and online shopping is increasingly apace. This land should be used for additional/badly needed housing. The reuse of brownfield sites, proximity to transport links and other facilities etc makes a lot of sense. (Ref MM31 North Street development)

Attached documents:

Comment: MM2 - LPMM18/78  Respondent: Mr Peter Elliott 9009025  Agent:

The second objection is to the inspector's proposal that Guildford should make up the shortfall in Woking's housing need. Not long after The local plan was made public, I received a letter from Nick Boles, the then Minister for Communities and Local Government, which includes the statement 'This government does not impose top-down housing quotas on local authorities'. Does this inspector not feel any obligation to honour his Government's commitments? The other objection I have to this proposal is that Guildford should have to sacrifice much loved and supposedly protected countryside for Woking, a nondescript suburban town which has already decided to go down the high rise route, so that a few more high rise blocks would surely not significantly alter the character of that place.

Attached documents:

Comment: MM2 - LPMM18/79  Respondent: Mr Peter Elliott 9009025  Agent:
My final objection to the recent modifications to the local plan is that, as reported in this week's Surrey Advertiser, the ONS has calculated that the population of Guildford will fall by 40% over the period of the plan, so this whole drive for mass development on our precious Green Belt is based on completely erroneous assumptions, and needs to be completely re-thought.

Attached documents:

Comment: MM37 - LPMM18/77  Respondent: Mr Peter Elliott 9009025  Agent:

Dear Planning Team,

I have given some thought to whether I can be bothered to respond to the latest version of the local plan, as all previous' consultations seem to have been pretty much a box-ticking exercise, and you have largely gone ahead with what you wanted to do in the first place, regardless of the tens of thousands of objections. But I do not want my silence to be construed as consent, so here goes:

I would like to strongly object to two of the modifications to the local plan, proposed by the inspector.

The first is to increase the area to be taken out of the AONB on the Hog's Back, to accommodate the access road to the huge development at Blackwell Farm. There doesn't seem to be much point in having an NPPF, and AONB's, and a Green Belt, if these are to be simply ignored at the first opportunity. I also see that the terms of reference for the current nationwide review of AONB's includes the statement that no AONB should be reduced in size, so surely this proposed plan will fall foul of that, in addition to all the other planning legislation that the inspector has flouted.

Attached documents:

Comment: MM42 - LPMM18/4767  Respondent: Dan Moss 9039553  Agent:

MM27. MM41. MM42. and MM48-Transport Strategy.

This area is already very heavily congested! There has been no investigation into the effect caused by 1000's more cars on these local roads. Why?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane.

This massive increase in traffic of all sorts heading to and from Woking along. Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM35 - LPMM18/4612  Respondent: Victoria Sandu 9042049  Agent:
### Change MM35

- The proposed development at Gosden Hill Farm together with the new expanded developments at Burnt Common (MM42) and Garlick's Arch (MM41) will effectively connect the urban conurbation of Guildford with that of Send / Send Marsh / Burnt Common. This will remove much of the distinct local character of Send and Send Marsh and will go against Policy D1 item (6) in MM23. Send will no longer be a separate village but will be part of the Guildford conurbation.

**Attached documents:**

### Comment: MM41  LPMM18/4613  Respondent: Victoria Sandu 9042049  Agent:

**Change MM41**

I object to this increased size of development at Garlick's Arch for the following reasons:

- The proposed increase of 37% in the number of houses in the Garlick's Arch development from 400 to 550 is excessive and will further increase the demands on the already extremely stretched road infrastructure in the area. This will also put more pressure on the already inadequate schools and medical facilities in the area. School resources have already been reduced by the recent closure of Ripley Church of England Primary School.

- This development together with the increased size of the Burnt Common development (MM42) and the proposed development at Gosden Hill Farm (Policy A25) will result in the Send Marsh / Burnt Common becoming part of the extended Guildford conurbation. This will change the local character of the area and goes directly against Policy D1 (6) in MM23 which states 'All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development.'

- Total new housing proposed for Send when including Garlick's Arch, Winds Ridge (40), Clockbarn (60) and Alderton's Farm (120) (MM44) adds 770 houses to the 1700 current houses in Send. This is an increase of 45%! This is an unreasonable increase and the local road, educational and medical infrastructures will not be able to cope. And also the levels of pollution will cause the already dangerous levels of nitrogen dioxide to become even worse.

**Attached documents:**

### Comment: MM42  LPMM18/4614  Respondent: Victoria Sandu 9042049  Agent:

**Change MM42**

I object to this change for the following reasons:

- The increase in proposed size of this industrial estate makes this more than double the size of that originally proposed. This is far larger than any other industrial area in any other village in Guildford Borough, and further suggests to the merging of the Guildford conurbation with Send / Send Marsh. This development together with the increased size of the Burnt Common development (MM42) and the proposed development at Gosden Hill Farm (Policy A25) will result in Send becoming part of the extended Guildford conurbation along the A3. This will change the local character of the area and goes directly against Policy D1 (6) in MM23 which states 'All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development.' Clearly this change does not.
The proposed increase in development size goes against policy MM9 that states 'inappropriate development will not be permitted unless VERY SPECIAL CIRCUMSTANCES can be demonstrated.' No such special circumstances have been demonstrated, and is particularly surprising when Slyfield Industrial Estate has unused capacity, and the Employment Lands Needs Assessment showed a reduced demand for industrial land in the area.

Attached documents:

Comment: MM44 - LPMM18/4615  Respondent: Victoria Sandu 9042049  Agent:

I object to this change for the following reasons:

- This proposed development takes advantage of the vague definition in MM9 of 'Limited infilling' being considered 'where it can be demonstrated that the site should be considered to be within the village.' This development is outside of the boundary of the village of Send Marsh / Burnt Common and no special circumstances have been demonstrated as to why this development should be seen as an exception to the NPPF and its policies protecting the Green Belt. As a result there is no reason to change the boundary of the village of Send Marsh to accommodate this development.

- Send Marsh village has much character centred around the Village Green with several heritage buildings surrounding the green and local wildlife reserves such as Papercourt Lake. The large size and close proximity of this proposed development will change the local character of the area and goes directly against Policy D1 (6) in MM23 which states 'All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting.'

- The proposed new development is a site which has wide spread wildlife such as hedgehogs, butterflies and birds, some of which are endangered species, particularly hedgehogs. The new development will significantly reduce this habitat and will have a detrimental effect.

- Road infrastructure in the area going in all directions (Send Marsh Road towards Send and towards Portsmouth Road, and Polesden Lane) are already inadequate for current traffic levels, with already long queues every morning. The addition of a further 120 homes on Send Marsh Road will create excessive problems on these roads, particularly Polesden Lane which is a single lane road, already used as a diversion route when there are traffic problems nearby.

- Total new housing proposed for Send when including Garlick's Arch (550), Winds Ridge (40), Clockbarn (60) and Alderton's Farm adds 770 houses to the 1700 currently in Send, increasing the total development by 45%. This is an unreasonable increase and the local traffic, educational and medical infrastructures will not be able to cope.

- The increase of 770 houses in Send will also noise levels over above the significant noise already heard from the A3 and the Portsmouth Road.

Attached documents:

Comment: MM9 - LPMM18/4611  Respondent: Victoria Sandu 9042049  Agent:
I am writing in response to the public consultation on the revised Guildford Local Plan: Strategy and Sites which started on 11th September 2018.

**Change MM9**

- What are the minimum rules / standards that need to be satisfied before the 'Limited infilling' mentioned in Policy paras (1) to (4) could be considered? It is stated that this is 'where it can be demonstrated that the site should be considered to be within the village' however this is a very subjective definition and is open to interpretation.

- Paragraph 4.3.25 suggests 'There are a number of considerations to take account of when assessing whether a site is located within the village'. Only 2 such factors are stated as being 'pattern of development, and the proposed development's relationship to the built up area of the village and the surrounding countryside.' What other factors are there? This is not clear, and this a very subjective policy.

- It is particularly unclear as to how an 'inappropriate development' may be demonstrated against the vague definitions given regarding what may be appropriate in terms of limited infilling? Is limited infilling seen as 'very special circumstances', thereby making the development 'appropriate'?

**Attached documents:**

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**Comment: MM2 - LPMM18/5296** **Respondent:** Carol Mills 9051617 **Agent:**

I object - on the following grounds:

There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release

I have not been advised of the consultation

The examination in public should be reopened so that the latest Office of National Statistics can be used

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

**Attached documents:**

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**Comment: MM2 - LPMM18/5295** **Respondent:** Margaret Mills 9051713 **Agent:**

I object - on the following grounds:

This is green belt land and the secretary of state has already rejected this.

The housing target is wrong.

I have not been advised of the consultation

The examination in public should be reopened so that the latest Office of National Statistics can be used
I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC.

Attached documents:

Comment: MM12 - LPMM18/4496  Respondent: Wisley Property Investments Ltd. (Wisley Property Investments Ltd.) 9079393  Agent: Savills (Ruth Bryan)

**Paragraph 4.3.50c**

“All net new residential development up to five km from the SPA...are considered likely to have a significant effect. Where significant effects are likely, and proposals must undergo Appropriate Assessment to identify measures that avoid, as a first step and mitigate any adverse effects. However if these residential development provide or contribute to appropriate SANG and SAMM measures in accordance with the Thames Basin Heaths Special Protection Area Avoidance Strategy (the strategy) they will not be required to undergo Appropriate Assessment it is likely that it can be concluded that no adverse effects on the integrity of the SPA will occur as a result of increased recreational pressure”

**WPIL object** to this modification as this requires all development within the 5km buffer of the SPA to automatically proceed to an Appropriate Assessment, without having first considered the Screening Stage Assessment.

The proposed amendment appears to broadly follow recent and emerging case law in respect of Appropriate Assessments, however this may be subject to change in the future. This could result in the Local Plan containing out of date policies in this respect. The stepwise approach to Habitats Regulations Assessment is set out clearly by Article 6(3) of the European Habitats Directive and Regulation 63 of the Conservation of Habitats and Species Regulations 2017, and therefore does not need to be repeated in the supporting text of Policy P5.

If GBC insist on including the proposed revision, then in order to address the recent implications of the People over Wind Judgement, the text should read as follows:

“In light of the People over Wind Ruling in the European Court of Justice which requires consideration of impact avoidance and mitigation measures to be excluded at the Screening Stage of the Habitats Regulations Assessment process, all net new residential development up to five km from the SPA is now considered likely to have a significant effect on the SPA, and proposals are therefore required to undergo Appropriate Assessment during which measures that avoid, as a first step and mitigate any adverse effects on site integrity can be identified and considered. If these residential...
developments provide or contribute to appropriate SANG and SAMM measures in accordance with the Thames Basin Heaths Special Protection Area Avoidance Strategy (the strategy) it is likely that GBC (as the competent authority under the Regulations) will be able to conclude that no adverse effects on the integrity of the SPA will occur as a result of increased recreational pressure”

WPIL consider the change to be a minor legal clarification and would not require main modification.

Attached documents:

Comment: MM15 - LPMM18/4497  Respondent: Wisley Property Investments Ltd. (Wisley Property Investments Ltd.) 9079393  Agent: Savills (Ruth Bryan)

Policy E3 Addition of (7):
“the provision of ancillary uses on a Strategic or locally Significant Employment Site that complement and positively enhance the functioning of the employment area will be supported”

Paragraph 4.4.31a goes on to set out:

“the provision of ancillary uses as referred to in Policy E3(7) within employment areas can serve to enhance the function and attraction of these sites to businesses and their employees and reduce the need for staff to travel to alternative facilities away from the workplace. Such uses may be

provided on site either as new buildings by means of expansion of an existing B1, B2 or B8 use or as redevelopment of part of an existing B1, B2 or B8 use. Examples of ancillary uses considered appropriate on a Strategic or Locally Significant Employment site that would be supported include small local shops, gymnasium, crèches and canteens.”

WPIL support this modification as it will support the development of mixed use and sustainable employment areas in the Borough, including at Wisley Airfield.
1. Introduction

1.1. This Representation has been submitted by Wisley Property Investments Ltd (WPIL) as part of the consultation on the main modifications to the emerging Guildford Borough Local Plan: Strategy and Sites (‘eGBLP’).

1.2. The Representation is in line with representations previously submitted by WPIL to the Strategy and Sites Proposed Submission Regulation 19 consultations held in July 2017 and June 2016. The representations submitted in July 2017 specifically addressed the focused amendments made to the eGBLP. A Full background to the site was provided within the previous representations and is not repeated here.

1.3. The key factor to note however is that WPI is the majority landowner within draft Allocation A35. Wisley Airfield comprises circa 115 hectares (ha), of the circa 132 ha allocation. WPI has been in liaison with the landowners of land at Bridge End Farm (being land to the south of the airfield and within the allocation) and their agents throughout the Local Plan and Examination process.

1.4. Previous representation included full technical justification for the proposed new settlement allocation at Wisley Airfield (draft policy A35) and fully demonstrated that the proposed allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will deliver homes to meet the urgent and pressing needs.

1.5. In respect of the representations made previously by WPIL, a number of objections were made to the submission eGBLP. A number of these objections have now been resolved as outlined below:

WPIL Previous Representation Objections Withdrawn

- **Site of Nature Conservation Interest (SNCI)** – following discussions with GBC and comments made by the Inspector during the examination hearings, the SNCI boundary effecting Wisley has been altered. WPIL and GBC have entered into a Statement of Common Ground detailing this which has been submitted to the Inspector. **This objection is therefore withdrawn;**

- **Affordable Housing** – WPIL outlined that the affordable housing policy should be expressed as a target and that the absence of reference to viability were likely to make Policy H2 ineffective. As demonstrated through the Appeal proposals, WPIL are committed to providing 40% affordable housing at Wisley Airfield. Policy H2 has been modified following the Examination and **this objection is withdrawn;**

- **Combined Heat & Power** – WPIL previously objected to the requirement for all development to connect or safeguard connection to CHP. The requirements have been amended as part of modification to Policy D2 and **WPIL therefore withdraw this objection;**

- **Sustainability Appraisal (SA) June 2017** – WPIL outlined that the SA (2017) incorrectly referred to Wisley Airfield as being "medium sensitivity" which was not in line with the evidence base. WPIL do not object to the SA 2017, and are only highlighting this discrepancy;

- **Policy A35 Retail Provision** – WPIL outlined in their objection that the evidence submitted as part of the planning appeal at Wisley Airfield supported a higher level of retail provision than included in Allocation A35. The provision of retail has not been amended, however, a retail provision in line with A35 can be progressed through the proposed resubmission application. **WPIL therefore withdraw this objection;**
• **Policy A35 Gypsy & Traveller Pitches** – WPIL highlighted that the requirements for tenure of traveller pitches and a flexible requirement for the scale of provision had not been included in the policy. **WPIL withdraw this objection** and will secure appropriate Gypsy and Traveller pitches through the proposed resubmission application.

**WPIL Previous Representation Objections Maintained**

1.6. The only remaining objection from the Regulation 19 consultation is in respect of the emerging Proposals Map identifying Wisley Airfield as a “Safeguarded Waste Site”. **WPIL maintain this objection to the eGBLP.** As outlined previously, this reflects the out of date Surrey Waste Plan (2008) which is currently being updated by Surrey County Council (SCC). WPIL have confirmed to SCC that the Site is not available for a waste development and Officers have confirmed that they will not be allocating the Site in the emerging Waste Plan. GBC should therefore remove this notation from the Proposals Map. This is considered to be a minor alteration to the proposals map which does not relate to any specific policy in the eGBLP and can therefore be altered via a minor modification prior to adoption of the Plan. This objection would not therefore warrant any further main modification.

**Progress of the eGBLP**

1.7. The eGBLP has now been in preparation for a significant amount of time, having been delayed a number of times during its preparation. The lack of an up to date development plan has impacted on housing delivery and delayed deliverable sites from coming forward. WPIL are strongly supportive of the adoption of the eGBLP as soon as possible and GBC should take all necessary steps to secure the adoption of the plan in a timely manner.

**Wisley Airfield Resubmission Application**

1.8. WPIL have begun the process of preparing a resubmission application on Land at Wisley Airfield, which is proposed to be submitted to GBC in mid 2019. Pre-Application discussions with GBC Officers have commenced and are ongoing. The proposed resubmission, and the evidence submitted with the previous application and appeal, demonstrate that the site is deliverable and support the housing trajectory outlined in the eGBLP. WPIL, together with the landowners of land at Bridge End Farm submitted to the Examination an agreed trajectory for housing delivery in line with the eGBLP trajectory, further supporting deliverability. WPIL has secured in principle agreement with Highways England in respect of highways mitigation relating to the appeal scheme. This, together with the an adopted policy allocation area’s associated potential for a revised approach to design and removal from the Green Belt, and local sustainable transport proposals, will address the remaining issues raised by the Inspector at the Appeal.

**2. Representation to Main Modifications**

2.1. This representation is structured in the same order as the Main Modifications and specifically addresses the modifications relevant to Wisley Airfield. The table below sets out WPIL comments and objections (where relevant) to the Main Modifications to the eGBLP. In respect of Policy A35 WPIL comments on the amendments to this policy are outline from paragraph 2.2.

<table>
<thead>
<tr>
<th>MM2</th>
<th>Policy S2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amendment to include a housing target of 630 dwellings per annum plus 42 units to contribute to Woking’s unmet need.</td>
<td></td>
</tr>
</tbody>
</table>

**WPIL support** the housing target and the inclusion of additional homes to meet Woking’s unmet need.

Contribution to Woking will be reviewed on basis of review of Woking Local Plan

Total provision over the plan period (2015-24) to rise from 12,426 to 12,600 units.
<table>
<thead>
<tr>
<th>MM2</th>
<th>Policy S2</th>
<th><strong>WPIL support</strong> removal of a stepped trajectory.</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Stepped Housing Target deleted.</td>
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</tbody>
</table>

### Attached documents:

**Comment:** MM22 - LPMM18/4498  **Respondent:** Wisley Property Investments Ltd. (Wisley Property Investments Ltd.) 9079393  **Agent:** Savills (Ruth Bryan)

<table>
<thead>
<tr>
<th>MM22</th>
<th>Policy E9 Addition of 4(a):</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>“when developed the new local centres that are planned to be built at the strategic sites of...Wisley Airfield...will be treated as Local Centres within the context of this plan, and their location and boundaries designated in the next Local Plan review”.</td>
</tr>
</tbody>
</table>

**WPIL support** the addition to Policy E9.

### Attached documents:

**Comment:** MM23 - LPMM18/4499  **Respondent:** Wisley Property Investments Ltd. (Wisley Property Investments Ltd.) 9079393  **Agent:** Savills (Ruth Bryan)

<table>
<thead>
<tr>
<th>MM23</th>
<th>Policy D1 (7) in respect of reflecting local character, addition of:</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>“given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods”</td>
</tr>
</tbody>
</table>

**WPIL support** this addition to Policy D1 as it provides flexibility for strategic allocations to create a high quality design which responds to both local character where appropriate and to deliver varied well designed places which meet the needs of new residents. This amendment is also supported by Policy A35.

<table>
<thead>
<tr>
<th>MM23</th>
<th>Policy D1 addition of section on Masterplans for strategic sites:</th>
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<tbody>
<tr>
<td></td>
<td><strong>WPIL are broadly supportive</strong> of this modification. However the development of masterplans for the</td>
</tr>
</tbody>
</table>
developers will be required to produce masterplans for ...former Wisley Airfield (A35) and these will be subject to assessment by a Design Review Panel. The Masterplanning process shall engage with the local community”

Planning applications will be consistent with the Masterplans, which must be kept under review”

strategic allocations including Wisley Airfield in conjunction with Design Panel and public consultation must not delay the progress or delivery of these allocations. These must allow by at a high enough level to provide flexibility as the detailed proposals for the allocations are developed through the planning process.

Policy D1 Addition at (5):
“New development shall be of a high quality and inclusive design, as per the Design Guide Supplementary Planning Document (SPD), and all new development will be required to address the following”

WPIL object to the reference in the Policy to the Design Guide SPD. It is not clear which SPD this refers to or whether this refers to an emerging SPD to be produced and is therefore ambiguous and unclear.

For example if this reference relates to the Residential Design Guide Supplementary Planning Guidance for example, this was adopted by GBC in 2004 and is therefore considerably out of date and was not produced to advise on the development or design of strategic sites.

The policy should therefore be amended to remove the unclear reference to an SPD and be amended to be clear on whether a new SPD is being proposed. It would also be positive for GBC to outline that the SPD would not apply to strategic sites which have specific policy requirements set out in D1 (15-17). WPIL consider this to be a minor change.

Policy ID1 Addition at (4):
“if appropriate, the imposition of Grampian conditions should be considered as a means to secure the provision of infrastructure when it is needed”

WPIL support this addition to the Local Plan to assist in securing off-site infrastructure for strategic development.
<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/4501</th>
<th>Respondent: Wisley Property Investments Ltd. (Wisley Property Investments Ltd.) 9079393</th>
<th>Agent: Savills (Ruth Bryan)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MM27</strong> Policy ID2 Addition at (2):</td>
<td>WPIL do not have any specific comment on this amendment, however, it is important to note that this addition to Policy ID2 refers to the second round of the Road Investment Strategy, known as ‘RIS 2’ which is planned to be progressed post 2020. The RIS 2 improvements do not impact on the mitigation required to deliver development at Wisley Airfield, due to these works being included within ‘RIS 1’. Therefore in the event that ‘RIS 2’ is delayed or cancelled this would not affect the delivery of Wisley Airfield.</td>
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<tr>
<td>“in the event that there is a material delay in the anticipated completion and or a reduction in scope of the A3 Guildford (A320 Stoke interchange junction to A31 Hogs Back junction) “Road Investment Strategy” scheme form that assumed in plan-making, or cancellation of the scheme, Guildford Borough Council will review its transport base to investigate the consequent cumulative impacts of approved developments and Local Plan growth including site allocations on the safer operation and the performance of the Local Road networks and Strategic Road Networks. In the case of material delay in the anticipated completion and or a reduction in scope in the A3 Guildford scheme, the review will consider the period up to the revised date of completions of the scheme. This review will be undertaken with input as appropriate from Surrey County Council and Highways England or any other licenced strategic highway authority appointed by the Secretary of state under the Infrastructure Act 2015. The outcome of this review will determine whether development can continue to be completed in accordance with the Local Plan trajectory or will determine whether there needs to be review of the Local Plan”.</td>
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<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM40 - LPMM18/4502</th>
<th>Respondent: Wisley Property Investments Ltd. (Wisley Property Investments Ltd.) 9079393</th>
<th>Agent: Savills (Ruth Bryan)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Policy A35</strong> 2.2 As previously stated WPIL are supportive of the eGBLP and Allocation WPIL do however have a number of minor comments on the main modifications relevant to Allocation A35 (ref: MM40). These are set out below, and are all considered to be minor modifications:</td>
<td></td>
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<tr>
<td>• In respect to the SNCI at Wisley Airfield and as outlined above, WPIL have agreed a Statement of Common Ground on this matter with It is important to note that the SNCI at Wisley Airfield is important in respect of species - particularly reptiles. It is therefore wholly possible for development proposals on the site to mitigate the impact on species for example through retention of habitats or translocation of species. This was also demonstrated through the appeal proposals;</td>
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<tr>
<td>• The numbering sequence in the policy has not been updated following modifications being made to the This is particularly evident in the sections labelled ‘Transport Strategy’ and ‘Other Infrastructure’. This should be updated by GBC prior to adoption of the eGBLP;</td>
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</tbody>
</table>
An addition has been made in respect of Ripley Wastewater Treatment Works, through the appeal process, WPIL agreed with Thames Water a number of conditions which secure appropriate capacity;

2.3 The only objection which WPIL maintain in respect of Allocation A35 is to the proposals map which includes a notation on Wisley Airfield as a “safeguarded waste plan”. As outline previously, this reflects the out of date Surrey Waste Plan (2008) which is currently being updated by Surrey County Council (SCC). WPIL have confirmed to SCC that the Site is not available for a waste development and Officers have confirmed that they will not be allocating the Site in the emerging Waste GBC should therefore remove this notation from the Proposals Map. This is considered to be a minor alteration to the proposals map which does not relate to any specific policy in the eGBLP and can therefore be altered via a minor modification prior to adoption of the Plan.

3. Conclusions

3.1 WPIL are supportive of the eGBLP and support the adoption of the Plan as soon as The majority of the principles of the eGBLP and its spatial strategy has been found sound by the Inspector, including Allocation A35.

3.2 The main modifications proposed by GBC are generally supported by WPIL object to only two small elements of the eGBLP and main modifications which can be altered via minor modification:

- MM12 Supporting Text to Policy P5 – this should be reworded to reference the relevant legislation and guidance in respect of Habitats Regulation Assessments and the Special Protection Area;
- Proposals Map Wisley Airfield – the reference to “Safeguarded Waste Site” should be removed from the proposals map;
- Various drafting and numbering updates to A35;

3.3 On the basis of these minor alternations being taken forward by GBC prior to adoption of the eGBLP, WPIL consider the Plan to be sound and support the adoption of the

Attached documents:

Comment: MM2 - LPMM18/2102  Respondent: William D Barker OBE 9081089  Agent:

I wish to object to the Guildford Local Plan on the grounds, amongst others, that it ignores the inadequacy of the highway infrastructure to take the number of houses proposed.

Even now traffic queues tail back, stuck in lanes waiting for the cars ahead to clear before they in turn move forward. Stuck in traffic, exhaust pipes emitting toxic gas in close proximity to schools or residents in the houses which abut the roadside edge, Newark Lane in Ripley is a typical example of this.

Of course people do not die immediately from this effect but the process is accumulative, life is not only shortened but the quality in the latter stages of life is one of ill health brought on by the bronchial affects. Treatment of such adds costs to NHS one which they can ill afford.

This planning is not to be done in isolation of one Government Department, it needs the consultation of all departments Highways England, County Council, Borough Council and the Parish. I see no evidence that there has been this degree of consultation and in such circumstances I maintain my objection.

Attached documents:

Comment: MM43 - LPMM18/861  Respondent: St Martha Parish Council (Anne Tait) 9227073  Agent:
Policy A62: Hornhatch Farm, land adjoining New Road, Chilworth - Proposed Early Housing Development of 80 new homes

Response from St Martha Parish Council: Consultation on modifications to the new Local Plan

The Sustainability Appraisal (SA) of the Guildford Borough Local Plan (SA Report Addendum September 2018) states on Page 15: ‘Land at Hornhatch Farm (80 homes) - performs well relative to other village Green Belt sites discussed’. St Martha Parish Council, which has first-hand local knowledge of the area, wishes to put forward the following reasons as to why in its opinion this site does not perform well compared to other sites and is unsuitable for such proposed development. In particular, it would like to point out that there has been no reference to potential serious traffic problems, an easement across the site, the lack of amenities, and the full impact on the AONB has been largely overlooked.

• Hornhatch Farm site is the only site where the development would have a significant impact on views from the AONB compared to the other relative sites considered in the Sustainability Appraisal. It therefore does not ‘perform well relative to other village Green Belt sites discussed’.

• Hornhatch Farm is a 4.5 ha. area of moderate to good agricultural land on the edge of the village and surrounded by the Surrey Hills AONB and AGLV. It is clearly visible from the Chantiers to the north which has striking views across the area. Under the LU5 of the Surrey Hills Management Plan (2014-2019) it is stated: development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted, and the Local Plan Policy P1: Paragraph 4.3.5 states: development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities. Developing Hornhatch Farm would have a negative impact on views across the AONB and would neither conserve nor enhance its special qualities.

• The proposed development site is currently in the Green Belt and outside the settlement area and should remain so. The National Planning Policy Framework July 2018 (NPPF) states (page 40 paragraph 133) that the Green Belt is there: to prevent urban sprawl and keep the land permanently open and to assist in safeguarding the countryside from encroachment. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified (page 40 paragraph 136). Under paragraph 137 (a) page 41 it further states that: as much use as possible should be made of suitable brownfield sites. Further consideration should be given to the use of brownfield sites in the Borough rather than agricultural fields in the Green Belt surrounded by the AONB, even if this does mean a slightly longer delivery period. This site should also remain as an open space rather than adding to the linear development of the village of Chilworth along the road. Linear development is discouraged as it detracts from the character of individual settlements.

• Immediately next to Hornhatch Farm is the road junction of the A248 from Shalford and the B2128 from Wonersh, known as Rice’s Corner. It is a very busy junction and already causes long delays and tail backs of traffic at peak times throughout the day, including the start and finish of the school day.

• With the impending development of Dunsfold Park, the level of development at Cranleigh and surrounding areas, and more houses already being built in Chilworth itself as infilling, the pressure on this junction will be further increased considerably and the proposed development of Hornhatch Farm with 80 extra homes will only add to this. It will mean increased motor vehicle movements in the area and assuming most new homes have 2 cars or more, plus deliveries, visitors, and services, this will mean hundreds of car movements to and from this site per day.

• An earlier proposal was for the access point to be directly off New Road in the far south west corner of the site. As this access point is situated near a bend in the road and close to the junction at Rice’s Corner, entry and exiting from this site could be difficult and dangerous. It will be hard to enter and exit when there is a ‘bottle neck’ of traffic at Rice’s Corner and traffic queuing along New Road. If the access point is moved further east along New Road there is another bend, school entrance and the entrance to the Hornhatch Estate.

• The Parish Council understands an underground high-pressure gas pipeline runs north-west to south-east across the piece of land. This would provide a significant physical constraint to the development as it prevents development on an 18-metre easement across the centre of the site.
• There are green corridor linkages to wildlife habitats immediately outside the site which would greatly benefit from the land adjacent to these being left permanently open. The NPPF says that wildlife corridors should be safeguarded (paragraph 174 (a) page 50).

• One of the arguments used in the past for Hornhatch Farm to be used as a development site and considered sustainable is that Chilworth was described as having a ‘range of shops, services and amenities’ and access to ‘good bus and rail services’. In reality, Chilworth has limited shops: one office (which is very vulnerable to closure), one small store and ladies dress shop. The bus service is restricted to hourly within the day but is non-existent in the evenings and extremely limited at weekends. The train line from Reading to Gatwick only has trains stopping each way once every hour, or every two hours. Chilworth Station has no parking facilities and the station is one mile away from Hornhatch Farm. Residents of this development would have to walk to the station to catch the occasional stopping train. In fact, most residents of the village and indeed the whole of the Tillingbourne Valley depend on the car for transport.

• Though the village has a Junior and Infant School there is difficulty getting to Secondary Schools, medical services and anything other than basic shopping apart from by car. Most people use their car to drive from the Hornhatch end of the village to the Infant School as this is also a mile away at the other end of Chilworth.

• If the area is developed for housing it would mean a change of use from agricultural fields which could make it vulnerable to surface water and run-off problems.

• It has also come to light that the Office of National Statistics (ONS) recently released figures showing that the predicted Guildford Borough housing needs will be far below the Borough Council’s proposed housing targets used when preparing the draft Local Plan. Is this development site therefore justified?

In light of these figures, this proposal should be reassessed, may be at a later date, when the picture becomes clearer and justification be given for Guildford to ‘help out’ Woking in meeting the wider housing needs.

To summarise:

St Martha Parish Council thinks Hornhatch Farm is an unsustainable site for the proposed development of 80 new homes on the grounds of: traffic congestion; road safety; access; sensitivity of the surrounding Surrey Hills AONB, AGLV and protected views; currently outside the settlement area and in the Green Belt; the need for it to remain as permanent open space in the Green Belt; inappropriate linear development; an easement across the land; wildlife corridors; limited public transport; lack of amenities; possible water run-off; agricultural land surrounded by the AONB being used for development rather than existing brownfield sites; can the need for these new houses be justified?

The Parish Council, like many locally, feels very strongly that this area should not be used for housing development but kept as an open space. If, however, housing development does take place St Martha Parish Council would wish to see:

• A reduction from 80 houses to a maximum of 30 as the proposed scale of development is unsustainable
• A roundabout at Rice’s Corner to ease the congestion and help the flow of traffic where a very busy ‘A’ road meets a very busy ‘B’ road
• Very careful consideration given to the access point to this site
• Houses that are sensitively designed, in keeping with the character of the area, and well screened to minimise the impact from the AONB and AGLV
• If fewer houses are built, the remaining area immediately around the development should be secured as Green Belt permanent open-space, to reduce the impact on the AONB and AGLV and give greater protection to the wildlife corridors. This would mean reducing the area being currently proposed for insetting from the Green Belt. (Map dated 20th August 2018 on page 76 of the Schedule of proposed main modifications to the Submission Local Plan (2017) refers.)
• Any development should include space for planting and growth of large native trees outside private gardens to soften the visual impact of the buildings in time.
• Emphasis on affordable rental housing to enable young people who have grown up in the area to remain in the area.

Attached documents:
Comment: MM3 - LPMM18/1177  Respondent: Mr David Ogilvie 9231713  Agent:

(1) This policy is wishful thinking developers will want to make money. The plan should include sufficient masterplanning, regarding land use, building height, density and plot ratio to render this paragraph unnecessary.

(2) To require all major developments to include housing is not good planning. e.g. office and housing does not mix well.

(3) This policy will encourage over development and the omission of good landscaping and open space.

(6) f) add good landscape design.

4.1.18(b) This strategy does nothing to improve pedestrianisation all the way to the station or to reduce traffic congestion, noise, danger and pollution on the gyratory.

4.1.21 the Local Plan does not do sufficient to address brownfield first as required by the NPPF. It does not give guidance regarding building densities, building heights, plot size, plot cover, landscape requirements or parking requirements.

Parking provision should relate to use, access to public transport and not be a means of encouraging dense development.

For the reasons above I consider the town centre proposals unsound and the Local Plan hearing should therefore be reopened.

I have previously submitted a plan to GBC that will solve most of these problems as far back as 2012 and more recently.

Attached documents:

Comment: MM13 - LPMM18/4352  Respondent: Patricia Wood 9237953  Agent:

MM13: In the town centre, retail is allocated too much. High streets are losing customers and the current trend is for increased online shopping, which means that some of this allocation could be used for sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/4350  Respondent: Patricia Wood 9237953  Agent:

I am writing to object most strongly to the Main Modifications of Guildford Borough Council's Local Plan. Please find my objections listed below.

MM2: The housing target is not correct and thus the hearing needs to be reopened, in order for the latest figures and household projections from the Office of National Statistics to be taken into account.

MM2: There should not be any requirement for Guildford to take Woking's unmet needs: this would require further Green Belt release, the very last option.

MM2: The council’s spatial strategy has not been followed correctly, as this requires development to take place in the following order: town centre, urban area and brown field sites before land in villages or Green Belt. A further 400-500 houses in Send, all of which would be dependent on car travel, would have a major impact on Portsmouth Road, Ripley and beyond. This has not been properly considered.
Comment: MM23 - LPMM18/4353 **Respondent:** Patricia Wood 9237953  **Agent:**

MM23: Policy D1 dilutes the requirement for the social dimension of sustainability, making things easier for the developer, for example with regard to pedestrian and cycle routes and walking distances.

MM23: There should not be exemptions from design constraints. This would favour the developer over the general public.

MM23: No evidence is shown that recent case law such as "People over Wind" has been taken into account.

Comment: MM3 - LPMM18/4360 **Respondent:** Patricia Wood 9237953  **Agent:**

S3: The proposed policy for the town centre is completely inadequate and does not address the infrastructure deficit.

It is essential that the public examination is reopened, so that the latest information from the Office of National Statistics can be applied.

I completely support the representation made by WAG, which was written with advice from Richard Harwood QC.

Comment: MM40 - LPMM18/4357 **Respondent:** Patricia Wood 9237953  **Agent:**

*Site Specific: A35 Three Farms Meadow please note included in MM41

Site Specific: A35 There Farms Meadow

- The presence of the VHF Omni-directional Range puts constraints on the density of the area: adding land to the south of the appeal site will not alter this.
- Land to the south is next to the Ockham Conservation area.
- Land to the south means that the site is more visible from the Surrey Hills Area of Outstanding Natural Beauty.

Comment: MM41 - LPMM18/4354 **Respondent:** Patricia Wood 9237953  **Agent:**
MM41: Improvements to the A3 play too large a part in the Council’s plans. These are beyond GBC’s control and there is no fixed timescale.

MM41: It appears that GBC’s transport scheme relies on insufficient modelling, especially with regard to the problems at Junction 10 of the A3/M25 interchange. Highways England Road Investment Strategy covers at least 2 years and will have an enormous impact on this and all development that relies on these improvements, such as *Site A35 Three Farms Meadow, *MM41 Site A43 (Garlick’s Arch) and *MM44, Alderton's Farm.

*MM41: Site Specific: A43 Garlick’s Arch: please note inclusion above

Attached documents:

Comment: MM44 - LPMM18/4356 Respondent: Patricia Wood 9237953  Agent:

*MM44: Alderton’s Farm: please note inclusion above in MM41.

Attached documents:

Comment: MM50 - LPMM18/4359 Respondent: Patricia Wood 9237953  Agent:

• MM47: There is no justification for altering the SCNI boundary.
• MM47: The size of the Site of Nature Conservation Interest is drastically reduced, despite the ecological grounds that apply to the entire site.
• MM47: the biodiversity of the SNCI will be destroyed by the proposed development.
• MM47: Case law is breached as the "appropriate assessment" and a "Habitats Regulation Assessment" have not been completed.

Attached documents:

Comment: MM9 - LPMM18/4351 Respondent: Patricia Wood 9237953  Agent:

MM9: The protection of the countryside will suffer if infilling takes place around and in villages.

Attached documents:

Comment: MM23 - LPMM18/5206 Respondent: G4 residents association (Sir or Madam) 9238593  Agent:

MM23

D1 can we strengthen the need to insist on the use of the latest environmental heating systems and other issues that are important given the current fears over climate change. We seem to be concentrating on solar energy and ducting for
digital connectivity. This is particularly important in the master plan for strategic sites when systems can be designed in rather than retro fitted. I can see this is covered in MM24 but surely applies to both?

Attached documents:

Comment: MM3 - LPMM18/5205 Respondent: G4 residents association (Sir or Madam) 9238593 Agent:

MM3
Policy S3.
4.1.19 (g)

Recent roadworks have highlighted the problems for those who live in the town centre and do need to drive through as opposed to those visiting who we would encourage to drive to not through. We must not forget local traffic needs and the impact on family and business when a simple journey is hampered. Improvements to bus services with smaller local buses might be one answer. Of course all this may change with autonomous cars but the shorter term problem needs to be addressed if we are to have a successful town centre community.

4.1.21 an increase in car club provision would help

4.1.22 provision of small flexible units for mixed light industrial/design/small business would benefit residents in the town who currently have to work at home or drive out of town to work spaces.

Attached documents:

Comment: MM40 - LPMM18/3209 Respondent: Peter Cordrey 9244641 Agent:

I am a resident of Ockham after 36 years and I wish to register my objections to the local plan for THREE FARM MEADOWS:-

1. Current and new evidence demands that the examination of this site/development is re-opened.

2. With the current expansion of RHS WISLEY there will be a huge increase in vehicles around Ockham, A3 and M25.

3. Delays to improvements of the M25 / J10 will worsen all traffic problems already evaluated.

4. You must consider the EU Advocate General's view on mitigation.

5. New ONS statistics indicate REDUCED HOUSING will be required in the area.

6. Additional land has been attached to the south of the site but without the full, usual public consultation.

7. Removing the site from the larger GREEN BELT the SOS GB objection is overcome but ALL the other issues/problems remain.

8. A public examination needs to be instigated to take account of new information from the Office of National Statistics.
9. Please note my profound support for the objections made on my behalf by WAG, all of which were written with advice from Richard Harwood QC.

Attached documents:

Comment: MM2 - LPMM18/39  Respondent: Mr Fridrun Williams 9298657   Agent:

I would like to add my concerns about the local plan as it stands. They have been more or less copied from other like minded citizens, who have already expressed them more succinctly and in more detail. I hope they will be taken into account in the final instance.

In order to arrive at a robust and sustainable housing target, the following measures need to be taken:

Population projections need to be calculated keeping in mind the discrepancy between the population projections for Guildford and the actual population as recorded in the 2011 Census. Taking into account the latest 2016 Based SNPP figures, the objectively assessed housing need based on demographic indicators would be reduced to 192 dwellings per annum if an appropriate allowance for UPC were to be applied.

Students are not permanent residents, as they are only here to study. As such they should not be included in the statistics used to arrive at Population Projections for Guildford or those used to generate DCLG Household Projections. Overseas students should be removed from statistics used to arrive at net international migration on the grounds that they are only here on a temporary basis to study and not to settle – especially after Brexit!

Therefore housing needs of students should be met separately from housing targets. Instead student accommodation should be built on campus and in the immediate vicinity of the campus, so students don’t have to commute. This would free up affordable housing in the town centre.

Attached documents:

Comment: MM2 - LPMM18/40  Respondent: Mr Fridrun Williams 9298657   Agent:

The Green Belt should be considered as an appropriate constraint on the supply of housing in Guildford in view of paragraph 035 in the PPG which states that - “unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”. The only reason Guildford Borough Council has given for building on the green belt is “to meet unmet housing need” and, according to the PPG, this is unacceptable.

Attached documents:

Comment: MM2 - LPMM18/72  Respondent: Mr Fridrun Williams 9298657   Agent:

Dear Planning committee,
I would like to add my concerns about the local plan as it stands. They have been more or less copied from other like minded citizens, who have already expressed them more succinctly and in more detail. I hope they will be taken into account in the final instance.

In order to arrive at a robust and sustainable housing target, the following measures need to be taken:

Population projections need to be calculated keeping in mind the discrepancy between the population projections for Guildford and the actual population as recorded in the 2011 Census. Taking into account the latest 2016 Based SNPP figures, the objectively assessed housing need based on demographic indicators would be reduced to 192 dwellings per annum if an appropriate allowance for UPC were to be applied.

Students are not permanent residents, as they are only here to study. As such they should not be included in the statistics used to arrive at Population Projections for Guildford or those used to generate DCLG Household Projections. Overseas students should be removed from statistics used to arrive at net international migration on the grounds that they are only here on a temporary basis to study and not to settle – especially after Brexit!

Therefore housing needs of students should be met separately from housing targets. Instead student accommodation should be built on campus and in the immediate vicinity of the campus, so students don’t have to commute. This would free up affordable housing in the town centre.

The Green Belt should be considered as an appropriate constraint on the supply of housing in Guildford in view of paragraph 035 in the PPG which states that - “unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”. The only reason Guildford Borough Council has given for building on the green belt is “to meet unmet housing need” and, according to the PPG, this is unacceptable.

Your sincerely,

Dr Fridrun Williams [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

Attached documents:
I would like to add my concerns about the local plan as it stands. They have been more or less cobbled together from other like minded citizens and associations, who have already expressed them more succinctly and in more detail. I hope they will be taken into account in the final instance.

In order to arrive at a robust and sustainable housing target, the following measures need to be taken:

Population projections need to be calculated keeping in mind the discrepancy between the population projections for Guildford and the actual population as recorded in the 2011 Census. Taking into account the latest 2016 Based SNPP figures, the objectively assessed housing need based on demographic indicators would be reduced to 192 dwellings per annum if an appropriate allowance for UPC were to be applied.

Students are not permanent residents, as they are only here to study. As such they should not be included in the statistics used to arrive at Population Projections for Guildford or those used to generate DCLG Household Projections. Overseas students should be removed from statistics used to arrive at net international migration on the grounds that they are only here on a temporary basis to study and not to settle – especially after Brexit!

Therefore housing needs of students should be met separately from housing targets. Instead student accommodation should be built on campus and in the immediate vicinity of the campus, so students don’t have to commute. This would free up affordable housing in the town centre.

The Green Belt should be considered as an appropriate constraint on the supply of housing in Guildford in view of paragraph 035 in the PPG which states that - “unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”. The only reason Guildford Borough Council has given for building on the green belt is “to meet unmet housing need” and, according to the PPG, this is unacceptable.

Attached documents:

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**Comment:** MM2 - LPMM18/1775  **Respondent:** Mr Fridrun Williams 9298657  **Agent:**

I am re-submitting my earlier comments below and would like to ask the Planning Inspector to re-open the examination and amend the Plan to take account of the fact that the housing figures quoted are no longer up to date. This has been demonstrated by the expert Neil MacDonald, who stated that the economic growth rate proposed by the inspector could be met by about half the proposed figures.

Therefore there is no justification of the loss of green belt. There seem to be quite a few sites which could be developed in the town centre. Why are they given over entirely to retail developments, when retail is in decline? How many more furniture shops do we need?

In addition why would Guildford have to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained?

Attached documents:

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**Comment:** MM2 - LPMM18/1038  **Respondent:** Rod Wild 9298689  **Agent:**

I OBJECT to the need to cater Woking’s unfulfilled needs.

I OBJECT to the housing requirement not being lowered in the face of the new statistics.
I OBJECT to only having a derisory reduction in the number of houses for Site A22, Keens Lane. There are so many reasons not to proceed with this development. Not only Green Belt but the number of times developments in the area have been refused because of the critical nature of the congestion on main roads A322 and A323.

In 1976, the inspector recommended: “The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded ....”.

In 1983, the County Engineer wrote to the then MP concerning the Surrey Structure Plan: "Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall".

In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended: “In my judgement, the discharge to A322/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads.”

In 2003, the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated: “The findings thus far suggest that the transport impacts associated with the north west community [the Liddington Hall site] would be significant and difficult to resolve.” These previous rulings are vital and cannot be ignored.

Attached documents:

Comment: MM2 - LPMM18/2967  Respondent: Andy White 9327201  Agent:

I would ask that the Inspector reopen the enquiry and examine the effect of the new ONS figures have on the housing numbers.

I would suggest the new figures no longer support release of Greenbelt land and specifically that the Gosden Hill site should be taken out of the plan.

Insufficient housing sites have been provided in the Town Centre.

The transport plan do not even address the acknowledged existing deficiency and with Guildford being the most congested town in the country makes the plan unsound. Unless significant improves are made it will endanger the economic viability of the Borough.

I fully support the comments by the Guildford Residents Association and the Burpham Neighbourhood Forum.

Attached documents:

Comment: MM11 - LPMM18/5183  Respondent: David Reeve 9335041  Agent:

Policy P4: Flooding, Flood Risk and Groundwater Protection Zones

MM11 – OBJECTION P4-1

Policy paragraph 3 states “Development proposals in the 'developed' flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability.” This should be reworded to ensure that the criterion of increased flood risk is not confined exclusively to the development site itself. Developments on a ‘developed’ flood zone can be designed and engineered to
adequately mitigate flood risk on the development itself, but can substantially increase the flood risk on other
neighbouring sites. Suitable re-wording is required to address this issue.

Attached documents:

Comment: MM12 - LPMM18/5184 Respondent: David Reeve 9335041 Agent:

Policy P5: Thames Basin Heaths Special Protection Area

MM12 – OBJECTION P5-1

Policy paragraph 3(d) states that “Large developments may be required to provide bespoke SANG.” This sentence is
insufficiently prescriptive for a planning Policy, and fails to meet the requirements of NPPF paragraph 154, which states
that “Only policies that provide a clear indication of how a decision maker should react to a development proposal should
be included in the plan.”

In addition the provisions of paragraph 3(d) should not have been weakened. The proposed change in the text should be
reversed.

MM12 – OBJECTION P5-2

The proposed change in Policy paragraph 4 has the effect of providing a potential waiver regarding the provisions of the
other clauses of this Policy and the Thames Basin Heaths SPA Avoidance Strategy. The correct way to achieve that
would be to amend the Avoidance Strategy itself (although that itself would be contentious and probably unacceptable).
Having an Avoidance Strategy, and also having ad hoc waivers that appear in different documents is unacceptable.

MM12 – OBJECTION P5-3

The last sentence of paragraph 4.3.50c of the reasoned justification, states that “If these residential developments provide
or contribute to appropriate SANG and SAMM measures in accordance with the Thames Basin Heaths Special Protection
Area Avoidance Strategy (the strategy), it is likely that it can be concluded that no adverse effects on the integrity of the
SPA will occur as a result of increased recreational pressure.” Unfortunately, experience indicates that it is not at all
likely that no adverse effects on the integrity of the SPA will occur; in the planning application for the former Wisley
airfield the SANG proposals were apparently regarded as acceptable despite encouraging dog walkers towards the SPA.

Attached documents:

Comment: MM15 - LPMM18/5185 Respondent: David Reeve 9335041 Agent:

Policy E3: Maintaining Employment Capacity and Improving Employment Floorspace

MM15 – OBJECTION E3-1

The town centre is the largest and the most sustainable area for development in the entire borough. It is unacceptable to
remove it from the list of Office (B1a) and Research & Development (B1b) Strategic Employment Sites.

Attached documents:
Policy E4: Surrey Research Park

MM16 – APPROVAL E4-1

The modification in Policy paragraph 1 is an improvement and is welcomed.

Attached documents:

Policy E7: Retail and Leisure Uses in Guildford Town Centre

MM18 – OBJECTION E7-1

The intention of the new paragraph 1a is probably correct, but it should not be the case that retail and/or leisure development should be permitted unconditionally. Suitable wording (or numerical limits) should be included to prevent the development of additional unnecessary excess space (especially retail) when sustainable residential development sites in the town centre are so scarce.

MM18/MM21 – COMMENT E7/E8-1

Paragraphs 4.4.85 and 4.4.89 are worded slightly differently, but appear to have the same meaning. They should be made identical in the interests of consistency.

Attached documents:

Policy S2: Planning for the borough – our spatial development strategy

MM2 – OBJECTION S2-1

Both versions of NPPF require planning authorities to base their Local Plans on data that is relevant and up-to-date (see NPPF March 2012, paragraph 158, and NPPF July 2018, paragraph 31). Current Planning Practice Guidance also specifically identifies the ONS household projections – effectively as matter of definition – as being the most robust estimates of future household growth (see PPG paragraph 005, (Reference ID: 2a-005-20180913, 13/09/2018):

“Why are household projections used as the baseline for the standard method?

Using household projections as the baseline ensures that the process begins with a clear and transparent assessment of anticipated household growth for every area. The Office for National Statistics’ projections for numbers of households in each local authority are the most robust estimates of future household growth.

The household projections are trend-based, meaning that they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not predict future growth.”
On 20/09/2018 ONS released their “2016-based household projections: detailed data for modelling and analytical purposes”. Therefore that data is the correct basis for Guildford’s Local Plan. The fact that the data only became available shortly before the present public consultation is immaterial; the planned September release of the household data was discussed during the Local Plan Examination in Public (EIP) in June/July this year. Moreover, ONS’s updated population projections (which were released on 24/05/2018, and which were also discussed in detail during the EIP) showed a very marked reduction in the projected population levels, which should have alerted the Council to the inevitable similar change in the September household projections.

Over the period between the release of draft Submission Local Plan in December 2017 and the release of the present draft which includes the Main Modifications arising from the EIP, the nominal housing target in the Plan has increased by 174 dwellings from a total (over the entire 20-year plan period from 2015 to 2034 inclusive) of 12,426 (December 2017 Submission Plan) to 12,600 (September 2018 Main Modifications Plan). In comparison, the corresponding official projected household figures have decreased by 4,507 dwellings from a total 11,142 (used in the December 2017 draft Plan) to 6,635 (in the September 2018 draft Plan), as shown in the following table. This is a reduction of 40%.

<table>
<thead>
<tr>
<th>Year</th>
<th>2014-based (DCLG)</th>
<th>2016-based (ONS)</th>
<th>Change in Projected Guildford Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>56,055</td>
<td>54,988</td>
<td>-1,067</td>
</tr>
<tr>
<td>2034</td>
<td>67,197</td>
<td>61,623</td>
<td>-5,574</td>
</tr>
<tr>
<td>Growth</td>
<td>11,142</td>
<td>6,635</td>
<td>-4,507</td>
</tr>
</tbody>
</table>

In this situation (and irrespective of any subsequent adjustments for affordability, Woking’s unmet need, student accommodation, economic growth etc) it is clear that the housing requirement is based on an out-of-date household projection, is incorrect, and that the Plan is therefore unsound. Note that the extent of this error is 1 to more than two of the strategic sites, or 35.8% (4,507 / 12,600) of the housing requirement of the entire Plan.

**MM2 – OBJECTION S2-2**

In addition to the errors in the underlying household projections for Guildford identified in Objection S2-1, a similar situation applies to the Woking household projections, as presented below. The table shows that Woking’s household growth between 2015 and 2034 (inclusive) is now projected to be 2,959 households fewer than was originally projected (ie. a drop of 48%). The inclusion in Policy S2 of an annual housing increment of 42 dwellings per year between 2019 and 2034 to support part of Woking’s unmet need is therefore also flawed and unsound.

<table>
<thead>
<tr>
<th>Year</th>
<th>2014-based (DCLG)</th>
<th>2016-based (ONS)</th>
<th>Change in Projected Woking Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>39,777</td>
<td>39,540</td>
<td>-237</td>
</tr>
<tr>
<td>2034</td>
<td>45,932</td>
<td>42,736</td>
<td>-3,196</td>
</tr>
</tbody>
</table>
Given the very large discrepancies between the levels of housing proposed in the Plan and the ONS household data released on 20th September 2018, the Public Examination of the Plan by the Planning Inspector must be re-opened.

As a result of the changes to the housing figures identified in Objections S2-1 and S2-2 above, the equivalent of at least two strategic sites should be removed from the plan. In addition, Objection S3-2 to modification MM3 (below) demonstrates that over 60% of the housing proposed in the Plan would be destined to be built on land that is currently in the Green Belt. A major review of all Green Belt sites in the Plan should therefore be undertaken to align the planned level of housing delivery with the up-to-date household figures. In particular, the review should include (but not limited to):

- Site A25 (Gosden Hill Farm)
- Site A26 (Blackwell Farm)
- Site A26a (land for an access road to Blackwell Farm)
- Site A35 (former Wisley airfield)
- Site A43 (Garlicks Arch).

Following the Planning Inspector’s Examination of the Local Plan in June/July 2018, five new sites were included in the Plan, for the purpose of accelerating early delivery of housing. In the light of the recent changes to the household projections detailed in Objections S2-1 and S2-2 above, the new sites (listed below) should be removed from the Plan.

- Site A43: Land at Garlick’s Arch, Send Marsh (an additional 150 dwellings)
- Site A61: Land at Aaron’s Hill, Godalming (200 dwellings)
- Site A62: Land at Hornhatch Farm, adjoining New Road, Chilworth (80 dwellings)
- Site A63: Land west of Alderton’s Farm, Send Marsh Road, Send (120 dwellings)
- Site A64: Land between Glaziers Lane and Strawberry Farm, Flexford (105 dwellings)

Comment: MM23 - LPMM18/5188  Respondent: David Reeve 9335041  Agent:
Policy paragraph 13 should include and additional sentence as follows:

(e) facilitates the installation of charging units for electric vehicles.

Policy D4: Character and Design of New Development

MM23 – OBJECTION D4-1

This Policy seems to be eminently sensible, but has been deleted. Unless all its provisions have been fully included elsewhere, it should be retained in full.

Attached documents:

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**Policy D2: Sustainable Design, Construction and Energy**

MM24 – OBJECTION D2-1

Policy paragraphs 4, 5, 6 and 7 are good in their intent, but there will be many development sites in the borough where there is no neighbouring (C)CHP scheme, or where the scale of the development is too small to justify a new scheme. In these cases, the Policy should give explicit encouragement to the consideration of ground-source or air-source heat pump solutions, which are likely to be the most energy efficient of all heating schemes.

MM24 – OBJECTION D2-3

As currently drafted, Policy paragraph 10 and Definitions paragraph 4.5.30 provide developers of retail facilities with a complete waiver of responsibility for the climate change impacts of their developments. This is totally unacceptable, especially considering the profligate way in which many retail businesses blast warm air from their doorways into the street.

Attached documents:

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**Policy ID1: Infrastructure and Delivery**

MM26 – OBJECTION ID1-1

Comment: MM26 - LPMM18/5191  Respondent: David Reeve 9335041  Agent:
Policy paragraph 5a states “Where an applicant advises that their development is unviable with the Policy and infrastructure requirements, the Council will consider whether these costs were taken into account in the price paid for the site (or any agreement to purchase the site). If these costs were taken into account, as is required by the Council, but there are higher costs associated with the site that were unknown at this time, then the Council will take this factor into account when considering the viability and acceptability of the proposal”. In essence, this paragraph provides developers with a device that insulates their profits from normal business risk. I am not aware of any other businesses that are indemnified against errors in their investment decisions and in their risk management procedures in this way. This is completely unacceptable and deserves no place in Guildford’s Local Plan.

Attached documents:

Comment: MM27 - LPMM18/5192  Respondent: David Reeve 9335041  Agent:

Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”

MM27 – COMMENT ID2-1

Typo: replace “licenced” by “licensed”.

Attached documents:

Comment: MM3 - LPMM18/5180  Respondent: David Reeve 9335041  Agent:

Policy S3: Delivery of Development and Regeneration within Guildford Town Centre

MM3 – OBJECTION S3-1

This Policy attempts to fill an uncomfortable gap that existed in previous drafts of the Local Plan, and is therefore welcome on that basis.

However, it consists almost entirely of aspirational wording without specifying anything concrete in terms of what is planned for the town, whereabouts it is planned, or when it is proposed that it should happen. For example, the Policy applies to the “town centre” but makes no reference to any map that defines the geographical extent of the Policy. As such it signally fails to contain the minimum necessary tangible information that is required in order for it to be considered as a credible Policy in a Local Plan. It also fails to meet the requirements of NPPF (March 2012) paragraph 154 that “Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.” As such, the Plan is unsound.

MM3 – OBJECTION S3-2

As part of the “Reasoned Justification”, paragraph 4.1.21 states that “Whilst the Local Plan provides for sufficient sites to meet housing needs over the plan period, as part of regeneration efforts, more housing is likely to come forward over the plan period.” Table S2b of the Plan is reproduced below with an extra column identifying sites that are currently in the Green Belt. The table shows that 66% of the planned housing in the Local Plan (excluding existing permissions & completions, windfalls and rural exception housing) is destined to be built on land that is currently in the Green Belt. If there is confidence that additional housing proposals will come forward during the plan period, then
the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist (let alone the situation prevailing in this Plan, where a clear majority of the development is proposed on land that is currently in the Green Belt).

Table S2b: Spatial Strategy: Distribution of Housing 2015 – 2034 (net number of homes)

<table>
<thead>
<tr>
<th>Spatial locations / settlements</th>
<th>Homes (Site allocations + non-allocated LAA sites, excluding permissions and completions)</th>
<th>Currently in Green Belt?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford town centre</td>
<td>863</td>
<td>–</td>
</tr>
<tr>
<td>Urban areas</td>
<td>1,443</td>
<td>–</td>
</tr>
<tr>
<td>Guildford (incl. SARP)</td>
<td>1,399</td>
<td>–</td>
</tr>
<tr>
<td>Ash and Tongham</td>
<td>44</td>
<td>–</td>
</tr>
<tr>
<td>Within villages</td>
<td>154</td>
<td>154</td>
</tr>
<tr>
<td>Land proposed to be inset in villages</td>
<td>252</td>
<td>252</td>
</tr>
<tr>
<td>Previously Developed Land in Green Belt</td>
<td>195</td>
<td>–</td>
</tr>
<tr>
<td>Countryside beyond the Green Belt:</td>
<td></td>
<td>–</td>
</tr>
<tr>
<td>Extension to Ash and Tongham</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Urban extensions to Guildford</td>
<td>3,350</td>
<td>3,350</td>
</tr>
<tr>
<td>Gosden Hill Farm</td>
<td>1,700</td>
<td>1,700</td>
</tr>
<tr>
<td>Blackwell Farm</td>
<td>1,500</td>
<td>1,500</td>
</tr>
<tr>
<td>Land north of Keens Lane</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Urban extension to Godalming</td>
<td>200</td>
<td>–</td>
</tr>
<tr>
<td>----------------------------------------------------------</td>
<td>-----</td>
<td>----</td>
</tr>
<tr>
<td>Aaron’s Hill</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New settlement</td>
<td>2,000</td>
<td>2,000</td>
</tr>
<tr>
<td>Former Wisley Airfield</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development around villages</td>
<td>1,250</td>
<td>1,250</td>
</tr>
<tr>
<td>Total</td>
<td>10,592 *</td>
<td>7,006 (66.1%)</td>
</tr>
</tbody>
</table>

*This total excludes trend based housing supply (Windfall and rural exception) as well as completions and permissions, whether allocated or not

Moreover, during the EIP the Council categorically stated that an absence of suitable sites being available in the early part of the plan period had led to a Plan in which much of the early development would be located on sites at the bottom of the hierarchy, and in the most unsustainable locations. Under such circumstances, how can a very substantial “take” of Green Belt be justified when the Local Plan glibly talks about additional housing coming forward in town centre – which is the most sustainable are in the entire borough?

The Plan is unsound.

**Attached documents:**

**Comment:** MM35 - LPMM18/5193  **Respondent:** David Reeve 9335041  **Agent:**

**Policy A25: Gosden Hill Farm, Merrow Lane, Guildford**

**MM35 – OBJECTION A25-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the equivalent of at least two strategic sites should be removed from the Plan in accordance with Objection S2-3 above. This review should include Site A25 (Gosden Hill Farm).

**Attached documents:**

**Comment:** MM36 - LPMM18/5194  **Respondent:** David Reeve 9335041  **Agent:**

**Policy A26: Blackwell Farm, Hogs Back, Guildford**

**MM36 – OBJECTION A26-1**
Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the equivalent of at least two strategic sites should be removed from the Plan in accordance with Objection S2-3 above. This review should include Site A26 (Blackwell Farm).

Attached documents:

**Comment:** MM37 - LPMM18/5196  **Respondent:** David Reeve 9335041  **Agent:**

**Policy A26a: Land for access to Blackwell Farm, Hogs Back, Guildford**

**MM37 – OBJECTION A26a-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the equivalent of at least two strategic sites should be removed from the Plan in accordance with Objection S2-3 above. This review should include Site A26a (land for an access road to Blackwell Farm).

Attached documents:

**Comment:** MM39 - LPMM18/5200  **Respondent:** David Reeve 9335041  **Agent:**

**Policy A61: Land at Aaron’s Hill, Godalming**

**MM(undefined) – OBJECTION A61-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the increase in housing provision following the Planning Inspector’s examination of the Local Plan should be reversed in accordance with Objection S2-4 above. This review should include Site A61 (Land at Aaron’s Hill, Godalming – 200 dwellings).

Attached documents:

**Comment:** MM40 - LPMM18/5197  **Respondent:** David Reeve 9335041  **Agent:**

**Policy A35: Former Wisley Airfield, Ockham**

**MM40 – OBJECTION A35-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the equivalent of at least two strategic sites should be removed from the Plan in accordance with Objection S2-3 above. This review should include Site A35 (former Wisley airfield).

**MM40 – OBJECTION A35-2**

On 13th June 2018 the Secretary of State published his decision to uphold the Councils’ decision to refuse permission for the Wisley Airfield planning application (15/P/00012), and the applicant’s planning appeal was dismissed. Notwithstanding some amendments to the submissions of some of the statutory consultees, it is nevertheless
extraordinary that as little as three months later the Local Plan – including Policy A35 for a development of essentially the same scale as that rejected by the Secretary of State – should be submitted for a public consultation, and when the official household projections on which the Local Plan was based had been reduced by 40% (see Objection S2-1 to MM2 above). The public perception of this situation can only be that it is bizarre and perverse.

**MM40 – OBJECTION A35-3**

In all previous versions of the Local Plan the area designated as a Site of Nature Conservation Importance (SNCI) covered the entire proposed development site, whereas the current Plan shows the area of the SNCI as being only about 15 – 20% of its earlier size (according to my visual estimation from the map). Moreover about a third of that remaining area of the SNCI includes a zone that is “safeguarded land for waste” (which I believe is covered in the Surrey Waste Plan), so in the long term the area of SNCI is likely to be further reduced.

According to GBC’s Sites of Nature Conservation Importance Surveys (2004 –2007), the SNCI boundary was last amended at meeting of the Surrey Nature Conservation Liaison Group (SNCLG) in March 2007. At that time the “boundary was extended following advice and survey information from Surrey Amphibian & Reptile Group. The document states that “This site is selected for its importance for reptiles, plants and birds. 9 notable Surrey plant species have been recorded on the site. In addition 3 RSPB red list bird species and 7 RSPB amber list bird species have been recorded on the site. The site has an exceptional or good population of a number of reptiles and amphibians.”

In the light of the currently-proposed reduction in the size of the SNCI, the obvious question is “What has changed in the last eleven years to justify a reduction in the area which more than reverses the extension that was considered appropriate in 2007?” It is difficult to believe that this reduction is unconnected with a desire on the part of the Council to allocate the site for development, however the Requirements section of Policy A35, paragraph 10(a) states that “Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.” In my opinion this sort of Orwellian doublespeak is little short of disgraceful when it is apparently intended to emasculate the SNCI, and it deserves no place in document produced by a public authority.

Attached documents:

**Comment: MM41 - LPM18/5198**  **Respondent:** David Reeve 9335041  **Agent:**

**Policy A43: Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley**

**MM41 – OBJECTION A43-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the equivalent of at least two strategic sites should be removed from the Plan in accordance with Objection S2-3 above. This review should include Site A43 (Garlick’s Arch).

**MM41 – OBJECTION A43-2**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the increase in housing provision following the Planning Inspector’s examination of the Local Plan should be reversed in accordance with Objection S2-4 above. This review should include Site A43 (Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley -- an uplift of 150 dwellings).

Attached documents:

**Comment: MM43 - LPM18/5201**  **Respondent:** David Reeve 9335041  **Agent:**
Policy A62: Land at Hornhatch Farm, adjoining New Road, Chilworth

**MM(undefined) – OBJECTION A62-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the increase in housing provision following the Planning Inspector’s examination of the Local Plan should be reversed in accordance with Objection S2-4 above. This review should include Site A62 (Land at Hornhatch Farm, adjoining New Road, Chilworth – 80 dwellings).

**Attached documents:**

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Comment: MM44 - LPMM18/5202  Respondent: David Reeve 9335041  Agent:

Policy A63: Land west of Alderton’s Farm, Send Marsh Road, Send

**MM(undefined) – OBJECTION A63-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the increase in housing provision following the Planning Inspector’s examination of the Local Plan should be reversed in accordance with Objection S2-4 above. This review should include Site A63 (Land west of Alderton’s Farm, Send Marsh Road, Send – 120 dwellings).

**Attached documents:**

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Comment: MM45 - LPMM18/5203  Respondent: David Reeve 9335041  Agent:

Policy A64: Land between Glaziers Lane and Strawberry Farm, Flexford

**MM(undefined) – OBJECTION A64-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), the increase in housing provision following the Planning Inspector’s examination of the Local Plan should be reversed in accordance with Objection S2-4 above. This review should include Site A64 (Land between Glaziers Lane and Strawberry Farm, Flexford – 105 dwellings).

**Attached documents:**

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Comment: MM6 - LPMM18/5181  Respondent: David Reeve 9335041  Agent:

Policy H2: Affordable Homes

**MM6 – OBJECTION H2-1**

Paragraph 2a of the Policy states: “In Designated Rural Areas, the threshold where we will seek an affordable housing contribution of at least 40% of the homes on these sites will be on sites providing more than 5 dwellings. For
developments of between 6 and 10 dwellings inclusive (gross), or where dwellings have a combined gross internal floorspace of more than 1,000 square metres, a financial contribution in lieu of on-site provision of affordable housing will be sought which is of broadly equivalent value relative to on-site provision.” The notion that developers can “buy out” of an obligation that would otherwise provide affordable homes is unacceptable.

**MM6 – COMMENT H2-2**

Paragraph 4.2.42 of the reasoned justification leaves the position undefined for fractional homes in the range between 0.4 and 0.5. The text should be amended to state “we will therefore round up any part requirement of an affordable housing dwelling in line with common convention at 0.5 of a home, and down at 0.499 or less.”

**Attached documents:**

**Comment: MM9 - LPMM18/5182  Respondent: David Reeve 9335041  Agent:**

**Policy P2: Green Belt**

**MM9 – COMMENT P2-1**

Given the excess number dwellings proposed in the Local Plan (see Objection S2-1 to modification MM2), and the disproportionate usage of Green Belt land for residential development (see Objection S3-2 to modification MM3), a major review of the Local Plan is required, including a global review of the need to inset villages.

**MM9 – COMMENT P2-2**

Under “Limited Infilling” East Horsley appears in both c(i) and in c(ii), which is presumably incorrect.

**Attached documents:**

**Comment: MM2 - LPMM18/5311  Respondent: Carol Herzig 9408833  Agent:**

Re: Objection to MM2

I am writing to ask you to reconsider the fact that new figures have been produced by the Office for National Statistics which mean that the figures in MM2 for Guildford of 672 extra homes per year are no longer up to date, being over inflated and excessive. If the newly-produced figures of 360 extra homes per year were adopted, it would enable the planners to reconsider which sites should be used and remove a strategic Green Belt site from the plan. The Blackwell Farm site, which adjoins the Surrey Hills AONB could therefore be removed from the Plan, as the road infrastructure of the area will not support the additional homes planned. The development of the planned extra homes will lead to increased congestion of the A31/A3 junction area, an already overcrowded and frequently problematic junction. The considerations of aesthetic beauty, nature conservation and preservation of the Hogs Back skyline are also exceedingly important to the residents of Guildford, like myself.

These newly-published figures also make table S2b out of date and MM3 inadequate and in need of re-examination. The new lower figure of 360 homes would make it much more achievable for the Council to bring forward well-planned, sensitively designed housing in the town centre in a more considered, long-term way.

I ask you to urgently reconsider your use of the Blackwell Farm site in the MM2, in the light of this recent publication of the figures by the Office for National Statistics.
I look forward to receiving your reply.

Attached documents:

**Comment:** MM2 - LPMM18/4867  **Respondent:** Guildford Vision Group (John Rigg) 9531041  **Agent:**

**Submission Local Plan: Strategy and Sites - Main Modifications**

I write in response to the consultation on the Main Modifications to the Submission Local Plan: Strategy and Sites document on behalf of Guildford Vision Group (GVG).

As you are aware GVG has been an active participant throughout the regulation 18 and regulation 19 consultations. GVG also submitted a pre-hearing statement to the Planning Inspectorate in advance of the examination and subsequently participated in a number of the hearing sessions.

In summary GVG raised a number of critical issues during the regulation 18 and regulation 19 consultations, and also during the examination which can be summarised as follows:

- Not addressing the settlement hierarchy in formulating the plan and lack of a 'brownfield first' approach.
- Lack of proper town centre policies within the plan. Failure to meet the test of exceptional circumstances by the council in order to justify the release of green belt.
- Lack of development sites identified in Guildford Town Centre and wider urban area and in contrast to the sites identified in the 2017 Guildford Town Centre Regeneration Plan (plans attached at Appendix 4).
- Failure to address provision of infrastructure across the borough within the Local Plan, with only limited plans to address the poor infrastructure in the town centre.
- The suitability of the housing trajectory and the suitability of green belt sites to deliver housing.
- Lack of delivery of a wide variety of homes across the local plan area.
- Overprovision of retail space on the North Street site in relation to the established evidence base.
- Lack of policies for the town centre to address the broad spectrum of issues the town centre faces. Importantly there is no attempt to bring forward policies to promote masterplanning the town centre to provide a joined up approach to infrastructure, spatial strategy, resilience (Flood Prevention, Water and Sewerage, Power etc.).

The council has gone some way to addressing points raised by the Group. The changes as set out in the Main Modifications document do not go anywhere near far enough. On this basis, GVG is firmly of the opinion that the plan, in its current form (including the main modifications) remains unsound.

In the years leading up to the examination and throughout the hearing sessions, GVG sought to work proactively with the council to identify solutions concerning the town centre and wider urban area. As part of its involvement in the hearing sessions, GVG prepared a draft Statement of Common Ground which was submitted to the council in May 2017 (Appendix 5). Despite submitting this to the council, with a copy to the Inspector, no further response to this was received even though SOCGs have clearly been agreed with other parties involved in the process.

Since the hearing sessions, GVG has continued to meet as a group and most recently, on 16 October, held a public meeting, to receive an update on plan progress, particularly an update on Policy S3, in Guildford with around 150 residents attending. An exit poll at the meeting showed 94% were not confident about the outlook for Guildford and town planning, 89% supported more pedestrianisation, and 93% agreed that the council should address infrastructure issues in the town centre, including safeguarding a route for a new crossing of the railway & river if no other solution is available. The meeting was streamed to the SurreyLive website where over 8500 ‘hits’ have been registered for the video of the event.
The Procedural Practice in the Examination of Local Plans issued by the Planning Inspectorate (June 2016 4th Edition v.1) deals specifically with 'Post-Submission Changes Initiated by the LPA' and specifically states at paragraph 5.22 that: The consultation on the proposed change may generate new representations. If so, in the interests of fairness, the Inspector will provide an opportunity to appear at the hearings to those who seek an amendment which follows directly from the LPA’s proposed post-submission change(s)10 to the plan.

GVG is firmly of the opinion that it is necessary to re-open the examinations in the interests of fairness so that further evidence can be heard from GVG and others (including The Guildford Society) on the inadequacies of the modifications proposed.

Turning to the main modifications as proposed by the council, GVG has split the response in to the relevant sections and these will be taken in turn. GVG has not sought to comment on the modifications to the Housing or Protecting Policies within the plan. This is because there are more serious issues with the soundness of the plan, particularly around the town centre and the use of brownfield land.

**MM2 - Policy S2: Planning for the borough - our spatial development strategy**

The council has now selected a flat housing trajectory of 630 dwellings per annum over the plan period (2015-2034) following commentary from the inspector during examination. This trajectory is welcomed as it avoids the stepped Liverpool housing trajectory which was previously being promoted by the council and which the inspector had said would not be a sound approach. In order to deliver a flat housing trajectory it is also recognised that the council has had to make the difficult decision to allocate further additional sites in order to satisfy the requirements of early delivery. However, the flat trajectory still spreads the historic undersupply across the plan period (Liverpool method) which remains contrary to government advice and is likely to require further justification through additional hearing sessions on why the backlog cannot be met in the early plan period.

It is however notable that no town centre sites were considered as suitable candidates for early delivery of housing. Whilst the deliverability constraints of brownfield sites in urban areas is recognised by GVG, there are numerous examples of sites, such as surface car parks within the ownership of GBC, that could be made available for further early delivery. Several of these sites were fully identified by the council themselves in the 2017 Regeneration Strategy (Appendix 4). No evidence has been provided by the council that any consideration has been given towards any additional town centre sites above those previously identified by the council in the Local Plan.

The wording of part 2a) of policy S2 still refers to 41,000 sq m of comparison retail floorspace (gross) provision across the plan period. Our previous comments that were set out in our regulation 19 consultation response and pre-hearing submissions are still relevant in this regard. It is noted that the proposed 41,000 sq m of comparison retail floorspace proposed at North Street is only marginally reduced from the allocation in the May 2014 draft plan and is the same for the total borough-wide floorspace capacity for comparison shopping and food and beverage uses as set out at para 4.40 in the Retail and Town Centre Topic Paper up to 2030.

The rationale for including this quantum of retail floor space in a single location within Guildford at North Street remains unclear and is even less logical in light of recent trends in retail across the UK. The wording of policy 2a is also at odds with the wording of Policy A6: North Street where the wording of the allocation has been modified to say 'approximately' rather than 'minimum' and it is suggested that wording elsewhere in the plan which relates to retail space is reworded in a similar way, including a material reduction in quantum.

Table S2b: Spatial Strategy: Distribution of Housing 2015 - 2034 (net number of homes) shows that 10,592 homes are allocated across the GBC area, of which 2,306 (22%) are in the town centre and wider urban area, and only (863 - 8%) are in the town centre. This is analogous of the fact that the entire spatial strategy does not take a brownfield first approach as advocated by the council.

During the local plan hearing sessions, GVG submitted a document to the council which compared the site allocations in the town centre in the submission local plan to those identified within the GVG masterplan. No further consideration has been given to how these sites could be incorporated into the spatial strategy or even be considered as candidates for early delivery to meet the significant backlog as identified.
Comment: MM23 - LPMM18/4870  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

**MM23 - Policy D1: Place shaping**

GVG assumes that Guildford, as a borough, will need to grow to ensure its economic future. Thus it is essential the local plan will ensure delivery of high-quality amenity space, places and buildings. Paragraph 4.5.8e of the reasoned justification supporting policy D1 makes reference to the Corporate Plan (2018-2023) where the latter identifies the regeneration of the town centre and other urban areas as one of three strategic priorities in the 'place making' theme. The Corporate Plan is internally produced by the council. It is important that matters driving strategic priorities are placed front and centre in the Local Plan and a commitment is made by the council which cannot be subject to political change at a later date. Since issuing S3 for consultation, it is noted that Policy D4: Character and design of new development has been deleted with some of the policies transferred into D1, but not all of them. There is no nowhere in the plan where there are any simple guidelines for mass and scale to protect Guildford in the absence of more carefully formulated policies. Whilst it is anticipated that an element of these should come through in the subsequent Development Management DPD, it would be detrimental to allow a policy vacuum to exist until these policies were adopted, which is some years away.

Attached documents:

Comment: MM23 - LPMM18/4877  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

**Appendix 2 - Policy D1: Place shaping**

**Introduction**

4.5.1 The design of the built environment has a direct effect upon how places are used. The relationship between buildings, spaces and landscape as well as detailed design and materials are all relevant factors. Good design will influence how people move around our settlements, how they interact and how places make people feel. We place a high value on the importance of good design in the built environment and making places better for people. It is important and fundamentally affects people’s lives on a day to day basis.

The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.

4.5.2 The NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live

The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.
and work and helps make development acceptable to communities. Urban design and architecture can contribute to health outcomes through encouragement of more active lifestyles. Development should be encouraged to create places that create mixed communities catering for the needs of different types of people, including the young and old, encourage walking and cycling, improve access to public transport, and ensure that new development connects with existing parks and open spaces for recreation. Building exteriors and public realm should be designed in a way that contributes to pedestrian friendly environments.

4.5.3 We need to accommodate growth over the plan period including the provision of sufficient residential and economic development in order to meet identified needs as outlined elsewhere in this Plan.

The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.

4.5.4 It will be important to ensure that new housing and employment areas are designed to respect the existing character of the borough, and create great places for people to live in or use. The development of the strategic sites offers the opportunity of creating their own identity and character.

Who is the arbiter of good design as there is no evidence that GBC are capable of judging this?

4.5.5 Through detailed design considerations we can ensure that design quality is an important consideration in the planning process, but we also have an opportunity now to ensure strategic design considerations are in place. The following policy seeks to provide a strategic framework of requirements to achieve this, to be augmented through a more detailed design policy at a later stage.

POLICY D1: Place shaping

(1) All new developments must achieve high quality design and enhance the environment in which they are set.

(2) Residential developments of 25 or more dwellings should:
   (a) provide a harmonious, integrated mix of uses, where appropriate, that fosters a sense of community and contributes to inclusive communities that provide the facilities and services needed by them
   (b) provide places for communities to meet and interact, such as play and recreation and other public spaces

It is noted that these matters have been struck out of the latest policy – surely, they are fundamental and should be included within 3 below.

All of these matters are fundamental in the town centre. The policies listed here should apply in the town centre through identifying regeneration areas as strategic sites. Commercial and Leisure Space also shapes spaces – so why is this left out?
(c) be designed to facilitate and promote walking, providing a high-quality environment for pedestrians, and where possible allowing short walking distances to amenities.

(d) Create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate, and feel safe during the day and night, and

(e) be designed to facilitate the delivery of high-quality communications infrastructure to support sustainable modern living, and

(f) provide convenient and safe routes through the development and to nearby areas for pedestrians and cyclists.

(3) All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. Essential elements of place making include creating economically and socially successful new places with a clear identity that promote healthy living; they should be easy to navigate, provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear thought given to the interrelationship of land use to external space.

ADD Schemes must make provision for Infrastructure facilities e.g. Health Care Facilities, Education Establishments and Cultural Facilities.

(4) All new development is expected to have regard to and perform positively against the recommendations set out in the latest Building for Life guidance and conform to the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG).

(5) New development shall be of a high quality and inclusive design, as per the Design Guide Supplementary Planning Document (SPD), and all new development will be required to address the following; Design Guide Supplementary Planning Document (SPD) – it is not clear what this is and doesn’t appear to exist?

Distinct local character

(6) All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting. Proposals will take account of local design guidance contained within conservation area appraisals, DPD’s, neighbourhood plans and SPDs.

This paragraph would not apply in several areas across the town centre and wider area as there is no distinct local character.

(7) Given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally
distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.

### Safe, connected and efficient streets

(8) All new development will be designed to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces. Particular regard shall be given to maximise opportunities for pedestrian and cycle movement and the creation of a high-quality public realm. **Should this cover modal separation wherever possible.**

### Network of green spaces and public places

(9) All new development will be designed to maximise the opportunity for and linkages between green spaces and public places and include high quality landscaping that reflects the local distinctive character.

### Crime prevention and security measures

(10) All new development will be designed to reduce opportunities for crime and antisocial behaviour.

### Access and inclusion

(11) All new development will be designed to meet the needs of all users, this includes the setting of the building in the wider environment, the location of the building on the plot, the gradient of the plot, transport infrastructure and public realm.

### Efficient use of natural resources

(12) All new development will be designed with regard to efficient use of natural resources including passive solar gain to maximise the use of the sun’s energy for heating and cooling. **Not clear should does this cover PV cell arrays.**

### Infrastructure to create smart places

(13) All new development will be designed in a manner that:
| (a) supports technological and digital advances, including the provision of sufficient ducting space for future digital connectivity infrastructure; | Add that Policy S3 Town Centre should be also considered as a Strategic Site and that the Council and Partners is required to produce a Masterplan covering a development programme for next 15-20 years. |
| (b) seeks to achieve high quality digital connectivity, enabling Fibre To The Premises (FTTP) where practical; | Why is North Street Left out as it appears as a Strategic Site 4.1.9? |
| (c) enables mobile connectivity within the development; | Also Masterplans for Strategic sites need to accommodate infrastructure resulting from Transforming Guildford's town centre and future continues - “We have also commissioned David Lock Associates to produce a Strategic Development Framework, which will look at overall high level master planning for strategic sites in the borough, including their connections to and from the town centre.” |
| (d) provides access to services from a range of providers. | Strengthen Adaptive and Resilient to include phrases that building can be repurposed or their use changed without major impact on the surrounding built environment |

**(14)** Further innovation and provision for 5G, Wifi and other technologies will be encouraged.

**Masterplans for strategic sites**

(15) Developers will be required to produce Masterplans for Slyfield Area Regeneration Project (A24), Gosden Hill Farm (A25), Blackwell Farm (A26) and the former Wisley airfield (A35) and these will be subject to assessment by a Design Review Panel. The masterplanning process shall engage with the local community.

Add that Policy S3 Town Centre should be also considered as a Strategic Site and that the Council and Partners is required to produce a Masterplan covering a development programme for next 15-20 years.

Why is North Street Left out as it appears as a Strategic Site 4.1.9?

Also Masterplans for Strategic sites need to accommodate infrastructure resulting from Transforming Guildford's town centre and future continues - “We have also commissioned David Lock Associates to produce a Strategic Development Framework, which will look at overall high level master planning for strategic sites in the borough, including their connections to and from the town centre.”

(16) In order to ensure future cohesive and vibrant neighbourhoods, they must demonstrate how the development responds to the immediate context as well as;

| (a) Creates functional places
| (b) Supports mixed use tenures
| (c) Includes successful public spaces
| (d) Is adaptive and resilient
| (e) Has a distinctive character

Strengthen Adaptive and Resilient to include phrases that building can be repurposed or their use changed without major impact on the surrounding built environment
(f) Is attractive  

(g) Encourages ease of movement  

(h) Creates a sustainable environment in relation to access to services and facilities  

(17) Planning applications will be consistent with the Masterplans, which must be kept under review.  

**Use of Design Review Panel**  

(18) In addition to the strategic sites, the Council will expect other large schemes to be subject to assessment by a Design Review Panel. Public consultation will also be required as part of this process, including consultation and engagement as part of the design process.  

**Villages**  

(19) Proposals for new development within villages will have particular regard to;  

(a) The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape  

(b) Important views of the village from the surrounding landscape  

(c) Views within the village of local landmarks  

**Ash & Tongham**  

(20) In order to avoid piecemeal development and to protect and enhance the existing character of Ash & Tongham and Ash Green, proposals within the area will have particular regard to;  

(a) The relationship and connectivity with the existing urban area  

(b) The relationship and connectivity between allocated sites in different ownerships  

(c) The existing character of Ash & Tongham and Ash Green
(d) The future urban edge and its relationship with the surrounding countryside at the allocated site’s boundaries

**Definitions**

4.5.6 Local landmarks are prominent buildings within the village such as churches, village schools, public houses and war memorials. This is not an exhaustive list and does not exclude other buildings being referred to as local landmarks as it will differ between villages. Accessible places are those where the public would reasonably have access, and which make provision for safe and convenient access by people with disabilities.

**Reasoned justification**

4.5.7 It is important that we set out how we will plan positively to achieve very high-quality design for all developments. The NPPF requires the inclusion of a robust policy for design quality and states that permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions. This policy forms the strategic element with more detailed policy to follow as we prepare the Development Management Policies DPD.

4.5.8 We want to create places that we can be proud of, that are inclusive and promote community and healthy living. We are keen to encourage a mix of uses, particularly on larger sites, but also on smaller sites. This provides the potential to create places where services and facilities are readily accessible to residents, in particular through walking or cycling. We want to create places that allow access to facilities and support the use of sustainable modes of transport. The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.

4.5.8a We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design. This should include taking account of the existing grain and street patterns and established building lines, local building vernacular and considering the effects upon views, topography, natural features, skylines, landscape setting and character, and the setting of designated and non-designated heritage assets. The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected. Balanced with this is a requirement to develop with flair, imagination and style, The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.
reflecting our position as a regional centre and County town. These design considerations will be set out in more detail in the Development Management Policies DPD. This approach is not confined to our urban areas but will be applicable throughout the borough.

4.5.8b Historically, development has been focused in the urban areas of Guildford and Ash and Tongham. The Plan identifies a number of strategic sites for development and we will expect masterplans for these sites to be produced as part of the planning process.

4.5.8c Development in the villages has been limited due to the Green Belt designation which previously washed over all but one of the villages. Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate. In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies.

4.5.8d Regard will be had to various Council documents in assessing the design of new development to ensure that it provides positive benefit in terms of landscape and townscape character, and enhances local distinctiveness. This includes the Residential Design Guide SPD and the Landscape Character Assessment (LCA). The LCA explores how change through built development and land management can be guided to protect, conserve and enhance the landscape character of the borough from the rural countryside to the townscape in the urban centres.

4.5.8e Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its “Place Making” theme.

Development within Guildford Town Centre will need to have regard to a very particular set of circumstances and this policy should be read in conjunction with Policy S3: Delivery of development and urban regeneration within Guildford Town Centre.

4.5.8f Innovation is a fundamental theme of the Council’s Corporate Plan and the creation of smart places infrastructure across Guildford is a priority. In this regard, the Plan identifies the need for potential future technological and digital advances to be taken into account in planning, regeneration and development decisions.
4.5.8g The greater part of urban Guildford has good broadband and mobile phone signal connectivity. However, digital connectivity has been identified as a challenge by business, particularly in rural areas. Furthermore, because of the reliance on copper wire connections from street cabinets for many subscribers, download and upload speeds vary greatly.

4.5.8h The Council considers it essential that new development is planned and designed to enable appropriate digital infrastructure and to be at the forefront of advances in broadband technology. Doing so will help ensure that Guildford borough remains a highly attractive location for businesses and residents alike and development supports delivery of the Government’s Industrial Strategy.

4.5.8i A flexible, but ambitious approach is regarded as appropriate in achieving development that supports innovation and is responsive to the rapid rate of change in relation to digital technology. The provision of FTTP is viewed a desired default technology, however it is recognised that this may not be practical in all cases. Similarly, the Council’s aspiration is that connectivity speeds of at least 1Gbps offered by full, symmetric FTTP could be achieved. FTTP and high-quality connectivity will thus be encouraged in relation to new development, and particularly at development of major residential and employment sites.

4.5.8j The Council will be working closely with external strategic partners like Superfast Surrey, and Network Rail to optimise fibre network interventions, including enabling the use of “dark” (unlit) fibre and to promote further innovations relating to improving digital connectivity.

Attached documents:

**Comment:** MM26 - LPMM18/4871  **Respondent:** Guildford Vision Group (John Rigg) 9531041  **Agent:**

**MM26 - Policy ID1: Infrastructure and delivery**

The introduction to this policy states Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality. The policy needs to be far more robust in seeking to plan infrastructure for the town centre where pollution, accidents and congestion are rife. Co-ordinated developer contributions are likely to be a suboptimal delivery mechanism. A true masterplan for Infrastructure, including alignment of Network Rail, Surrey County Council and the Highways Agency, is required to drive an investment strategy over several years. Sticking plaster
solutions e.g. Network Rail’s proposed bridge works for the Farnham Road Bridge are a waste of funding and do little to address the town’s issues with the major bottleneck of the bridge continuing indefinitely. At Appendix 6 – is attached a report from Motion Consultants Ltd – ‘Guildford Gyratory, Highways Matters for Guildford Vision Group’ showing how a revision of the transport corridors in the town could provide major benefits, and much of the required resilience, for all forms of movement.

Attached documents:

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Comment: MM26 - LPMM18/4878  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

Appendix 3 -- Policy ID1: Infrastructure and Delivery

**Introduction**

4.6.1 The timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough's population, and of its economy. The Guildford borough Infrastructure Delivery Plan summarises the capacity and quality of existing infrastructure, including planned improvements. The non-site specific and more general infrastructure requirements are set out in the Planning Contributions Supplementary Planning Document 2017, which will be updated as required. Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality.

**Policy ID1: Infrastructure and Delivery**

(1) Infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts. To achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure. *Should be modified to include reference to Masterplanning in areas of the Borough* e.g. Strategic Sites and the Strategic Sites to Town Centre Links Study in that Masterplans will drive delivery plans with Infrastructure addressed.

(2) The delivery of necessary infrastructure will be secured by planning condition and/or planning obligation *And strategic integrated plans with key suppliers such as the Highways Agency, Network Rail, Surrey County Council and the ME LEP?? The Council needs to be active facilitator of developing and delivering solutions.*
(3) When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation.

(4) If appropriate, the imposition of Grampian conditions should be considered as a means to secure the provision of infrastructure when it is needed. If the timely provision of infrastructure necessary to support new development cannot be secured in line with this policy, planning permission will be refused.

(5) The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Delivery Plan. The Local Plan also includes land allocated for infrastructure.

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<th>Recommend an additional Policy</th>
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<tr>
<td><strong>Policy 6)</strong></td>
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<td>In addition to supporting the Department for Transport’s Road Investment Strategy the council will integrate this policy into plans for the road network managed by Surrey County Council, including the provision of resilient and safe transport corridors in the town centre. This policy will for the town centre support:</td>
</tr>
<tr>
<td>Ø Separation of modes of transport</td>
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<tr>
<td>Ø Better transport interchanges</td>
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<tr>
<td>Ø Improve resilience of the road network</td>
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<tr>
<td>Ø Reduce pollution, accidents and congestion</td>
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<td>Policy ID3 focuses on Sustainable transport for new developments many of its principles should be adopted for the Town Centre which will be a mix of new and existing developments</td>
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(5a) Where an applicant advises that their development is unviable with the policy and infrastructure requirements, the
Council will consider whether these costs were taken into account in the price paid for the site (or any agreement to purchase the site). If these costs were taken into account, as is required by the Council, but there are higher costs associated with the site that were unknown at this time, then the Council will take this factor into account when considering the viability and acceptability of the proposal.

(6) The non-site specific and more general infrastructure requirements are set out in the Planning Contributions Supplementary Planning Document 2011, which will be updated as required.

(7) Where appropriate, we will collect the Community Infrastructure Levy from developments in the borough. We will use Community Infrastructure Levy receipts towards providing infrastructure to support development, and will facilitate the spending of up to one quarter of Community Infrastructure Levy receipts originating from each parish and from Guildford town on local priorities to support development.

(8) In allocating developer infrastructure contributions, we will prioritise Thames Basin Heaths Special Protection Area mitigation and avoidance in order to ensure that we meet our legal responsibilities.

Definitions

4.6.2 Infrastructure is a very broad term. The Planning Act 2008 as amended defines infrastructure as roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces. Guidance on the CIL advises that infrastructure also includes cultural and sports facilities, district heating schemes, police infrastructure and other community safety facilities.

Reasoned Justification

4.6.3 The Infrastructure Schedule that supports this Plan focuses on the following types of infrastructure:
Strategic Road Network, Local Road Network, park and ride, Sustainable Movement Corridor, bus transport, active modes, and rail

Schools, utilities, including electricity and gas distribution and supply, water supply and waste water treatment, flood risk minimising

GPs and dental surgeries, hospital and community health care, libraries, cemeteries and sports facilities.

4.6.4 Maintenance of adequate infrastructure and expansion to meet growing needs is generally the responsibility of the relevant infrastructure provider. Most infrastructure providers work to statutory requirements and have set, short-term planning cycles and asset management plans. This is particularly the case with utility providers.

Masterplanning and identifying need ahead of being required allows providers to plan ahead and deliver more.

4.6.5 The Infrastructure Schedule sets out the key infrastructure needed, and the sources of funding, and is provided at Appendix C. This Schedule is also included in the Guildford borough Infrastructure Delivery Plan which supports the Local Plan. This provides more detail regarding future infrastructure needs, and will be regularly reviewed as further detail becomes available, particularly regarding infrastructure needed to support development later in the plan period. By allocating sites for new transport infrastructure, new primary and secondary schools, allotments, and a burial ground, we are facilitating the delivery of some of the infrastructure to support this Plan.

Amend first sentence to:

Through the planning system and its own major projects team, the Council is able to ensure that there is adequate infrastructure in place to support new development.

4.6.5a Through the planning system, the Council is able to ensure that there is adequate infrastructure in place to support new development. For instance, where applicable, developers will be required to demonstrate that there is adequate wastewater capacity and surface water drainage both on and off the site to serve the development, and that it would not lead to problems for existing or new users. Where there is an infrastructure capacity constraint, the Council will require the developer to set out what appropriate improvements are necessary and how they will be delivered and may use the planning system to ensure timely provision (e.g. through the imposition of Grampian-style conditions of appropriate phasing).
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| 4.6.6 | The law requires us to ensure that all planning obligations comply with three legal tests. These tests are that the planning obligation is:  
Ø necessary to make the development acceptable in planning terms,  
Ø directly related to the development, and  
Ø fairly and reasonably related in scale and kind to the development.  
These legal tests prevent us using planning obligations to fund existing infrastructure deficits, but they can be used where the proposed development would worsen the situation. |
| 4.6.6a | To ensure that the scale of development set out in the Local Plan can be delivered, we have considered the impact of the Plan policies and other requirements on the viability of development included in the Plan. On this basis, we require that these impacts and related costs are accounted for in the price paid for the site (or any agreement to purchase the site). Furthermore, in line with paragraph 57 of the NPPF, applicants will need to justify the need for a viability assessment at the application stage. Where an applicant advises that their development is unviable with the policy and infrastructure requirements, we will consider whether these were taken into account in the price paid for the site (or option on the site). If these had been taken into account, but there are higher costs associated with the site, we will consider negotiating. |
| 4.6.6b | In allocating developer infrastructure contributions, we will prioritise Thames Basin Heaths Special Protection Area mitigation and avoidance in order to ensure that we meet our legal duties. |
| 4.6.7 | We intend to introduce the Community Infrastructure Levy (CIL) to assist in funding infrastructure to support development. CIL must be spent on infrastructure needed to support development in the borough. With the exception of the "neighbourhood portion" of CIL which is passed on to the relevant parish councils, we will decide what infrastructure the CIL money is spent on. We may not use the CIL to remedy existing deficiencies in infrastructure provision unless those deficiencies would be worsened by new development. CIL funds can also be used to increase the capacity of existing infrastructure or to repair failing infrastructure. |

These obligations from the wording mean they apply to all landowners including the council?

How is scale defined number of units or does it include mass and height – the local plan is silent on mass and height?

This should be optional for the council to impose as in many cases it is illogical.
existing infrastructure, if that is necessary to support development.

(4.6.8 Paragraph intentionally blank)

(4.6.8 Paragraph intentionally blank)

4.6.10 We will allocate a "neighbourhood"

portion of our CIL funds to parish councils in accordance with national legislation.

Parishes and Neighbourhood Forums that have an adopted Neighbourhood Plan will be allocated a larger proportion to spend on their priorities to support development (although CIL receipts cannot be released to the latter).

4.6.11 Guildford Borough Council is required to retain the neighbourhood portion for the areas of the borough with no parish council, which in Guildford borough is the Guildford urban area and Wisley parish. A working group will be established to prioritise the neighbourhood CIL spending for those areas. This will include ward councillors, existing community groups and neighbourhood forums.

**Key Evidence**

- Draft Guildford borough Infrastructure Delivery Plan 2016 (Guildford Borough Council, 2016)
- Guildford borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment (Surrey County Council, 2016)
- Local Plan and CIL Viability Study (Guildford Borough Council, 2016)
- Local Plan Viability Update (Guildford Borough Council, 2017)
- The Community Infrastructure Levy Regulations 2010, as amended
Monitoring Indicators

Annual CIL Receipts

Annual CIL Spending

Attached documents:

Comment: MM27 - LPMM18/4875  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

MM27 - Policy ID2: Supporting the Department for Transport's Road Investment Strategy

During the hearing sessions there was in-depth scrutiny on the delivery of the improvements to the A3 and M25. The reasoned justification which accompanies policy ID2 sets out at paragraph 4.6.18a that the evidence provided at examination demonstrated that, without the implementation of the A3 scheme, the cumulative impacts of development in line with housing trajectory would become severe during the second half of the plan period. It is surely now the case with the revised housing trajectory putting more traffic on greenfield sites that the cumulative impacts would become severe far sooner in the plan period. It is noted that on several key criteria the traffic network is already at capacity.

Paragraph 4.6.18a then goes on to state that a review will be carried out to establish whether this severe impact can be mitigated, but if it cannot then a review of the Local Plan is likely to be required. This is almost certainly the case and it is therefore also patently the case that the plan is set to fail. This cannot be said to be positive planning in plan making terms. A logical step would be for the council to properly consider how the housing trajectory can be retained through the use of sites which would have a much lower impact on the A3 infrastructure, even though they are mostly council-owned sites. There is obvious merit in much stronger consideration of town centre sites where there is much greater access to sustainable transport options. Car ownership is likely to be lower, and is easier to control through development management tools. If holistic masterplanning is required by the council of the strategic sites then it applies equally to the council’s own sites.

Attached documents:

Comment: MM3 - LPMM18/4868  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

MM3 - Policy S3: Delivery of development and regeneration within Guildford Town Centre

The inclusion of policy S3 in response to the inspector's request at the hearing sessions is noted by GVG but does not achieve the objectives or aspirations of the Group and, more importantly, the residents of Guildford. And this is after previous plans failed to address issues or generate action through positive planning. The council consistently abrogates its responsibilities to masterplan the town centre to address local issues, even though it is the major land owner and the relevant authority, and could play a formative role in creating a vibrant Guildford.

In general terms there is a need for basic masterplanning. There is even a distinct lack of any map or plan which indicates which area policy S3 applies to. This should be included. It is vital that policy S3 is applied to a wider area than just the
area designated as Guildford Town Centre on the proposals map, and it should apply to the wider hinterland around the town centre where the more significant issues of urban decay exist, as highlighted by the Inspector during the hearing sessions. The GVG masterplan considers the much wider area around Woodbridge Meadows and Walnut Tree Close and this area should also fall under the remit of policy S3. Alternatively, the council should consider the inclusion of a policy S4 to cover the wider Guildford Urban Area as agreed within the joint GVG and Guildford Society submission made during the Planning Examination.

Paragraph 4.1.17 of the introductory text to policy S3 sets out how the delivery of aspirations of policy S3 will be delivered, including the future Area Action Plan (AAP). It remains abundantly clear to GVG that there is no obligation on the council to begin the AAP at any time in the future. This could be delayed indefinitely, as with the 2006 Town Centre Area Action Plan, whilst the town centre continues to fall into decline, including the supporting infrastructure. In order for the plan to be sound in terms of effectiveness it is crucial that there is a clear obligation on the council to begin the AAP immediately upon adoption of any plan, conditional upon other issues of soundness being resolved.

In document ID7 (Points raised during the Spatial Strategy session for response by the Council) the inspector raised a number of key points to the council in relation to the town centre as follows:

- For exceptional circumstances to exist to release land from the Green Belt, shouldn’t it be clearly demonstrated that all opportunities for development in the town centre have been exhausted?
- Isn’t the residential capacity of the town centre much higher than the Council states? How is it that the GBCS looked at potential residential development sites but such an approach does not appear to have been done for the town centre?
- Does the plan rely too much on additional retail in the town centre, limiting the opportunity to provide many more homes where both young and old people want to live? Isn’t the North Street redevelopment site within the Council’s gift to deliver homes early in the plan period?
- Should the plan pay more attention to improving the environment in the town centre?
- Should the spatial strategy pay greater attention to deprived parts of the urban areas?
- Shouldn’t the Council be emphasising the need for the University to intensify the use of its sites before new Green Belt land is taken? Areas of surface car parking could be developed.

It is considered that the council has simply not addressed the rest of the questions and GVG shares the concern of the inspector in this regard. Whilst the intention of policy S3 may be to address the town centre it does not address the connection with the fundamental questions, particularly around Exceptional Circumstances, which are considered to be a matter of soundness.

Paragraph 4.1.20 of the Reasoned Justification accompanying Policy S3 sets out that the Council will play a key coordinating aimed at achieving regeneration. It is disappointing to see that the council sees itself as only playing a coordinating role in the regeneration of the town centre and fails to recognise the unique role that the council can play as an owner of substantial land holdings across the town centre, and as the planning authority with the appropriate powers. An example of how councils can play a key role as land holder as well as facilitator of development is the Slough Urban Renewal initiative1 undertaken by Slough Borough Council.

Paragraph 4.1.20 goes on to set out the partners that the council will be working with to deliver policy S3 which include Surrey County Council, Network Rail, National Trust and the Private Sector. None of these parties will initiate and take forward solutions beyond their ownership. GBC, or a third party instructed by GBC, needs to take on this role.

It is notable that nowhere does the council's thinking include resident groups such as GVG, The Guildford Society, Guildford Bike User Group, Holy Trinity Amenity Group, or Guildford Residents Association. Nor does it include any obligation of the council to be the facilitator or to work with the residents of the borough. These are matters which are fundamental to the success of policy S3. Historically the council has a history of consulting residents but not engaging to develop plans acceptable to residents.

footnote: 1 https://www.slough-thinkingforward.co.uk/

Attached documents:
Introduction                          | GVG Comment                         
---                                 |---                                  
4.1.12 Guildford town centre has a unique setting and historic character and is the largest retail, service, administrative and commercial centre in the county of Surrey (measured by floorspace and number of units). With good transport accessibility by rail and road, it is one of the key town centres in the South East outside of London. | Accepted |

4.1.13 The town centre is centred on two linear features, the River Wey, and the High Street that rises up the valley side from Town Bridge. Related to this, the centre has striking topography, with attractive views to the surrounding countryside south and east of the town centre. It is renowned for its picturesque historic High Street and lanes off it, known as ‘gates’ which link the High Street, the Castle and the other key shopping street, North Street. The setting and the historic street pattern in the central area of the town centre are a vital part of its special character as is the range and concentration of heritage assets. | The Town Centre has large areas of deterioration and obvious opportunities for a town centre plan with an integrated approach to the serious issues identified in the plan at examination. |

4.1.14 The NPPF states that policies should recognise that residential development often plays an important role in ensuring the vitality of centres and therefore should encourage residential development on appropriate sites. The Council is committed to ensuring that the policies and allocations within the Local Plan, including those within the Guildford Town Centre, are deliverable and its objectives are realised over the plan period. Furthermore, the Council remains committed to supporting any further opportunities for future development and regeneration within the town centre that reinforces its important role and function. The Guildford Town Centre is intended to function as the key focus for a more intense vibrant mix of uses including residential, office, retail, leisure, tourism, entertainment, and arts and cultural facilities. | The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan. The council as the principal landowner in the Town Centre has a KEY role in regenerating the town centre – it is not just support |

4.1.15 The Council is facilitating the delivery of development through a range of proactive measures. These include: | Why if the Policy is linked to the Town Regeneration Study have other important sites been left out and not covered by policies (See Page 68 - Regeneration Work Programme – Guildford Town Centre |

Ø Driving and unlocking key development projects that form a basis for the delivery of the Local Plan (such as at North Street,
Ø Playing a lead role, working with other delivery partners, in infrastructure interventions that realise growth and regeneration opportunities;

Ø Advancing and collaborating on key regeneration opportunities as part of the Guildford Town Centre Regeneration Strategy, which include leveraging its own landholdings as part of efforts to promote mixed use and higher density development supporting the vitality and vibrancy of the town centre.

4.1.16 In undertaking and further to these actions, the Council will explore the use of a range of mechanisms at its disposal to support regeneration and the accelerated development of housing and mixed-use schemes. These include using, where appropriate, compulsory purchase powers, granting permission in principle, assisting in land assembly and playing a coordinating role with its development partners around development opportunities.

4.1.17 The borough’s town centre will form the key focus for these measures to support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with careful attention to the Local Plan’s design policies, Development Management policies, the provisions of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development.

POLICY S3: Delivery of development and regeneration within Guildford Town Centre

Regeneration Strategy 2017 – attached at Appendix 4)?

The absence of a town centre masterplan including the council’s own extensive land holdings would mean the policy is weaker than it could be

What is council going to do to bring forward sites identified in the Town Centre Regeneration Strategy 2017?

This paragraph should be reworded to state that the council will play a ‘leading role’ rather than the ‘coordinating role’ as set out.

Surely with its landholdings the council can take a more proactive role – not just explore - in delivering this policy.

Careful attention is not a commitment and masterplanning must be an essential first step.

Suggest replace text by:

The borough’s town centre will form the key focus for these measures to support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with the development of a comprehensive Masterplan for the Town centre which will pay careful attention to the Local Plan’s design policies, Development Management policies, and form the basis for the provisions of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development.
**Coordination of development in the Town Centre**

(1) Development proposals will be encouraged to seek opportunities to enable the future development potential of adjacent sites and not undermine their development potential.  
*There can be no co-ordination without masterplanning to secure the broad range of plan objectives including addressing flooding, power, water and movement corridors.*

**More efficient use of land and the acceleration of housing delivery**

(2) Major applications will be expected to deliver a mix of uses and include residential development. Residential development in mixed use schemes will be expected to meet identified housing need.  
*There must be a spatial strategy for the town centre – not all buildings are mixed use. In particular location of commercial activity and housing needs to be identified to optimise transport and create mixed use neighbourhoods.*

(3) Schemes must demonstrate that they have made the most efficient use of land both in terms of the quantum of development and the mix of uses.  
*Again there needs to be a Masterplan of allocation as development will occur over a 10plus year timescale*

(4) In seeking to achieve more efficient use of land and/or accelerated housing delivery and/or regeneration, the Council will where appropriate utilise mechanisms such as its compulsory purchase powers.  
*Besides using CPO powers, where appropriate GBC will lead or promote development initiatives to deliver an adopted masterplan. The council may also need to consider alternative management structures to deliver the Town Centre e.g. Development Corporations*

**Place shaping and character and design of new development**

(5) New development will have regard to:  
*a* the provisions of Policy D1;  
b) the historic environment, street pattern and topography;  
c) important views into and out of the town centre from the surrounding landscape;  
d) views within the town centre of important historic buildings and local landmarks.  
*See notes on D1 Below. The Town Centre in totality should be considered a Strategic Site and thus subject to a proper Masterplan process as proposed in Policy D1 --- ‘regard to’ what does this mean in practice*
(6) Schemes must demonstrate high quality urban design and contribute wherever possible to achieving:

a) mixed use developments with active ground floor uses;

b) defined public and private spaces which are well-enclosed;

c) an attractive and safe public realm;

d) legible routes that are easy to understand and to move through, and give priority to pedestrians and cyclists over motor vehicles;

e) improved access and views to the River Wey

<table>
<thead>
<tr>
<th>Upgrade Town Centre Infrastructure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Needs a policy related to Policy ID1</td>
</tr>
<tr>
<td>Due to the identified infrastructure deficit and record congestion a radical solution is required to sustain the town centre.</td>
</tr>
<tr>
<td>This is the second most important issue critical to enabling Homes and Commercial sites to be developed.</td>
</tr>
<tr>
<td>The GVG crossing is but one option (currently the only one) and Motion Consultants Ltd Report - Guildford Gyratory, Highways Matters for Guildford Vision Group shows increased resilience and environmental improvements as well as health and safety wins with the crossing and is attached.</td>
</tr>
</tbody>
</table>

**Reasoned justification**

4.1.18 Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its “Place Making” theme. Key projects to support this and the delivery of the Local Plan include:

<table>
<thead>
<tr>
<th>(a) Facilitating the delivery of a major new mixed use development in North Street</th>
</tr>
</thead>
<tbody>
<tr>
<td>Note on a)</td>
</tr>
<tr>
<td>(b) Implementing the vision of the Town Centre Regeneration Strategy</td>
</tr>
<tr>
<td>(c) Improving the public realm, including surfaces, in key town centre areas</td>
</tr>
</tbody>
</table>

| 4.1.19 This policy and the Town Centre Regeneration Strategy will help deliver the following objectives: | General point this policy needs to be cross-referenced to actual substantive statements/policies on Mass Scale and Sightlines for the towncentre. |
| (a) enhance the vibrancy of Guildford Town Centre | Note on c) How do you do this with Bedford Wharf and Portsmouth Road Car Parks and the Area around the courts which are awaiting regeneration? |
| (b) create and foster high quality design | Note on d) How is this to be done pending a proper policy? |
| (c) protect the town’s heritage and overall feel | Note on g) Good in principle but how is the council proposing to manage this with THROUGH traffic in Guildford still being a significant volume – doesn’t this |
| (d) respect existing townscape at both the street and roof level | |
| (e) create an enhanced and more positive public realm | |
| (f) reduce the concrete environment atmosphere | |
| (g) realise the Council’s ‘drive to, not through’ concept to reduce the impact of traffic in the town centre, complementing future environmental improvements | |
| (h) link the Town Centre to the train station | |
| (i) open up the River Wey and improve connections to the river | |
| (j) assist in meeting Guildford’s housing demand | impact other routes around the town |
| (k) ensure schemes are sustainable and do not lock future development potential | e.g. rat running through Compton. |
| (l) promote and create an investment friendly environment | The whole transport policy in the Plan and in 2014 Town Centre Master Plan and Guildford Town Centre Regeneration Strategy 2017 is just words with no substantive proposals |

Note on h) Not clear how this is to be achieved |

Note on i) This should be far stronger with the presumption for a Wey pedestrian cycle corridor on both banks i.e. new developments should leave 20 ft margin from river etc.
Note on k)
The council need to accept responsibility for professionally masterplanning the town centre and assist developers in others to deliver the plan.

Note on l)
What does this mean in practice does there need to be a spatial strategy that
e.g. puts offices on or near transport hubs etc.
ADD a new para m) promote and create a resident friendly environment.

<table>
<thead>
<tr>
<th>4.1.20 Whilst the Council will play a key coordinating role aimed at achieving delivery of development and regeneration, working with partners such as Surrey County Council, Network Rail and the National Trust, the private sector is central to this process. It is important that schemes that seek planning permission are conceived and designed in a manner that considers regeneration opportunities beyond the boundaries of the site. Collaboration</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1.21 The delivery of housing in the town centre adds to its vitality and vibrancy. The Council regards the town centre as critical in terms of meeting needs for main town centre uses. This includes high trip generating uses such as offices and retail, where there are opportunities to encourage linked trips and maximise the use of public transport networks. However, the town centre also represents the most sustainable location for new higher density housing. Whilst the Local Plan provides for sufficient sites to meet housing needs over the plan period, as part of regeneration efforts, more housing is likely to come forward over the plan period. It is important that this occurs in a manner that makes the most of its central location and is thus developed at a density that maximises its sustainability benefits whilst responding to heritage, design and flooding considerations.</td>
</tr>
<tr>
<td>In the natural absence of pressure to regenerate from the private sector (most of the land is council owned) the Council must take a leading role in putting in place a professional masterplan. Partners such as SCC, Network Rail and the National Trust will only work on their own sites. National Trust is unlikely to be considered as a partner in any regeneration and will only be an important statutory consultee. The council appear to be seeking to pass the obligations to deliver masterplan objectives without having a masterplan.</td>
</tr>
<tr>
<td>Where are substantive policies to achieve this? Agreed, and if followed up with energy could save unnecessary use of the Green Belt. Needs a masterplan of Infrastructure and Facility improvement to achieve this? It is important that all these elements are delivered through a co-ordinated masterplan led by the council</td>
</tr>
</tbody>
</table>
Consideration should also be given to the potential to minimise the provision of car parking where this can help optimise the density of development.

4.1.22 The Council will support mixed use development, which can retain or re-provide retail, leisure and employment uses/floorspace in the town centre, in line with national and Local Plan policies. This will help ensure the efficient use of land and presents an opportunity to enhance the vitality of the town centre and increase delivery of homes in sustainable locations.

The policy should highlight the need for buildings to be designed with flexibility of use in mind e.g. Student Dwellings don’t convert easily into Owner occupied Flats – unless this is recognised in the design from day one.

4.1.23 Enhancing the vitality and vibrancy of the town centre cannot occur solely though more intense uses, nor greater numbers of residents.

The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.

A quality public realm needs to support day-to-day activities, peoples’ well-being, safety and sense of place and forms the basis for the area’s attractiveness to residents, workers and visitors.

4.1.24 The public realm includes publicly-owned streets, squares, pathways, parks, publicly accessible open spaces, right of ways, and any public or private building and facilities that are accessible by all. Whilst parts of the town centre reflect high quality public environments, there are areas where this could be improved. This is often in areas

These will all need to be created within the new areas of regeneration. It is key role for the council to ensure all developers take this policy seriously.

4.1.25 The enhancement of the public realm and its amenity value will ensure the town centre becomes an even more attractive place to live, work and visit and will be a key component of the area’s regeneration. This could occur through a range of interventions such as improving surfacing of public space, providing more generous pedestrian environments, landscaping, street furniture, lighting and public art. The Council will seek contributions toward the improvement of the public realm from developments, where appropriate. The Council will also continue working with Surrey County Council to implement measures that deliver public realm enhancements.

The first intervention must be a masterplan to set the framework with adequate community involvement.

Missing Policy?

What about Public Social Infrastructure Health, Entertainment, Education and Leisure facilities?
Key Evidence

The Guildford Town Centre Regeneration Strategy (Guildford Borough Council, 2017)

And also 2014 Town Centre Master Plan – which in itself is a rewrite/update on the Allies and Morrison proposals? Both have not been adopted by GBC.

Monitoring Indicators

The number of new homes completed each year in the town centre

Surely there should be indicators related to increase in Accidents, Pollution, Pedestrianised Space, Bike Lanes Provided, Traffic Congestion etc.

Attached documents:

Comment: MM3 - LPMM18/4881  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

Appendix 4 - Exports from Guildford Town Centre Regeneration Strategy 2017 (January 2017)

see appendix for attached

Attached documents: GVG REP APPENDIX 4.pdf (484 KB)

Comment: MM3 - LPMM18/4883  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

Appendix 5 - Statement of Common Ground

see attached for appendix

Attached documents: GVG REP COMMON GROUND.pdf (400 KB)

Comment: Other comments - LPMM18/4887  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

Appendix 1 (SOCG) Letter from GBC (Paul Sherman) re FOI

see attached for appendix

Attached documents: GVG REP FOI.pdf (570 KB)
Comment: Other comments - LPMM18/4890  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

Appendix 2 (SOCG) -

see attached for appendix

Attached documents: [GVG REP SOCG.pdf](#) (277 KB)

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Comment: Other comments - LPMM18/4891  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

Appendix 6 – Motion Consultants - Guildford Gyratory Highways Matters for Guildford Vision Group

see attached for appendix

Attached documents: [GVG REP HIGHWAY MATTERS.pdf](#) (1.3 MB)

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Comment: Other comments - LPMM18/6242  Respondent: Guildford Vision Group (John Rigg) 9531041  Agent:

Conclusion

GVG has other concerns related to the plan, e.g. Policy D2 appears to have been substantially weakened in its protection of heritage assets but GVG has focused in this note on the key issue of Policy S3 and interlinked supporting policies.

GVG believe the plan as it is proposed is unsound as it:

- Has weak and inadequate policies for the town centre, which requires a masterplanned approach for the entire area
- In the absence of a proper plan for the town centre housing, utilises precious greenbelt space
- Doesn’t address a wide range of Infrastructure issues
- Doesn’t safeguard key sites for Infrastructure improvement in the town centre

Finally, GVG, as always, remains ready to engage positively with other parties to create the plan that Guildford so desperately needs, and that the South East economy requires for Guildford to play its rightful role.

To remain productive and helpful to the council, GVG has prepared comments/proposed rewording in detail on Policies

Appendix 1 – Policy S3
Appendix 2 – Policy D1
Appendix 3 – Policy ID1

Also included as referenced in the text above

Appendix 4 – Extracts Guildford Town Centre Regeneration Strategy 2017 Jan 2017
Appendix 5 - Statement of Common Ground May 2018
Appendix 6 – Report from Motion Consultants Ltd - Guildford Gyratory, Highways Matters for Guildford Vision Group

Attached documents:
Comment: MM2 - LPMM18/2433  Respondent: Anne Pascoe  9607905  Agent:

I am writing to object strongly to the excessive development planned for the Send/Ripley area and also the planned access to the A.3. in West Clandon. This will cause undue problems to the A.247 which is already coping with excessive traffic, especially heavy goods vehicles. It is wrong to build on Green Belt land when there is plenty of brown field sites available which should be used first. The increased traffic caused by so many new houses will result in grid lock for the whole area. I implore you, DO NOT BUILD SO MANY HOUSES

Attached documents:

Comment: MM45 - LPMM18/4560  Respondent: Keith Witham  10260769  Agent:

I OBJECT to this Proposal and ask GBC to remove site A64 from the revised draft plan.

My main concern is the effect of this proposed development site for 105 new homes are the effects on traffic, road safety and congestion. Glaziers Lane is a “D” road and over 100 new homes would add at least 150 cars onto the local roads daily.

The ‘exceptional circumstances’ that are needed to redraw the Green Belt boundary in Normandy have not been shown.

GBC should further review the overall housing number in the Local Plan as the current number may be exaggerated, failing to take into account the latest housing projections from the Office of National Statistics, which suggest the numbers in the Plan are overstated by 45%.

The lack of a convincing justification for site A64 in particular suggests that it was inserted just to respond to the Inspector’s challenge, taking no account of the circumstances of its location.

A large part of site A64 is a fishing lake and it is not even clear that all of it is even available for development.

The road and sewerage systems in Normandy are already stretched and 7% more houses – all to be built over a three-year period - will create a significant additional burden.

Although included as a ‘Main Modification’ to the Local Plan no accompanying improvements to infrastructure are suggested. There are no existing facilities in Flexford and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality. This site only places long term strain on the community without conferring any community benefit.

I believe that Normandy residents have shown in their responses to previous Local Plan consultations that they clearly want to preserve the rural nature of the Normandy /Flexford community.

Attached documents:

Comment: MM2 - LPMM18/5586  Respondent: F McHugh  10299041  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

Please note my comments set out below:
1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North-facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway).
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph.
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park.
5. The narrowness of the road near Summers.
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement.
7. The sharp bend near Clandon Regis.
8. The narrowness of the road at the Bull’s Head.
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school.
10. The sharp bend with poor sight lines in either direction at the church.
11. No continuous footpath through the length of the village.
12. The speed of traffic.
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

**MM2** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

**MM2** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

**MM2** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure e.g. excessive student homes in town, low economic participation.

**MM2** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

**MM2** Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/5589  **Respondent:** F McHugh 10299041  **Agent:**

**MM23** In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

**MM23** (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

**MM23** Promotion of “**green approaches**” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

**MM23** If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

**MM23** should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**MM23** – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.
The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/5587  Respondent: F McHugh 10299041  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5590  Respondent: F McHugh 10299041  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5591  Respondent: F McHugh 10299041  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

---

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

---

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

---

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**
Comment: MM13 - LPMM18/3706 Respondent: Ian Wilkinson 10326081 Agent:

MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/3704 Respondent: Ian Wilkinson 10326081 Agent:

I understand that a main modification may only be made if the plan as submitted is unsound. Realistically, modifications should only be required to make it sound.

MM2 Spatial development strategy and housing numbers
This is fundamental to the whole plan, and sufficiently important that I consider the housing requirements render the whole plan unsound.

The housing requirement should be calculated from the starting point of the latest, September 2018, ONS projections rather than the projections released earlier in 2018. These indicate a projected population increase of 301 dwellings per annum. Given the environmental constraints in this area, I consider that the OAN target should therefore, in our opinion, be set at a figure in the region of 301 dwellings per annum, ie the same as the ONS perception of need, and this totals 5728 over the plan period.

As set out in MM2:

Commitments (permissions/completions) total 3675 LAA sites not allocated total 620
Windfall sites total 750

This aggregates to a total of commitments, LAA sites and windfalls of 5045.

Assuming that the target is set at (say) 6000 (rounding up to the nearest thousand), I consider that the uplift of 955 can be met within the urban area on existing brownfield sites.

This reduces the case for Green Belt releases. No exceptional circumstances have been demonstrated to support release of any of the Green Belt (or indeed countryside) sites, especially since (per new policy S3) it is clear that the brownfield land within the urban area should be used as a matter of priority.

I cannot see that these numbers demonstrate any form of justification for the release of any new Green Belt or rural sites.

I note that the Inspector has sought the Council’s views on those ONS figures (ID/10), but given their significance ought to be asking the examination participants more generally for their views.

I also consider the retail requirements are unrealistically high, in particular for comparison shopping. More urban land is therefore available for housing development. The housing numbers proposed for the town centre of 863 are considerably below what the town centre is able to accommodate. By increasing pressure on the Green Belt the plan is unsound as not being consistent with national policy. The Town Centre housing figures should be increased to a minimum of 955 (assuming that the total target of 6000 is accepted) and policies put in place to manage that growth.

Attached documents:

Comment: MM23 - LPMM18/3708 Respondent: Ian Wilkinson 10326081 Agent:
MM23 (Policy D1) dilutes the requirement for the social dimension of sustainability, thus making it easier for developers to exploit.

Strategic sites are to be exempt from design constraints

There is no evidence that recent case law such as “People over Wind” has been taken into account

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM3 - LPMM18/3709</th>
<th>Respondent: Ian Wilkinson 10326081</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>S3 The town centre policy is inadequate and does not address the infrastructure deficit.</td>
<td></td>
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</tr>
</tbody>
</table>

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM40 - LPMM18/3710</th>
<th>Respondent: Ian Wilkinson 10326081</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITE SPECIFIC – A35 – Three Farms Meadows</td>
<td></td>
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</tbody>
</table>

The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR

Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM40 - LPMM18/3712</th>
<th>Respondent: Ian Wilkinson 10326081</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>[This comment is assumed to relate to policy A35 - Former Wisley Airfield]</td>
<td></td>
<td></td>
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</tbody>
</table>

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/3707</th>
<th>Respondent: Ian Wilkinson 10326081</th>
<th>Agent:</th>
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783 of 2554
MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme, for example, Site A35 – TFM; MM41 site A43–Garlicks Arch; MM44 – Aldertons Farm.

There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

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**Comment:** MM50 - LPMM18/3711 **Respondent:** Ian Wilkinson 10326081  **Agent:**

MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.

**Attached documents:**

---

**Comment:** MM9 - LPMM18/3705 **Respondent:** Ian Wilkinson 10326081  **Agent:**

MM9 – infilling in and around villages will result in the weakening of protection of the countryside

**Attached documents:**

---

**Comment:** MM13 - LPMM18/3185 **Respondent:** Adrienne Lawrence 10337569  **Agent:**

MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

**Attached documents:**

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**Comment:** MM2 - LPMM18/3183 **Respondent:** Adrienne Lawrence 10337569  **Agent:**

I have just returned from holiday so no time to create my own objection but I want it on record that I strenuously object to the plan.. my reasons outlined below

- MM2 The housing target is wrong. **Call for the hearing to be reopened so that the latest ONS figures and household projections can be taken into account**
- MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
- The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of
another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

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**Comment:** MM23 - LPMM18/3187  **Respondent:** Adrienne Lawrence 10337569  **Agent:**

MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – *(this makes it easier for developers)*

- Strategic sites are to be exempt from design constraints *(which will result in developments such as that proposed on Three Farm Meadows)*
- There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

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**Comment:** MM3 - LPMM18/3188  **Respondent:** Adrienne Lawrence 10337569  **Agent:**

S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

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**Comment:** MM40 - LPMM18/3189  **Respondent:** Adrienne Lawrence 10337569  **Agent:**

SITE SPECIFIC – A35 – Three Farms Meadows

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR *(the air traffic control beacon which prevents construction within a certain radius)*
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
- MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

Attached documents:

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**Comment:** MM41 - LPMM18/3186  **Respondent:** Adrienne Lawrence 10337569  **Agent:**
MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].

- There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

**Comment:** MM9 - LPMM18/3184  **Respondent:** Adrienne Lawrence 10337569  **Agent:**

MM9 – infilling in and around villages will result in the weakening of protection of the countryside.

**Attached documents:**

**Comment:** MM2 - LPMM18/1560  **Respondent:** Ms Kate Lipmann 10408353  **Agent:**

I understand yet again the local community need to write to again OBJECT to the plans that have been put forward for the development of greenbelt land on the Wisley Airfield.

MM2

I believe the examination in public to be re-opened so that the latest Office of National Statistics can be used. There also should be no requirement for Guildford to take Woking’s unmet need particularly as this would require further greenbelt release! The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

**Attached documents:**

**Comment:** MM41 - LPMM18/1563  **Respondent:** Ms Kate Lipmann 10408353  **Agent:**

MM41

Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm]. There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**
I would like to register my objections to the current planning for additional developments around Send Village.

In particular I would like to object to the developments MM44 and MM41.

As well as impacting on the heritage of the area around Send Marsh Green, MM44 also contradicts the Green Belt policy of MM9. This land has always been listed as green belt land and therefore other non-green belt sites should be considered before developing this green belt land. In addition, the whole area around Send is at full capacity for what the current infrastructure can support, this includes:-

- Roads
- Schools
- Doctors
- Dentists

Send Villages Medical Practice is full, takes many days if not weeks to get a Doctor's appointment. Ripley has now lost is local primary school and only has one small dentist practice. The roads around this area are heavily congested at all times and safety is becoming an issue as more and more major accidents are happening on the A3 section parallel to the Send/Ripley area as well as parking being pretty non existent during peak times. With no local schools being able to take a large influx of new residents, this would result in yet more traffic as new residents would have to drive their children to distant schools outside of the local area.

Therefore, without substantial additional infrastructure to support the above, this area cannot support any more additional housing as shown in MM44 and MM41.

Attached documents:
Therefore, without substantial additional infrastructure to support the above, this area cannot support any more additional housing as shown in MM44 and MM41.

**Attached documents:**

**Comment: MM2 - LPMM18/3502  **Respondent: Rosslyn Reeves 10443169  **Agent:**

We have read that the Office of National Statistics has indicated that the number of houses Guildford Borough Council are proposing is flawed and an overestimate. Will this be taken into account. I would like to think that our Council (voted for by majority of residents) would be on their side, and not give in at the first fence to an uninformed Government Inspector.

How many objection letters do residents have to write to make Guildford Borough Council and the Inspectors understand the genuine concerns everyone has??

**Attached documents:**

**Comment: MM41 - LPMM18/3500  **Respondent: Rosslyn Reeves 10443169  **Agent:**

I am writing to protest most strongly to the latest Draft Guildford Local Plan which has substantially increased Green Belt Development in Send and Send Marsh. I would like my comments to be seen by the Planning Inspector.

The recent Planning Inspectors report on the Guildford Local Plan was worrying as it suggests even more development in Send and Send Marsh than the previous Plan.

The new housing plan calls for increases to the Garlicks Arch (MM41) area Policy A43 from 400 to 550 homes and the reintroduction of 120 homes to Aldertons Farm, Send Marsh (MM44) Policy A63. This latter plan was withdrawn from an earlier plan for very good reasons. With development planned for Clockbarn (60) and Winds Ridge (40), it adds 770 houses to the 1700 currently in Send and Send Marsh, increasing it by 45%. More importantly the Garlicks Arch (MM41) and Aldertons Farm (MM44) sites are at either end of Send Marsh, which is taking an unrealistic hit of development which is scheduled for the first five years of the plan on Green Belt Land! This is not sustainable and will put pressure on an already stressed infrastructure.

In addition, the land at Burnt Common Policy A58 has been increased from 7000 sq metres of Industrial Development and Storage to a minimum of 14800 sq metres. Why is this taking place when land at Slyfield is available for further development of industrial development?

Land at Aldertons Farm (MM44) is Green Belt land with no special circumstances so it contradicts Policy MM9. These fields, now paddocks for grazing horses, act as natural drainage resulting in flooding in the lower field during the winter. Send Marsh is a marshland and concreting over it will exacerbate the problem. There is also wildlife flourishing on these fields e.g. deer.

There are already streams occurring in Tuckey Grove from the fields following heavy rainfall and building 120 houses will result in further water issues.

The traffic at Send Cross Roads will increase and already the roads are heavily congested at peak times. The Medical Surgery is already oversubscribed, and the local school has had to take more intake following the closure of Ripley First School.
With regard to the proposal of 550 homes being built on Garlicks Arch (MM41), there have already been 7000 objections to this which seems to have been ignored. This area is Green Belt containing ancient woodland.

**Attached documents:**

---

**Comment:** MM44 - LPMM18/3501  **Respondent:** Rosslyn Reeves 10443169  **Agent:**

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**Attached documents:**

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**Comment:** MM27 - LPMM18/4000  **Respondent:** Shelagh Smith 10540161  **Agent:**

**MM27, MM41, MM42, MM48 Transport Strategy**

I strongly object to even more traffic resulting from your intentions in the plan modifications. As above, the increased pollution and the resulting gridlocked roads in the immediate area are already evident. The A3 and local A
Roads are already at breaking point and this has a continuous overflow impact on surrounding village and the nearby narrow B roads. Your assessment for your proposed transport strategy is unrealistic and inadequate.

**Attached documents:**

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**Comment: MM41 - LPMM18/396**  **Respondent:** Shelagh Smith 10540161  **Agent:**

I strongly object to the main modifications as listed below. I also want to point out that it is incredulous that you have ignored the previous 7000 legitimate objections to your plan involving Send, Send Marsh, Burnt Common and Garlick’s Arch.

**MM41 Land at Garlick’s Arch, Send Marsh, Policy A43**

I strongly object to the increase from 400 to 550 homes. This proposal refuses to acknowledge the negative impact on the environment – specifically the noise and pollution from the loss of the Ancient Woodland which creates the natural barrier from the A3. Send Marsh sits in topography which is low lying and therefore the air will be even more affected from traffic pollution with the loss of the woodland at Garlick’s Arch. The Ancient Woodland is irreplaceable; ‘Ancient Woodland’ carries a higher level of protection in the planning system (ref Para 118 of the National Planning Policy Framework) which you need to adhere to. Surely, there is a need to preserve this irreplaceable wood and habitat in a similar way that we have Preservation Orders on the Oak trees in Oaks Way?

**Attached documents:**

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**Comment: MM41 - LPMM18/401**  **Respondent:** Shelagh Smith 10540161  **Agent:**

**MM27, MM41, MM42, MM48 Transport Strategy**

I strongly object to even more traffic resulting from your intentions in the plan modifications. As above, the increased pollution and the resulting gridlocked roads in the immediate area are already evident. The A3 and local A Roads are already at breaking point and this has a continuous overflow impact on surrounding village and the nearby narrow B roads. Your assessment for your proposed transport strategy is unrealistic and inadequate.

**Attached documents:**

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**Comment: MM42 - LPMM18/397**  **Respondent:** Shelagh Smith 10540161  **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

I strongly object to the increase from 7000 to a minimum of 14,800 sq m of industrial and storage.

This takes Green Belt land and is at odds with your **Green Belt Policy** – MM9. There simply isn’t the infrastructure to accommodate the increased and heavy traffic load; e.g. potholes continually form, frequent traffic jams are now the norm in the area and parking at facilities such as at the Villages Surgery, the Shell/Waitrose Garage, and Send and Ripley village centres is impossible at certain and frequent times. In addition, there is capacity for further industrial and storage use at Slyfield.
**MM27, MM41, MM42, MM48 Transport Strategy**

I strongly object to even more traffic resulting from your intentions in the plan modifications. As above, the increased pollution and the resulting gridlocked roads in the immediate area are already evident. The A3 and local A Roads are already at breaking point and this has a continuous overflow impact on surrounding village and the nearby narrow B roads. Your assessment for your proposed transport strategy is unrealistic and inadequate.

**Comment: MM44 - LPMM18/398  Respondent: Shelagh Smith 10540161  Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

I strongly object to the use of the land at Alderton’s Farm for 120 homes. This is Green Belt land and I frequently use the public footpaths here. The wildlife is incredible, e.g. the deer that can be seen at twilight in and out of the woodland areas at this site. **MM44 opposes MM9 Green Belt Policy.** The new development will completely transform the tranquillity of the Send Marsh settlement.

**Comment: MM48 - LPMM18/403  Respondent: Shelagh Smith 10540161  Agent:**

**MM27, MM41, MM42, MM48 Transport Strategy**

I strongly object to even more traffic resulting from your intentions in the plan modifications. As above, the increased pollution and the resulting gridlocked roads in the immediate area are already evident. The A3 and local A Roads are already at breaking point and this has a continuous overflow impact on surrounding village and the nearby narrow B roads. Your assessment for your proposed transport strategy is unrealistic and inadequate.

Overall, your proposals constitute an unrealistic and negative impact on the area of Send, Send Marsh, Burnt Common and Ripley. Without the Green Belt and Ancient Woodland to protect the area, we may just as well live in the centre of a major conurbation. Please do not destroy our communities.

**Comment: MM9 - LPMM18/399  Respondent: Shelagh Smith 10540161  Agent:**
MM9 Green Belt Policy

I strongly object to the contradictions in the modifications to the local plan which directly take land from the Green Belt.

Attached documents:

**Comment: MM2 - LPMM18/2940  Respondent: Sarah Wright 10543937  Agent:**

I wish to make comment on Policy S2

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year.

After this Barton Willmore, Consultancy, has found that the correct figure should be 431. Following on from this, September data from the Office for National Statistics, which carries out population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year.

It seems that the Local Plan is inaccurate.

Conclusion:

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites. GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

Please explain why thousands of previous objections are ‘not relevant’ this time round? How difficult can it be for GBC to listen to the people who know the area best - the residents? The whole process of this Local Plan has been a farce. I suggest GBC take note of local residents concerns and objections before the implications are borne out at the next council election.

I am not completely against development, but I oppose development without thought and consideration for the basics, and which will be detrimental for the area.

Attached documents:

**Comment: MM27 - LPMM18/2936  Respondent: Sarah Wright 10543937  Agent:**

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:
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<tbody>
<tr>
<td>Please see my comments below regarding the 2018 modifications to the Local Plan. I wish my comments to be seen by the Planning Inspector I object to the following specific modifications to the Local Plan:</td>
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<tr>
<td><strong>Policy A43, Land at Garlicks Arch, Send Marsh (Modification MM41)</strong></td>
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<td><strong>I object to modifications MM41 Land at Garlicks Arch due to the following points.</strong></td>
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<td>An increase of 37% in housing numbers is excessive and will result in urban sprawl and the neighbouring villages merging into one another. It constitutes over development. These further additions to the housing numbers are not required.</td>
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<td>It is an unsustainable location. It will undoubtedly cause traffic chaos on the minor surrounding roads. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, anyone who lives in these areas will confirm that this is the case. Substantially more vehicle movements will result in even more congestion and greater pollution. Residents and the environment will suffer as a result.</td>
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<td>This green belt land contains ancient woodland dating back to the 16th century, which should be preserved. There is no good reason to tamper with it with additional housing numbers.</td>
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<td>An extra 150 houses means easily an extra 300 cars on the local roads, which cannot be accommodated.</td>
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<td>This site is identified as being in a Flood Zone 2 and regularly floods during winter months.</td>
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<td>This site contains land which is heavily contaminated by many years of shooting with lead shot.</td>
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<td>The local school and medical facilities won’t be able to accommodate extra housing. It is already at maximum capacity (not helped by the feeble decision to close Ripley school).</td>
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<td>Above all, the latest changes to this site have completely ignored the thousands of previous comments from residents (who know the area best of all) during the previous consultations.</td>
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Policy A58 Land at BurntCommon (Modification MM42)

I object to modifications MM42 Land at Burnt Common due to the following points:

There is no requirement for new (and certainly not increased) industrial or warehouse space as there is ample availability at Slyfield and Guildford Industrial estates, developing in this way is pure stupidity and is just building for the sake of it.

Additionally, this site is in the Green Belt, there are no exceptional circumstances to justify development here.

This proposal completely contradicts the statement MM9 makes.

According to the latest Employment Land Needs Assessment there is a reduction in demand for industrial land in the whole borough. Everywhere you look around the borough there are empty industrial buildings! Again…pure stupidity.

Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

Any extra traffic would cause traffic chaos in the local area with its small roads, adding commercial vehicles to this would be completely unsustainable.

After this site was deleted from the 2014 Local Plan due to massive objections, it has now been re introduced and doubled in size, farcical, especially on top of a 25% increase in size of Send Business Centre. This results in an excessive concentration in this village than any other in the borough. And there’s no requirement for it!

Attached documents:

Comment: MM42 - LPMM18/2938  Respondent: Sarah Wright 10543937  Agent:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

Comment: MM44 - LPMM18/2934  Respondent: Sarah Wright 10543937  Agent:

Policy A63 Land at Aldertons Farm, Send Marsh Road (Modification MM44)

I object to modifications MM44 Land at Aldertons due to the following points:

This site is in the Green Belt, there are no exceptional circumstances to justify development here so it contradicts Policy MM9.

This site is located close to listed historic buildings at Send Marsh Green and any development here would be too modern, and without a doubt designed so badly that it would ruin the rural character of the whole area. I cannot think of a modern development that doesn’t stand out like a sore thumb and looks totally out of place.
The inevitable extra traffic would cause increased congestion at Send Mays Corner crossroads. Combined with the extra traffic on the Send Road due to the other increases at Garlicks Arch and Burntcommon, and the whole area would become unsustainable.

With the proposed extra numbers of houses at Garlicks Arch & Clockbarn sites it would overcome the current infrastructure.

This site was sensibly removed from an earlier version of the Local Plan, and was re introduced in July. Why?

Attached documents:

Comment: MM48 - LPMM18/2939  Respondent: Sarah Wright 10543937  Agent:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

Comment: MM9 - LPMM18/2935  Respondent: Sarah Wright 10543937  Agent:

I object to Modification MM9 Green Belt Policy due to the following points:

The modifications in this policy are supposed to protect the Green Belt. However in reality, they allow ‘limited infilling outside the identified settlement boundary’ in certain circumstances. In other words, a loophole which allows indiscriminate development.

Attached documents:

Comment: MM27 - LPMM18/318  Respondent: Mrs Janet Govey 10544353  Agent:

They’re really bad traffic implications for send but common cock barn  Wisley

The 83 changes and the Clarendon slip roads are not properly addressed Guildford Borough Council need to do proper assessments on the impact of all of the traffic in the centre area and the thousands more cars then will be heading towards Woking every day causing even more congestion on the road that is regularly gridlocked increasing noise delay is gridlocked and increasing the nitrogen dioxide pollution on road that has a school and a nursery.

Attached documents:
An increase of 37% in the number of houses proposed is excessive
7000 objections to the previous lower numbers have been ignored
It is greenbelt containing H and woodland
It is greenbelt containing Ancient woodland
It will join send and Ripley and constitute overdevelopment
This site slots regularly and has lots of lead shot in the ground
There will be at least another 7 to 800 cars which will block up the roads in the area
The school is a medical facilities in the area already breaking point and will not be able to cope

I’m writing to object on a number of policies that are being resubmitted by Guildford Borough Council
MM41 policy A43
I’m objecting to the 37% increase of the number of houses this is very excessive why were the 7000 previous objections ignored this area is all ancient woodland and greenbelt and needs to be just preserved it will join send in Ripley and constitute over development. This area floods the whole time and is contaminated by lead shot not suitable for development. There will be at least an extra thousand plus cars and these will block up all of the roads in the area causing gridlock schools and medical services are already at breaking point and will not cope with new developments.

For planning for this area has at least doubled in size since the original 2014 plan
It will be the largest industrial allocation any village in the area if it goes through
Why do we need to put industrial areas on greenbelt when Sly Field is sitting there on used
Assessments have shown that there is a reduction in demand for industrial land so why not use greyland
Send already has a 25% increase of the business centre this makes it even bigger
The infrastructure of the area will not cope and the roads will be gridlocked there will be contamination and pollution in the air.

Attached documents:

**Comment: MM42 - LPMM18/358**  **Respondent:** Mrs Janet Govey 10544353  **Agent:**

MM42 policy A58

The industrial storage area has doubled in size since it was originally deleted in 2014 it is by far the largest industrial area in the borough huge concentration and send, the land assessment shows that there is a reduction in demand for industrial land. Why do we have a new industrial estate in send when we have Slyfield Which is used and has the capacity.

Attached documents:

**Comment: MM44 - LPMM18/315**  **Respondent:** Mrs Janet Govey 10544353  **Agent:**

With all of the developments taking place there and extra 770 houses to the 1700 currently and send this as an increase of 45% to match for the infrastructure schools roads and medical services.

With all of the developments taking place there and extra 770 houses to the 1700 currently and send this as an increase of 45% to match for the infrastructure schools roads and medical services.

This site was deleted earlier because of all of the injections and now it has been reinstated why has that happened.

This area is a greenbelt sign and there are no special second stances should be no building contradicts policy MM9

It will detract from the heritage buildings and send Marsh Green

There will be increased traffic which will cause great problems in an area that has already serious traffic issues particularly at Send Cross Road.

Attached documents:

**Comment: MM44 - LPMM18/359**  **Respondent:** Mrs Janet Govey 10544353  **Agent:**

MM44 policy A63
This is a new site for 120 homes and was deleted from an earlier draft because of all the objections and it has now been re-inserted why!

This is greenbelt land and should not be built on there is a Heritage site in the area and once again the increase of traffic will put great pressure on the secondary roads which are already at breaking point, there is an increase of 45% of development in the village this is far to high, 550 Garlicks Arch, Click Barn barn, Wind ridge

Attached documents:

Comment: MM9 - LPMM18/317  Respondent: Mrs Janet Govey 10544353  Agent:

The MN9 Greenford belt policy claims to protect the greenbelt except in very special special second stances Guildford Borough Council make an exception for limited inFilling. This results in uncertainty and basically stops the effectiveness and greenbelt protection any land on the edge of the village could now easily be picked off and use for development this is an open invitation for developers and speculators and all of this done at the expense of Surrey residents

Attached documents:

Comment: MM9 - LPMM18/360  Respondent: Mrs Janet Govey 10544353  Agent:

MM9

These modifications by Surrey County Council claim to protect the greenbelt except in very special situation this now leaves the village with considerable uncertainty and effectively negate the greenbelt protection any land on the edge of our village could not be picked up by development and is an open invitation to speculant developers at the expense of the residents.

I have also objected to these modifications on the get involved website, I hope that this time the council sees sense and listens to reason and very strong public feeling.

Attached documents:

Comment: MM2 - LPMM18/2453  Respondent: Anne Davies 10551937  Agent:

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
   1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
   2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
   3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

**E. The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/2456 **Respondent:** Anne Davies 10551937  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**
**Comment: MM3 - LPMM18/2454  Respondent: Anne Davies 10551937   Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**F. The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

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**Comment: MM31 - LPMM18/2457  Respondent: Anne Davies 10551937   Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment: MM32 - LPMM18/2458  Respondent: Anne Davies 10551937   Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

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**Comment: MM33 - LPMM18/2459  Respondent: Anne Davies 10551937   Agent:**
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2460  Respondent: Anne Davies 10551937  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2461  Respondent: Anne Davies 10551937  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2462  Respondent: Anne Davies 10551937  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2455  Respondent: Anne Davies 10551937  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Agent: I am objecting to your modification development reference MM41 at Garlicks Arch, Send Marsh, Policy A43.
On the following grounds:
I find amenities in Send ie.: our Roads (traffic congestion), Schools, Medical (GPs), Shops, and Public Transport, are already under pressure in terms of capacity and often quality.
I cannot imagine how existing amenities will cope with another 400 new homes, let alone the increase to 550, ie.: with another 1000 or so extra people.

Agent: I am objecting to all your modification developments reference MM41, MM42 and MM44, Policies A43, A58, and A63 - taken as a whole.
These are huge changes in relation to the size of the village.
Their impact will be devastating. Thinking about the inevitable traffic chaos alone fills me with gloom.

You have gone over the top in targeting Send, like as if you have a vendetta.

Attached documents:

Comment: MM42 - LPMM18/2606

Agent: I am objecting to your modification development reference MM42 at Burnt Common, London Road, Send, Policy A58.
On the following grounds:
There seems something questionable about your preference for this development now, after it was cancelled earlier.
In general I don't like to see Green Belt being eroded bit by bit, but specially here - for no good reason.
This is actually still a piece of genuine Green Belt, and I do not think you have justified the "very special" circumstances required for using it at all, and particularly for something as urban as an industrial estate.
Your proposed increase in capacity is just adding insult to injury.

Also, the long-term effect will be: with it being in a triangle and adjoining with land occupied by Ewbank Auction house at the tip of the triangle, eventually.
from the tip, along the A3, there will be only about 500yds of Green Belt to the borders of Burpham, as extended by Gosden Hill development.
Therefore, in less that 10 years, what was mostly Green Belt will be one (not quite but almost) huge urban sprawl from Guildford to Ripley.

Agent: I am objecting to all your modification developments reference MM41, MM42 and MM44, Policies A43, A58, and A63 - taken as a whole.
These are huge changes in relation to the size of the village.
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Attached documents:

Comment: MM44 - LPMM18/2607
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Attached documents:

Comment: MM27 - LPMM18/2197  Respondent: John Creasey 10563457  Agent:

MM27/MM41/MM42 and MM48 Transport Strategy

I object to the proposed changes to the A3 junction at Burnt Common. The increased traffic on the A247 through Send will be intolerable as at peak times it is already at capacity. It will cause unavoidable congestion, pollution and traffic will come to a standstill.

Attached documents:

Comment: MM41 - LPMM18/2193  Respondent: John Creasey 10563457  Agent:

MM41 Land at Garlicks Arch, Send March, Policy A43

I object to the huge increase to the number of proposed number of houses from 400 to 550 to built at Garlicks Arch which amounts to a 37% increase despite 7,000 objections to the previous lower number.

450 of which to be built in the first five years.

This site is subject to frequent flooding and contaminated by leadshot.

The land in question is green belt containing ancient woodland and with this number of houses Send and Ripley will be joined up and cease to separate villages. It will constitute over development.

Traffic in the area is already extremely heavy at peak times and this amount of houses will mean at least another 800 cars.

The school and Medical facilities will be strained to breaking point.

Attached documents:

Comment: MM41 - LPMM18/2198  Respondent: John Creasey 10563457  Agent:

MM27/MM41/MM42 and MM48 Transport Strategy

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<td>I object to the amount of land planned for industrial and storage use and would make this the largest industrial allocation in any village in the borough. This will be on previous green belt land, which is completely unnecessary when Slyfield has unused capacity.</td>
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Attached documents:

Comment: MM9 - LPMM18/2196  Respondent: John Creasey 10563457  Agent:

MM9 Green Belt Policy

I object to Guildford Borough Council policy on the green belt, where land can be considered within the village.

This also means that any land within our village could be picked off for development, an open invitation to developers and speculators to the detriment and at the expense of residents.

Surely the Government's Policy is to protect the green belt.

Attached documents:

Comment: MM27 - LPMM18/2205  Respondent: Hazel Creasey 10563777  Agent:

MM27/MM41/MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM41 - LPMM18/2201  Respondent: Hazel Creasey 10563777  Agent:

MM41 Land at Garlicks Arch, Send March, Policy A43

I object to the huge increase to the number of proposed houses to built at Garlicks Arch which amounts to a 37% increase despite 7,000 objections to the previous lower number.

The land in question is green belt and with this number of houses Send and Ripley will cease to be separate villages.

Traffic in the area is already extremely heavy at peak times and this amount of houses will mean at least another 800 cars.

The School and Medical Facilities will be overwhelmed.

MM27/MM41/MM42 and MM48 Transport Strategy
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MM9 Green Belt Policy

I object to Guildford Borough Council policy on the green belt, where land can be considered within the village.

Surely the government's policy is to protect the green belt.

Attached documents:

Comment: MM41 - LPMM18/2429  Respondent: Sheila Mardle 10565569  Agent:

Objection to development MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Dear Sir

As a resident of Send I wish to object strongly to the above proposal on several grounds AS OUR PREVIOUS OBJECTIONS HAVE BEEN IGNORED.

The land involved is Green Belt and ancient woodland and is often subject to flooding and no doubt has contamination from lead shot. It will constitute over development by joining Send and Ripley.

Our roads cannot take the extra traffic in the area as local residents have been aware of for many years and pedestrians are already affected by road crossing problems, inadequate footpaths and excessive traffic fumes on our roads.

With the closure of Ripley school and nursery our school is already stretched and adding all the proposed homes on this site will stretch both school and medical facilities to breaking point.

Attached documents:

Comment: MM42 - LPMM18/2430  Respondent: Sheila Mardle 10565569  Agent:

MM42, policy A58

i object to the reinstatement of this proposal deletrd from the 2014 plan.

This proposal increases the area considerably although there is unused capacity at SLYFIELD.

Send Business Centre has already increased capacity of 25% importantly our local roads and lanes are already under pressure and regularly gridlocked. Living on Send Road I am very aware of this fact especially on weekdays.

Attached documents:

Comment: MM44 - LPMM18/2431  Respondent: Sheila Mardle 10565569  Agent:

MM44, Policy A63
I object to this development, already deleted due to the strength of objections and very belatedly re-inserted.

This is Green Belt land and development would contradict policy MM9.

As with other proposed developments in Send, the additional traffic it would bring to the village will be totally unacceptable especially at Send crossroads.

Attached documents:

**Comment: MM9 - LPMM18/2432**  **Respondent:** Sheila Mardle 10565569  **Agent:**

**MM9, GREEN BELT POLICY**

Our Green Belt must be protected and not become an open invitation for speculators and developers to ruin our village at residents expense.

Send is an excellent community and we the residents already are subject to transport and road problems. We have a lovely recreation ground which is difficult to cross Send Road to access and considerable parking problems at Send School. Our local shops are all located on one side of Send Road. More traffic through our village and surrounding roads would be a nightmare to both young and old residents of Send.

These planning proposals are are far too much for one village. Once again residents ask WHY SEND?

Attached documents:

**Comment: MM2 - LPMM18/4599**  **Respondent:** Laura Richards 10570977  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high
In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
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6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
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9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the
Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined. 

MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

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**Comment:** MM23 - LPMM18/4602  **Respondent:** Laura Richards 10570977  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates. 

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of **“green approaches”** should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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**Comment:** MM23 - LPMM18/4610  **Respondent:** Laura Richards 10570977  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM3 - LPMM18/4600  **Respondent:** Laura Richards 10570977  **Agent:**
MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3.Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

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Comment: MM31 - LPMM18/4603  Respondent: Laura Richards 10570977  Agent: 

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

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Comment: MM32 - LPMM18/4605  Respondent: Laura Richards 10570977  Agent: 

MM32 A height limit for White Lion Walk is required.

Attached documents:

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Comment: MM33 - LPMM18/4606  Respondent: Laura Richards 10570977  Agent: 

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:
Comment: MM35 - LPMM18/4607  
**Respondent:** Laura Richards 10570977  
**Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

Comment: MM41 - LPMM18/4608  
**Respondent:** Laura Richards 10570977  
**Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

Comment: MM44 - LPMM18/4609  
**Respondent:** Laura Richards 10570977  
**Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

Comment: MM9 - LPMM18/4601  
**Respondent:** Laura Richards 10570977  
**Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

Comment: MM41 - LPMM18/2329  
**Respondent:** Iris Prole 10582145  
**Agent:**

Re: High Noon For Send

1) The disgusting plan for building at Burnt Common, the area will be ruined. With the space at Slyfield Green I feel it is unnecessary. WHAT HAPPENED TO GREEN BELT.
Attached documents:

Comment: MM44 - LPMM18/2330  Respondent: Iris Prole 10582145  Agent:

2) Land at Aldertons Farm to have 120 homes built will be a complete turn around from previous plan. A big mistake for the beautiful heritage buildings on Green at Send Marsh. The Garlicks Arch plans to increase by 770 houses will make the road & the crossroads would be a traffic disaster.

Send Marsh Road is already queued traffic from Portsmouth Road down to Sadlers Arms Pub every working morning.

This join Ripley to Send is losing both sites as villages they will be one long area.

The fact that we have a school in Send which is full and a school in Ripley which is closed.

I medical centre, 1 useless post office between Ripley and Send & the co-op at Ripley for shopping. All this extra housing will cause havoc is this really necessary?

I feel the whole plan is stupid it seems it has not been carefully worked out!!

Attached documents:

Comment: MM2 - LPMM18/5157  Respondent: G Rabin 10617601  Agent:

I wish to object on the following grounds.

I should like to call for the examination to be re-opened so that latest Office of National Statistcs can be used regarding household projections.

There is no need for Guildford to take Woking’s unmet need as this will require building on green belt.

The council needs to make development in the town centre first, the urban area and brownfield site before moving onto villages or green belt.

the addition of 500 houses in Send will impact severely on the Portsmouth Road which hasn’t been taken into consideration.

Attached documents:

Comment: MM3 - LPMM18/5158  Respondent: G Rabin 10617601  Agent:

Some of the retail areas in Guildford could be put to better use providing sustainable housing.

Attached documents:
Comment: MM41 - LPMM18/5159  Respondent: G Rabin 10617601  Agent:

A3 is congested and any time there is a breakdown or accident the road grinds to a halt. This happens weekly if not daily.

Air pollution should be a priority.

The size of the SNCI is drastically reduce even though the site qualifies on ecological grounds. The biodiversity will be destroyed.

Attached documents:

Comment: MM2 - LPMM18/3134  Respondent: Wendy Critchlow 10619169  Agent:

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure, eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, and Woking’s need figure has also reduced and has not been examined.

Attached documents:

Comment: MM35 - LPMM18/3135  Respondent: Wendy Critchlow 10619169  Agent:

MM35 Gosden Hill should be removed from the Plan. Revised housing need figures weaken the justification for development. Traffic congestion on the Epsom Road is already very serious, particularly at school run times. If Gosden Hill were to become a new cut from the A3, congestion in the area where I live would be totally unacceptable. REMOVE GOSDEN HILL FROM THE PLAN.

Attached documents:

Comment: MM2 - LPMM18/1057  Respondent: Rosemary Drew 10619201  Agent:

5 The planning team should make a more thorough investigation of the potential of our brownfield sites, and get an update on the number of new housing units required for Guildford.
I have made these points because I am aware of the fact that once decisions are made there will be actions taken which may have irrevocable consequences. We have to get it right.

Please accept my gratitude towards the Planning Policy team for the huge amount of work you have put into this project for Guildford.

Attached documents:

**Comment:** MM23 - LPMM18/1056  **Respondent:** Rosemary Drew 10619201  **Agent:**

4 MM23 - POLICY D1

Guildford Borough Council, as a major landowner in the centre should be bound by the same obligations as imposed on the other strategic site owners by the council as planning authority.

Attached documents:

**Comment:** MM3 - LPMM18/1055  **Respondent:** Rosemary Drew 10619201  **Agent:**

As a resident of Guildford for more than 30 years, I wish to record my views on the Schedule of Main Modifications of the Local Plan for Guildford:

1 MM3 - POLICY S3

It is important that Guildford Borough Council achieve coordinated results. The heart of Guildford, the Town Centre must be designated as a strategic site, to include not only the High Street and North Street, but those narrower but potentially attractive neighbouring streets and buildings, which in many cases have been hitherto neglected. The success of the recent work in Tunsgate should be an inspirational example to our planners.

2 MM3 - POLICY S3

Guildford must have an effective local plan which will be clearly stated, and operative, before any other future development prevents the fulfilment of creative and workable projects. The eventual entity should be of a consistently high standard, to make our town attractive to people who wish to live, work, visit, study, and participate in the life of this historic but progressive town.

3 MM3 - POLICY S3

The Guildford Borough Council should adopt the proposals of Guildford Vision Group including the new crossing or equivalent, to deliver a safer, pedestrianised town centre with transport resilience and access to attractive riverside, to include an attractive environment where people of all ages can spend their leisure time.

Attached documents:

**Comment:** MM2 - LPMM18/2552  **Respondent:** Wiesia Taylor 10641953  **Agent:**

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818 of 2554
GBC Local Plan consultation

I am writing to comment on modifications made to three policies in the latest version of the Guildford Local Plan.

1. a) Modification MM2  Policy S2, Spatial Development Strategy:

Latest Government figures on population and housing projections show substantially lower growth that in previous figures, which are the ones used by GBC in basing its housing needs. I have seen some commentators argue the new projections are around 40% below those currently used in the local plan. Whichever is correct it is clear that the numbers in the Local Plan are much too high. They must be reduced substantially or else Guildford will end up with a plan that leads to excessive housing.

Perhaps GBC should re-open the examination to allow the correct numbers to be used? Alternatively GBC could simply propose numbers which are lower and more realistic in the current market context.

Also I would comment that the notion that Guildford borough needs to build more homes to compensate for under-shooting in Woking is plainly absurd. Where do they find these examiners?

I OBJECT to the housing numbers set out in Modification MM2 – a substantial reduction is needed.

Attached documents:

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Comment: MM40 - LPMM18/2554  Respondent: Wiesia Taylor 10641953  Agent:

1. c) Modification MM40  Site Policy A35, the former Wisley airfield:

The Secretary of State has refused the appeal of the site owner to develop this site. His reasons for refusing were clear and strong. But GBC have still retained this site within the Local Plan. Why? This site should be removed from the Local Plan at once because:

1. a) It is unsustainable;
2. b) It is wholly dependent upon major infrastructure projects which are very uncertain;
3. c) It fails the Exceptional Circumstances test for Green Belt release;
4. d) The site will have a ‘catastrophic’ impact on the character of Ockham;
5. e) The site is not needed to meet housing needs within the Local Plan.

GBC should immediately remove this site from the Local Plan.

I OBJECT to having Site Policy A35 in the Local Plan.

Attached documents:

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Comment: MM9 - LPMM18/2553  Respondent: Wiesia Taylor 10641953  Agent:

1. b) Modification MM9  Policy P2, Green Belt:

A lot of evidence has been presented by East Horsley parish council to show that the proposed insetting of the village from the Green Belt is unsound. However, Policy P2 is still proposing the insetting of East Horsley, despite all the errors...
identified in the Pegasus Green Belt & Countryside Study used to justify the insetting of East Horsley. Is anyone in Millmead listening?

GBC should remove this insetting policy from the Local Plan.

I OBJECT to the insetting of East Horsley as proposed in Policy P2.

Attached documents:

Comment: MM2 - LPMM18/2118  Respondent: Mr Roy Baker 10649185  Agent:

Please see comments re Overall Numbers and Gosden Hill Farm as attached

[text of attachment are reproduced below]

MM2

The number of dwellings is far too high at 630. It should be less than 500. The assessment does not take into account the latest population demographics available this summer that indicate lower demand than first thought and planned for. Secondly there is no discussion anywhere that the so called deficit is correct and should therefore be added to the current assessments. No business planning is done on this basis. Business planning takes account of the current position and future projections it does not carry forward from the past its mistakes and add to them it presumes its existing assessments are later and more up to date. Therefore the 20% loading must be eliminated from the dwelling figures. The numbers of dwellings for the students is also based on the false premise that there is no available or potentially made available accommodation, and also that the students are a permanent population -they are not. Woking has not made available Green Belt land that it admits it has available nor is it properly up to date with its assessments. Since Guildford has made green Belt land available and is in an area of outstanding natural beauty that Woking is not - it follows that until Woking has properly assessed itself Guildford should not take on any under provision of Woking as a permanent part of Guildford's plans until Woking has completed them. Finally the number of sutes for gypsies and travellers is far too high. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

Attached documents: re MM2.docx (16 KB)  re Gosden Hill Farm.docx (15 KB)

Comment: MM35 - LPMM18/6269  Respondent: Mr Roy Baker 10649185  Agent:

MM35

This cannot be allowed to go ahead unless and until proper infrastructures are present. This covers not only the normal house services such as water gas and electricity and sewerage etc but more particularly the roads. At present the roads are barely adequate in the area as in the mornings from the A246 down to the second roundabout in Park lane there is a queue. If there is no access both north and southbound off the A3 there will be an impossible situation either by the railway bridge or on the roads that lead past Sainsbury's to the northbound A3. In addition the provision of a railway station will entice further traffic from the south down Park Lane towards the station and prevent reasonable access to Park
Lane from Kestrel Close. Apart from this the road towards the roundabout by the BP garage is nearly always blocked not only because of the southbound traffic towards Guildford and the blockage caused by Aldi.

Attached documents:

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**Comment:** MM45 - LPMM18/1182  **Respondent:** Mr Paul Wordingham 10651105  **Agent:**

There is no justification in allowing the use of green belt land for building new housing in the Normandy and Flexford area. There is adequate brownfield land in the Guildford area to accommodate extra housing needs. There is also inadequate road and sewerage capacity in the area to allow for such a large number of houses to be built.

Attached documents:

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**Comment:** MM2 - LPMM18/1889  **Respondent:** Trudi Harris 10667073  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

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I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

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**Housing Number and the Green Belt**

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The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

**Attached documents:**

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**Comment:** MM2 - LPMM18/1890  **Respondent:** Trudi Harris 10667073  **Agent:**

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.
MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/1893  Respondent: Trudi Harris 10667073  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/1972  Respondent: Trudi Harris 10667073  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/1891  Respondent: Trudi Harris 10667073  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.
MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

**Comment:** MM3 - LPMM18/1971  **Respondent:** Trudi Harris 10667073  **Agent:**

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

   MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

   MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

   Attached documents:

**Comment:** MM31 - LPMM18/1894  **Respondent:** Trudi Harris 10667073  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

**Comment:** MM33 - LPMM18/1967  **Respondent:** Trudi Harris 10667073  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB

Attached documents:

**Comment:** MM35 - LPMM18/1968  **Respondent:** Trudi Harris 10667073  **Agent:**
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/1969  **Respondent:** Trudi Harris 10667073  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment:** MM44 - LPMM18/1970  **Respondent:** Trudi Harris 10667073  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment:** MM9 - LPMM18/1892  **Respondent:** Trudi Harris 10667073  **Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM41 - LPMM18/1135  **Respondent:** Mrs Jennifer McIndoe 10670529  **Agent:**

I object to this proposal on the following grounds:

1. 7000 people objected to the previous proposal for 400 homes on this site; I feel sure that their objection was not because they considered that this was too few homes! The proposal for an almost 50% increase to the number already rejected by local residents is nothing short of insulting!!

2. The proposed site is Green Belt and contains ancient woodland which should be protected.

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3. If the proposal were to go ahead, even more pressure would be put on already over-crowded roads, schools and medical facilities.

Attached documents:

**Comment: MM42 - LPMM18/1141  Respondent: Mrs Jennifer McIndoe 10670529  Agent:**

I object to this proposal because the site is not suitable for the size of development envisaged. Burnt Common and the surrounding area already has more traffic than the roads can cope with at times. A further 14800 sq.m. of industrial and storage space would not only greatly increase the local traffic of private vehicles but also large commercial vehicles for which local roads were not designed. This will only lead to more congestion and danger on local roads. There are other more suitable brown fill sites in Surrey which should be utilised before encroaching on the Green Belt.

Attached documents:

**Comment: MM44 - LPMM18/1144  Respondent: Mrs Jennifer McIndoe 10670529  Agent:**

I object most strongly to this proposal because, if it were to go ahead, it would completely change the character of Send Marsh and cause a great deal more traffic and resulting pollution in the area. Send Marsh Road is already used as a "rat-run" and any increase in, particularly, commercial, traffic would constitute an increased danger to pedestrians and cyclists using it.

The site is Green Belt, and, as such, should be protected from this kind of unnecessary development. There is little or no demand for existing housing, let alone new housing, in the Send Marsh area.

I understand that this proposal has previously been rejected because of the objections of local residents. Nothing has changed.

Attached documents:

**Comment: MM41 - LPMM18/214  Respondent: Clare McCann 10677665  Agent:**

I wish to object to the modifications to the Guildford Plan as I understand previous letters on the subject are just ignored. I hope this time there will be more regard taken of local views especially as it now seems that local housing requirements have been overestimated.

**MM41 land at Garlicks Arch, Send Marsh Policy A43**

This development is wrong on so many levels

- It will destroy ancient woodland and create ribbon development from Ripley to Send thereby damaging the integrity of the two villages which go back to the time of Domesday and before.
- The new homes proposed take no account of the infrastructure required to sustain them. Both the school and the medical centre in Send are at capacity - not helped by the incompetence and or duplicity of SCC and the diocese in closing Ripley School.
• The local roads are already very busy and 550 homes could well lead to an extra 800-1000 cars - increasing congestion and pollution.
• If new slip roads onto the A3 go ahead this will gobble up more land to very little benefit as the adjoining roads (from Clandon and Send) cannot be widened to accommodate extra cars and as we all know the A3 at Guildford gridlocks everyday as it is.

Attached documents:

Comment: MM42 - LPMM18/215  Respondent: Clare McCann 10677665  Agent:

MM42 land at Burnt Common London Road, Send Policy A58

Once again this development is wrong headed - not because the site should remain undeveloped but because it is the wrong kind of development.

• A huge new industrial site is not needed and certainly not here as it will suck more traffic into the village, once again putting strain on roads and services.
• I understand the requirement for more industrial space is far from proven. I think the current space is currently unlet and that there is still capacity at Slyfield.
• This space would provide land for social housing or starter homes if good noise barriers were built along side the A3 and could also possibly provide for the traveller site, which if properly screened would be far more accessible and less intrusive than destroying Send Hill, which is too narrow for caravans and which opens out on to one of the few open green spaces in the village.

Attached documents:

Comment: MM44 - LPMM18/216  Respondent: Clare McCann 10677665  Agent:

MM44 land at Alderton's Farm, Send Marsh Road Policy A63

• This has recently been re-inserted after the previous objections were accepted...why? especially as the housing numbers have now been called into question
• [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] I have recently completed a study re the development of the village of Send and it is quite clear that Send Marsh is one of the most ancient parts of the village and has had a distinct identity dating back hundreds of years but it will be forever compromised if this development goes ahead.

The total number of houses proposed in Send is 770 which is totally out of proportion to the size of the village.

Perhaps this is because Send dared to vote in independant councillors - a theory postulated by a retired CONSERVATIVE county councillor!

I am not a NIMBY and I fully accept that we need more houses but we do not have to accept more because Woking have not built enough nor do we have to accept development in the wrong places. Local people write in good faith but feel they are not listened to. Local planners do not, in my view, plan but react to what developers want - which is to make money by building on greenfield sites. If you really want to make a plan then you could and should consult parish councils and town wards as to where additional housing would make the least impact and then approach the land owners or landlords.
with proposals for sensitive development. How many premises in Guildford have space over shops empty or are entirely empty that could be adapted for domestic use - have you ever carried out a proper study?

Attached documents:

Comment: MM2 - LPMM18/4568  Respondent: Paul Edwards 10682529  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
   3. There is too much reliance on A3 improvements and these are beyond the council’s control.
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit.
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by that organisation in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of
congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM2 - LPMM18/1176 **Respondent:** Margaret Bruton 10683457  **Agent:**

I would like to register my opposition to the latest modifications of the Guildford Local Plan which are relevant to Send.

The Office of National Statistics’ prediction is that there is a decrease in the previously anticipated number of houses needed in Guildford and this has important consequences for the proposed developments in Send. The Local Plan modification will enable increase in housing in Send over and above those in the original Local Plan proposal. These new ONS figures make it unnecessary to plan in extra housing in Send.

I specifically object to development at the site at Alderton’s Farm (MM44). And is a valuable green area which is an important part of the rural character of the village of Send and housing here would destroy this important area. In addition houses on this site would lead to further congestion at busy times of day at either end of Send Marsh Rd (B368) where it either joins the Portsmouth Rd (B2215) or the already congested A247 at May’s Corner.

I further object to the modifications as I think they will cause a dangerous increase in traffic. Neither the Alderton’s Farm site (MM44) and Garlick’s Arch (MM41) have good public transport or cycle paths and the pavements along Send Marsh Rd are very narrow so there would be an inevitable increase in the number of car journey’s to and from these sites.

Send school is on the A247 and there are already safety concerns about parking and children crossing the road so extra traffic would increase this danger.

Furthermore these additional houses would put extra pressure on the already busy medical centre and the school which is a new build and is already full.
I also object to the allocation of industrial premises Burnt Common.

To exit this site it is necessary to go South along the Old London Rd (B2215) and the to turn right along a narrow strip then right again onto the north bound slip road of the A3. This is presently very dangerous as traffic leaving the A3 have very little time to see and slow down for lorries leaving the distribution centre and crossing on to the north bound A3 slip road. Extending the site would make this an even more dangerous hazard.

Attached documents:

Comment: MM41 - LPMM18/1175  Respondent: Margaret Bruton 10683457  Agent:

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Attached documents:

Comment: MM2 - LPMM18/5002  Respondent: Ben Gamble 10701537  Agent:

The Strategic Housing Market Assessment (SHMA) is of great concern. Why should the borough take the unmet need of Woking Borough Council (630 homes) – MM2 4.1.9aa. The recent publication of updated household projections by the Office for National Statistics showed significantly reduced figures. It could be calculated that the household projections for Guildford would suggest a household growth (and hence a housing need) that is significantly lower than that suggested using the 2014 projections. The recalculations will also apply to Woking Borough Council and eliminate the need for GBC to take up any shortfall within Woking Borough. Considering GBC & Woking Borough Council updated predictions, GBC must recalculate the SHMA to reflect the lower projections.

Attached documents:

Comment: MM3 - LPMM18/5003  Respondent: Ben Gamble 10701537  Agent:

The Plan does not reflect the evolution that is occurring in the retail sector, with the growth of online and the shrinking of the high street (MM3). The is no need for an additional 40,000 SQM of retail space. There is already amble retail accommodation in in Guildford town centre, with units being available to rent/buy. No doubt with the regular news of retailers and “casual dining” operators struggling further space will come available. It would be far better to have a smaller vibrant town centre than one filled with vacant shop units. It would make more sense to include provision of more residential units within the central area of Guildford that offer excellent employment opportunities and sustainable transportation.

Attached documents:
I make the following comments in regard to the modifications to the Local Plan:

Sites A43 Garlick’s Arch; A63 Aldertons Farm; and A58 Burnt Common Strategic Employment Site will have significant combined impacts upon the villages of Ripley, Send and Send Marsh. The development of these sites will increase the traffic on already over crowded and busy roads in these villages.

It is extremely concerning that there does not seem to be any firm commitment to the construction of policy site A43a the A3 Burnt Common slip roads during the period of the Plan. It is vital that this is constructed prior to developing the above sites.

The development of these site do not provide enough community infrastructure Ripley Primary School has recently been closed by Surrey County Council. The Villages Medical Centre is already heavily subscribed.

Attached documents:
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3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

**MM2** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

**MM2** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

**MM2** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

**MM2** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

**MM2** Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment: MM23 - LPMM18/5030  Respondent: Frank Fuller 10703745  Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.
MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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**Comment:** MM23 - LPMM18/5038  **Respondent:** Frank Fuller 10703745  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM3 - LPMM18/5028  **Respondent:** Frank Fuller 10703745  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

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**Comment:** MM31 - LPMM18/5031  **Respondent:** Frank Fuller 10703745  **Agent:**

---
MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**

**Attached documents:**

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**Comment:** MM32 - LPMM18/5032  **Respondent:** Frank Fuller 10703745  **Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

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**Comment:** MM33 - LPMM18/5033  **Respondent:** Frank Fuller 10703745  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

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**Comment:** MM35 - LPMM18/5034  **Respondent:** Frank Fuller 10703745  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/5035  **Respondent:** Frank Fuller 10703745  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.
**Comment:** MM44 - LPMM18/5037  **Respondent:** Frank Fuller 10703745  **Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

**Comment:** MM9 - LPMM18/5029  **Respondent:** Frank Fuller 10703745  **Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Comment:** MM2 - LPMM18/1986  **Respondent:** Julian Spooner 10708577  **Agent:**

Please note my concerns…

- MM2 - current housing figures in the plan are grossly exaggerated and need revising; if Woking has a genuine housing need, surely it can only be met in Woking.

**Comment:** MM9 - LPMM18/1987  **Respondent:** Julian Spooner 10708577  **Agent:**

- MM9 - it is unacceptable to lose any more Green Belt with current levels of wildlife extinction and illegal air pollution.

Worplesdon has been sneaked in to the modified local plan, without consultation, as a village earmarked for development?

Why didn’t they consult us or tell us? How has this been allowed to happen?

The government inspector should delay or reject the modified plan…

MM9 Worplesdon is in the Green Belt, is an historic village with extensive Conservation Area and Special Protection Area with protected species in danger of extinction, and a site of Special Scientific Interest. There has been no democratic consultation surrounding it’s sudden, disingenuous, inclusion in the modified local plan. Please, therefore, exclude it.
POLICY S2

I object that the figure for Guildford Borough housing need used by the Inspector was 789 per annum. This has been discredited as shown to be a high over-estimate and therefore is an unreliable and irrelevant basis on which to plan housing for the area.

I object that GBC is using failing to acknowledge and amend their discredited figure of 789 per annum when Barton Willmore – a respected consultancy – has said that the correct figure should be 431[1].

I object that GBC is not considering relevant data when proposing housing need and this will impact on and encourage excessive development in Send and destroy our village and its character.

I object that GBC is proposing to amend its housing need by considering September data from the OFFICE FOR NATIONAL STATISTICS which suggests that appropriate growth for Guildford Borough can be achieved with 460 houses a year.

I object that GBC fails to take into account publicly available data which proposes a much lower number of housing need for our borough and village and - in opposition to the sustained and numerous objections from residents - instead proposes numbers and developments which would please only house builders and developers.

[1] At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are hugely less than the total assumed by the Inspector. This could make a massive difference to developments in Send.

Attached documents:
The local plan in its current form illustrates the continued failure of GBC to provide a plan that is fit for purpose, supported by competent data made available in the public domain, which provides for the needs of current residents, and secures the best future for them and LISTENS TO LOCAL VOICES.

MM41 LAND AT GARLICK’S ARCH, SEND MARCH, POLICY A43

- I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide ‘exceptional circumstances’ to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.

- I object that this development is proposed on Green Belt Land and will destroy countryside and ancient woodland.

- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.

- I object because local infrastructure will not be able to support the additional demands of new residents.

- I object because local schools and medical facilities will not be able to support the massive increase in demands resulting from this plan.
  - I object because wildlife will be displaced.
  - I object because the site is subject to frequent flood, which will only worsen with increased buildings and ground coverage.
  - I object because the land is contaminated by lead shot and this will compound the problem of increased flooding as outline in my previous objection and be detrimental to health and well-being.
  - I object to GBC ignoring the 7,000 previous objections raised by local residents with regard to developing this area.
  - I object to GBC increasing by 37% the number of houses in this development, which is excessive and not supported by need but demand and proposed to promote excessive and unnecessary housing development in this area.
  - I object to this development as it will ‘join up’ Send and Ripley and local character will be destroyed by this over development.
  - I object that GBC continues to stand by its discredited and unreliable estimate for future housing need and fails to adjust this downwards by considering its erroneous assumption about student population forecasts in Guildford. This would of course impact on housing need across neighbouring areas including Send.

Attached documents:

Comment: MM41 - LPMM18/1124  Respondent: Alison Drennan 10717985  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM42 - LPMM18/1120  Respondent: Alison Drennan 10717985  Agent:
MM42 LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

- I object to the proposal that an industrial unit be developed in this area, and the failure to demonstrate need or benefit.
- I object to GBC proposing this development in the face of the Employment Land Needs assessment showing a reduction in demand for industrial land. It is not desired nor justifiable.
- I object to GBC proposing building this site, without demonstrating special circumstances and contradicting
- I object to GBC proposing the development of industrial sites in the Green Belt where there is unused capacity in Slyfield.
- I object that this proposal, coupled with 25% increase at Send Business Centre means there is a much bigger concentration of such land use with no proven demand, and is both disproportionate and unfair when comparing Send with other villages.

Attached documents:

Comment: MM42 - LPMM18/1125  Respondent: Alison Drennan 10717985  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM44 - LPMM18/1121  Respondent: Alison Drennan 10717985  Agent:

MM44 LAND AT ALDERTON’S FARM, SEND MARSH ROAD, POLICY A63

- I object to the late inclusion of this site, deleted from an earlier draft due to the strength of local objections and that GBC ignore these by only re-inserting this proposal at the public examination in July.
- I object to this development as it will contradict Government guidance in their proposals to build on Greenbelt land and because GBC fail to provide ‘exceptional circumstances’ to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
- I object that this development is proposed on Green Belt Land and will destroy countryside.
- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
- I object because local infrastructure will not be able to support the additional demands of new residents.
- I object because wildlife will be displaced.
- I object because GBC continues to promote excessive and unnecessary housing demand, rather than allowing for open and democratic evaluation of housing need in the area.
- I object because this additional development will result in traffic and increased pressure on already over-utilised and traffic blocked roads in the village.
I object because the proposal of adding 770 houses to our village (including 550 at Garlicks Arch, 60 at Clockbarn, 40 at Winds Ridge) is disproportionate and places excessive and unachievable demand on local services roads and the infrastructure and character of our village. The addition of 770 new houses to the current population of 1700 properties would be an increase of more than 45%. This cannot be accommodated by the existing infrastructure.

Attached documents:

Comment: MM48 - LPMM18/1126  Respondent: Alison Drennan 10717985  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM9 - LPMM18/1122  Respondent: Alison Drennan 10717985  Agent:

MM9 GREEN BELT POLICY

- I object to the GBC claim that they are protecting the Green Belt as this is highly subjective and exposing any land on the edge of our village for excessive and over-development.
- I object as the approach proposed will create significant opportunities for interested parties to undermine and erode the protections enshrined in the green belt designation and will certainly lead to the continued expansion of the settlement boundaries.
- I object to the wording of policy paragraph (1) as it is devoid of meaning. The paragraph states that “Inappropriate development will not be permitted unless very special circumstances can be demonstrated”. Are we to understand that inappropriate development will be permitted in special circumstances? The paragraph goes on to state that “Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. This is clearly nonsense masquerading as reason and provides no objective criteria for its application.

Attached documents:

Comment: MM27 - LPMM18/707  Respondent: Zareena Linney 10718625  Agent:

MM27, MM41-MM42 and MM48

Traffic implication again as more cars will use my road Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.
Its often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.

Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking i mentioned could become unsafe made worst by the councils plans.

Attached documents:

Comment: MM41 - LPMM18/704  Respondent: Zareena Linney 10718625  Agent:

MM41
The figure of 550 home is too great a number its such a large increase. The numbers and amount will impact badly on infrastructure of village and traffic and impact
Areas of concern for me would be (had already objected long with others and this was ignored)
The impact on the greenbelt land and nature wildlife.
The amount of traffic roads congested and getting unsafe and damaged.
School, medical facilities and shops and infrastructure not wide enough to accommodate.

Attached documents:

Comment: MM41 - LPMM18/708  Respondent: Zareena Linney 10718625  Agent:

MM27, MM41MM42 and MM48
Traffic implication again as more cars will use my road Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.

Its often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.

Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking i mentioned could become unsafe made worst by the councils plans.

Attached documents:

Comment: MM42 - LPMM18/705  Respondent: Zareena Linney 10718625  Agent:
Increase on this industrial site means more lorries which are cracking and damaging our houses down Send Road.

The road congestion from large heavy and often speeding and weight is bad and damaging houses.

The speed is not monitored well. Health and safety risks. Roads are not of a high standard.

Pollution concerns how will this be monitored and controlled?

Nitrogen dioxide levels are too high. could impact on health and nature would need to be checked.

**Attached documents:**

**Comment: MM42 - LPMM18/709  Respondent: Zareena Linney 10718625  Agent:**

Traffic implication again as more cars will use my road Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.

Its often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.

Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking i mentioned could become unsafe made worst by the councils plans.

**Attached documents:**

**Comment: MM48 - LPMM18/710  Respondent: Zareena Linney 10718625  Agent:**

Traffic implication again as more cars will use [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.

Its often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.
Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking i mentioned could become unsafe made worst by the councils plans.

I have been strip of my right to complain about smaller modifications i am also objecting to these, travellers site, clock barn, tannery lane business centre increase which would impact greatly which adding this to the major changes makes a large problem for the local people, green and environmental areas and safety concerns.

I enjoy the nature wildlife and bringing a family up in Send.

Concerns around roads, impact on environment, use damage, health damage and infrastructure weaknesses are causing me major concern, I object to these changes and express my horror and concern that this was just a tokenism consultation and no one views have been listened to from the last lots of objections. Please can you explain this? Why is there more development then before? What the feedback how has this been implemented?

The worry and impact on villagers mental health and physical health means that by being listened too and having informed choice that the people actually have a say in, could be minimised.

**Attached documents:**

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**Comment:** MM9 - LPMM18/706 **Respondent:** Zareena Linney 10718625  **Agent:**

MM9

Concerns about land on the edge of the village which is greenbelt and could be built on damaging environment, wildlife and residents.

Green helps peoples mental health and wellbeing and nature will be eradicated.

**Attached documents:**

---

**Comment:** MM2 - LPMM18/5065 **Respondent:** Stewart Fenton 10719297  **Agent:**

**Local Plan: Strategy and Sites - Main Modifications**

I write this letter in the hope that it will actually be read and considered rather than simply counted and completely ignored like so many thousands of previously lodged objections. The purpose of a public consultation is to listen to the public and take their views into consideration. It is anti-democratic to just pay lip service to such an exercise – we deserve to be listened to.

**POLICY S2**

I object that the housing needs that the plan is based on are vastly overstated. The September data from the Office for National Statistics suggests that 460 houses a year is appropriate to meet the population growth for Guildford Borough. Respected consultancy, Barton Willmore, suggest that an even lower figure of 431 houses a year is enough. Yet the latest plan is based on an excessive figure of 789 houses a year. Where did this figure come from? Its detailed origins are shrouded in mystery.

**Attached documents:**
Comment: MM27 - LPMM18/5070  Respondent: Stewart Fenton 10719297  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

I object to the changes to the A3 junction. They will encourage more traffic from the A3 to divert through Send in order to gain access to and from Woking and beyond. This will cause more traffic problems on Send Barns Lane and Send Road, which are already subject to heavy congestion on a daily basis, particularly during rush hours. This will be in addition to the extra traffic that will result from the increased development in and around the immediate area.

Attached documents:

Comment: MM41 - LPMM18/5067  Respondent: Stewart Fenton 10719297  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The previous plan for 400 homes on this site alone already represented a disproportionate quantity for a village such as Send. I object that this has now been increased to 550 homes of which 450 are to be built in the first five years. This is all on Green Belt land, outside the village boundary, containing ancient woodland. This development will effectively join Send and Ripley and represents urban sprawl and over development, especially when considered alongside the other developments proposed along the A3 corridor. With Ripley school closing, Send school cannot be expected to cope with even more children moving into the area. The existing Medical facilities and other infrastructure will also be unable to accommodate so many more residents.

MM27 MM41 MM42 and MM48 Transport Strategy

I object to the changes to the A3 junction. They will encourage more traffic from the A3 to divert through Send in order to gain access to and from Woking and beyond. This will cause more traffic problems on Send Barns Lane and Send Road, which are already subject to heavy congestion on a daily basis, particularly during rush hours. This will be in addition to the extra traffic that will result from the increased development in and around the immediate area.

Attached documents:

Comment: MM42 - LPMM18/5068  Respondent: Stewart Fenton 10719297  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

I object to this development. There is no proven special circumstances for any new industrial and storage development in the Green Belt. Slyfield Industrial Estate already has spare capacity and The Employment Land Needs Assessment showed a reduction in demand for industrial land. This means that the previous plan for 7000 sq m was not justified and now there is a proposed increase to a minimum of 14,800 sq m.

MM27 MM41 MM42 and MM48 Transport Strategy

I object to the changes to the A3 junction. They will encourage more traffic from the A3 to divert through Send in order to gain access to and from Woking and beyond. This will cause more traffic problems on Send Barns Lane and Send Road, which are already subject to heavy congestion on a daily basis, particularly during rush hours. This will be in addition to the extra traffic that will result from the increased development in and around the immediate area.
Comment: MM44 - LPMM18/5069
Respondent: Stewart Fenton 10719297
Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

I object to this development being added back into the plan after having been removed from the previous draft. There are no special circumstances that justify such a development on Green Belt land. The land is not even within the village boundary. It is adjacent to Send Marsh Green with its heritage buildings and will detract from this unique setting.

Attached documents:

Comment: MM48 - LPMM18/5071
Respondent: Stewart Fenton 10719297
Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

I object to the changes to the A3 junction. They will encourage more traffic from the A3 to divert through Send in order to gain access to and from Woking and beyond. This will cause more traffic problems on Send Barns Lane and Send Road, which are already subject to heavy congestion on a daily basis, particularly during rush hours. This will be in addition to the extra traffic that will result from the increased development in and around the immediate area.

Attached documents:

Comment: MM9 - LPMM18/5066
Respondent: Stewart Fenton 10719297
Agent:

MM9 Green Belt Policy

I object to the major permanent and irreversible damage to the Green Belt. It is our generation’s responsibility to protect the Green Belt for future generations. Green Belt may only be built on if exceptional circumstances have been established and there are none to support this. The policy claims to protect the Green Belt, but in truth it only protects areas of the Green Belt that it chooses to, making exceptions to “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This statement is too vague to afford any real protection. It is also ignoring the fact that most villages are part of the Green Belt. By taking these villages out of Green Belt protection they will become vulnerable to unlimited applications from speculative developers, ultimately resulting in a negative impact to the character of the rural villages of Guildford Borough.

Attached documents:

Comment: MM27 - LPMM18/720
Respondent: Linda Holland 10719553
Agent:

MM27/MM41/MM42 and MM48
The traffic implications for the above have not been adequately addressed and no proper assessment has taken place bearing in mind more traffic increased noise nitrogen pollution delays and gridlock

Attached documents:

**Comment: MM41 - LPMM18/716**  **Respondent: Linda Holland 10719553**  **Agent:**

MM41 I object to MM41 for many reasons but mainly
1 Schools, medical facilities and local roads will not be able to cope
2 More nitrogen dioxide pollution, delays and gridlock

MM41 I object to MM42 for many reasons but mainly
1 This is on top of a 25% increase at Send Business Centre making a much bigger concentration in Send than any other village in Guildford with no proven demand
2 The overall infrastructure will not cope and more nitrogen dioxide pollution

MM27/MM41/MM42 and MM48

The traffic implications for the above have not been adequately addressed and no proper assessment has taken place bearing in mind more traffic increased noise nitrogen pollution delays and gridlock

Attached documents:

**Comment: MM42 - LPMM18/722**  **Respondent: Linda Holland 10719553**  **Agent:**

MM27/MM41/MM42 and MM48

The traffic implications for the above have not been adequately addressed and no proper assessment has taken place bearing in mind more traffic increased noise nitrogen pollution delays and gridlock

Attached documents:

**Comment: MM44 - LPMM18/718**  **Respondent: Linda Holland 10719553**  **Agent:**

MM44 I object to MM44 for many reasons but mainly
1 It is Green Belt site and will contradict policy MM9
2 With other plans this is too much for our infrastructure and more pollution

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM48 - LPMM18/723</th>
<th>Respondent: Linda Holland 10719553</th>
<th>Agent:</th>
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</table>
| MM27/MM41/MM42 and MM48  
The traffic implications for the above have not been adequately addressed and no proper assessment has taken place bearing in mind more traffic increased noise nitrogen pollution delays and gridlock. |

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/719</th>
<th>Respondent: Linda Holland 10719553</th>
<th>Agent:</th>
</tr>
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<td>MM9 I object as this will allow any land on the edge of our villages to be picked off for development, an open invitation to developers and speculators at the expense of residents.</td>
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Traffic implications for Send Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. G.B.C offer fine words but NO proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased Noise, Nitrogen pollution, delays and gridlock. |

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| Re Guildford Local Plan: Strategy and Sites - Main Modifications 2018  
I object to the recent proposed plan by Guildford Borough Council for MM41 Land at Garlicks Arch Send Marsh Policy A43. The increase from 400 houses to 550 is excessive. It is green belt containing ancient woodland which will join Send and Ripley and constitute over development. The site is subject to flooding and contaminated with lead shot. School and medical facilities will be at breaking point. There will be at least 850 extra cars that will block up the adjacent roads. Toxic pollution and noise pollution will be detrimental to the current population and even more so to future generations. |

**Attached documents:**
I object to G.B.C MM27, MM41, MM42 AND MM48 TRANSPORT STRATEGY

Traffic implications for Send Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. G.B.C offer fine words but NO proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased Noise, Nitrogen pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/2214  Respondent: Y Beraud 10721089  Agent:

I object to the recent proposed plan for MM42 Land at Burnt Common London Road Send Policy A58, since being deleted from the 2014 plan this has been increased twice doubling the area. IT IS BY FAR THE LARGEST NEW INDUSTRIAL ALLOCATION IN ANY VILLAGE IN THE BOROUGH. There is no need to put new industrial sites in the Green Belt when Slyfield has unused capacity. There are No special circumstances so it contradicts MM9. The employment land needs Assessment showed a reduction in demand for industrial land. This, on top of a 25% increase at Send Business Centre is making a much bigger concentration in Send than any other village with No proven demand. NITROGEN DIOXIDE levels are already dangerously high. Surrounding roads will continue to be gridlocked, as is the current situation.

Attached documents:

Comment: MM44 - LPMM18/2215  Respondent: Y Beraud 10721089  Agent:

I object to plan MM44 Land at Alderton's Farm Send Marsh Road policy A63. This was deleted from an earlier draft because of all the objections and not re-instated until the Public examination in July 2018. It is a Green Belt site with No special circumstances so it also contradicts MM9. It will detract from the Heritage Buildings on Send Marsh Green, and additional traffic will increase the pressure on Send Crossroads, increasing further Toxic Pollution. With Garlick's Arch 550 house, Clockbarn 60 houses, and Winds Ridge 40 houses this adds 770 houses to the current 1,700 in Send. This is an increase of 45%, far too much for our infrastructure.

Attached documents:
Comment: MM48 - LPMM18/2220  Respondent: Y Beraud 10721089  Agent:

I object to G.B.C MM27, MM41, MM42 AND MM48 TRANSPORT STRATEGY

Traffic implications for Send Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. G.B.C offer fine words but NO proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased Noise, Nitrogen pollution, delays and gridlock.

It would be a complete dereliction of duty by the council not to ensure clean air, light and recreational space for the residents of the borough. Further concrete development on this scale, toxic traffic fumes from thousands of more vehicles and removal of green space is and will reduce quality of life for all in the borough as it becomes an urban sprawl likened to towns such as Basingstoke and Crawley.

Attached documents:

Comment: MM9 - LPMM18/2216  Respondent: Y Beraud 10721089  Agent:

I object to G.B.C MM9 Green Belt Policy the (modifications) that claim to protect the Green Belt except in very special circumstances G.B.C can make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents.

Attached documents:

Comment: MM27 - LPMM18/1147  Respondent: L Beraud 10721121  Agent:

I object to G.B.C. MM27,MM41,MM42 AND MM48 TRANSPORT STRATEGY

Traffic implications for Send Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. G.B.C offer fine words but NO proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased Noise, Nitrogen pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/1142  Respondent: L Beraud 10721121  Agent:

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and medical facilities will be at breaking point. There will be at least 850 extra cars that will block up the adjacent roads also an increase in Toxic pollution and Noise Pollution.

Attached documents:

**Comment:** MM41 - LPMM18/1148  **Respondent:** L Beraud 10721121  **Agent:**

I object to G.B.C. MM27,MM41,MM42 AND MM48 TRANSPORT STRATEGY

Traffic implications for Send Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. G.B.C offer fine words but NO proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased Noise, Nitrogen pollution, delays and gridlock.

Attached documents:

**Comment:** MM42 - LPMM18/1143  **Respondent:** L Beraud 10721121  **Agent:**

I object to the recent proposed plan for MM42 Land at Burnt Common London Road Send Policy A58. Since being deleted from the 2014 plan this has been increased twice doubling the area. IT IS BY FAR THE LARGEST NEW INDUSTRIAL ALLOCATION IN ANY VILLAGE IN THE BOROUGH. There is no need to put new industrial sites in the Green Belt when Slyfield has unused capacity. There are No special circumstances so it contradicts MM9. The employment land needs Assessment showed a reduction in demand for industrial land. This, on top of a 25% increase at Send Business Centre is making a much bigger concentration in Send than any other village with No proven demand. NITROGEN DIXOIDE levels are already dangerously high. Surrounding roads will continue to be gridlocked, as is the current situation.

Attached documents:

**Comment:** MM44 - LPMM18/1149  **Respondent:** L Beraud 10721121  **Agent:**

I object to G.B.C. MM27,MM41,MM42 AND MM48 TRANSPORT STRATEGY

Traffic implications for Send Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. G.B.C offer fine words but NO proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased Noise, Nitrogen pollution, delays and gridlock.

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Attached documents:

Comment: MM48 - LPMM18/1150 Respondent: L Beraud 10721121  Agent:

I object to G.B.C. MM27,MM41,MM42 AND MM48 TRANSPORT STRATEGY

Traffic impliactions for Send Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. G.B.C offer fine words but NO proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased Noise, Nitrogen pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/1146 Respondent: L Beraud 10721121  Agent:

I object to G.B.C. MM9 Green Belt Policy the (Modifications) that claim to protect the Green Belt except in very special circumstances G.B.C. can make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents.

Attached documents:

Comment: MM3 - LPMM18/5604 Respondent: David French 10721473  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3.Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

**Comment:** MM31 - LPMM18/5614  **Respondent:** David French 10721473  **Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

**Comment:** MM9 - LPMM18/5606  **Respondent:** David French 10721473  **Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development

**Attached documents:**

**Comment:** MM2 - LPMM18/989  **Respondent:** Stephen Niblett 10721537  **Agent:**

I would request that you supply details that show you are being fair to all village councils in the Guildford Borough in a form that shows existing number of houses in that area and the number of new applications (as a total number of houses) and express this as a percentage this would show that the GBC are being fair across the whole county or NOT as the case will show

Also at the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year.

Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431.

September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year.

Both these totals are hugely less than the total assumed by the Inspector.
Perhaps someone at the Council would like to explain to me why we have such a massive difference to developments in Send.

I am referring to POLICY S2. so a reply would be appreciated

A very concerned resident

**Attached documents:**

---

**Comment:** MM41 - LPMM18/986  **Respondent:** Stephen Niblett 10721537  **Agent:**

I would like to formally object to the following Planning Applications

**MM41 Land at Garlicks Arch**  Policy A43..... the 7000 objections to the previous 400 houses have been ignored and now the proposal is 550 this is unacceptable

This is Green Belt that contains ancient woodland and also if the existing school and medical facilities are only just sufficient to the existing local needs how will they cope with the extra residents

Can you explain how with this application it will not constitute over development by joining Ripley and Send

**Attached documents:**

---

**Comment:** MM42 - LPMM18/987  **Respondent:** Stephen Niblett 10721537  **Agent:**

**MM42 Land at Burnt Common**  Policy A58 This was I believe deleted form the 2014 plan yet now it has been increased twice and therfore doubling the area please explain how can this be allowed

I would like to be informed as to why unused capacity of the industrial land at Slyfield is not being used first before this application in Send

**Attached documents:**

---

**Comment:** MM44 - LPMM18/988  **Respondent:** Stephen Niblett 10721537  **Agent:**

**MM44 Aldertons Farm**  A63  As this is Green Belt land it contradicts policy MM42 it therefore should be withdrawn. The existing roads would not be able to cope with the additional traffic

**Attached documents:**

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**Comment:** MM41 - LPMM18/1335  **Respondent:** Mrs Ashley Gurdon 10722177  **Agent:**
With the current works being carried out by Affinity it has been clear that there is already a large amount of traffic that passes down the B2215 and through Ripley. How is the area meant to cope with another 700 plus cars? Also the area is Green Belt with woodland, again is that not something to be proud of and protected? Not just ignored when it suits the Planners and Developers. The Village Medical Centre is already impossibly busy and over subscribed, will another surgery be opened, and will other schools be provided for the extra homes that are planning to be built?

Attached documents:

**Comment: MM41 - LPMM18/2050  Respondent: Judith Pound 10723553  Agent:**

I am writing to object to the latest version of the Local Plan which seems to be penalising Send with far more than its share of development, with significant volumes of housing targeted for Garlick's Arch (MM41), and Alderton's Farm (MM44). A total of 670 new houses is a staggering number for a village the size of Send.

I have lived in the area for nearly 30 years and in that time seen a vast build up in traffic levels and do not see how the local road network can sustain the resulting increase. Neither can increased traffic levels be introduced without an impact to nearby bottle necks. These include Ripley, Old Woking and, of course, Guildford itself, which cannot handle the amount of traffic it faces already, and, in the case of any incident, quickly becomes gridlocked. I am particularly concerned at the moment of time that the A3 Southbound is stationary or slow moving, particularly given the need for ambulances to access The Royal Surrey County Hospital. I do not believe either that local schools or medical facilities would be able to cope with the resulting influx of numbers.

Attached documents:

**Comment: MM42 - LPMM18/2054  Respondent: Judith Pound 10723553  Agent:**

Land at Burnt Common Road MM42 - I am marginally more sympathetic to increased industrial land if it genuinely creates local employment so that the village doesn't become purely a dormitory for, in particular, London, but only if such development is necessary. As this again uses Green Belt land, I do not see where the necessity comes in, when there is unused capacity at the existing Slyfield site. Such a proposal would surely therefore breach MM9.

Attached documents:

**Comment: MM44 - LPMM18/2051  Respondent: Judith Pound 10723553  Agent:**

I am writing to object to the latest version of the Local Plan which seems to be penalising Send with far more than its share of development, with significant volumes of housing targeted for Garlick's Arch (MM41), and Alderton's Farm (MM44). A total of 670 new houses is a staggering number for a village the size of Send.

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ambulances to access The Royal Surrey County Hospital. I do not believe either that local schools or medical facilities would be able to cope with the resulting influx of numbers.

Attached documents:

**Comment: MM9 - LPMM18/2052  Respondent: Judith Pound 10723553  Agent:**

Regarding policy MM9, I object most strongly to any attack on the Green Belt. The supposed pressure on land only shows how necessary Green Belt land is if we are not to live in one huge urban sprawl as bigger towns such as Guildford and Woking stretch out. The extent to which we need extra housing is itself open to question, particularly in a post-Brexit world. I am also sure that more can be done to free up housing stock in other ways. Speeding up the process of probate for example would free up many properties left empty for months. Allowing change of use of former retail properties, enabling them to be used for living accommodation would also have an impact. Tearing up Green Belt land is simply wrong and disguising this by adopting such policies as allowing limited infilling at the edges of settlements is disingenuous and will allow for ever increasing raids on the Green Belt.

Attached documents:

**Comment: MM27 - LPMM18/389  Respondent: Hilary Sewter 10724897  Agent:**

I object to MM27 MM41 MM42 and MM48 Transport Strategy because:-

Currently, heavy traffic from the A3 already heads to Woking through Send and even small roadworks cause major traffic jams, particularly at rush hour. This will be exacerbated when the proposed changes to the A3 improvements take place. With the extra industrial and housing developments in the areas mentioned above, Send will regularly become gridlocked.

Attached documents:

**Comment: MM41 - LPMM18/385  Respondent: Hilary Sewter 10724897  Agent:**

I object to MM41 Land at Garlicks Arch, Send Marsh, Policy A43 because:-

- An increase from 400 to 550 homes is excessive.
- There were 7,000 objections to the previous LOWER number, which have been ignored.
- Green Belt should be honoured. It is being ignored or the rules 'bent'.
- Overdevelopment will result in an increase in demand for water which is not viable and cannot be sustained.
- The proposed area is a necessary and essential flood plain.
- The increase in vehicles will block roads which already subject to becoming gridlocked.
- There simply are not enough school places and medical practices to support additional population.

Attached documents:
I object to MM27 MM41 MM42 and MM48 Transport Strategy because:-

Currently, heavy traffic from the A3 already heads to Woking through Send and even small roadworks cause major traffic jams, particularly at rush hour. This will be exacerbated when the proposed changes to the A3 improvements take place. With the extra industrial and housing developments in the areas mentioned above, Send will regularly become gridlocked.

Attached documents:

---

I object to MM42 Land at Burnt Common, London Road, Send, Policy A58 because:-

- This development has been increased twice and is now DOUBLE the original 2014 Plan. That plan was deleted.
- No other village in the Borough comes close to this amount of new industrial allocation.
- Slyfield has unused capacity for this type of development.
- This policy contravenes Green Belt legislation MM9.
- In the current political climate the Employment Lands Need Assessment indicated a reduction in demand for industrial land. This, together with the 25% increase in Send Business Centre, means an unreasonably large amount of industrial land in Send. Bigger than in any other village.
- The type of vehicles that would serve these industrial sites are unsuited to the existing Roads, some of which are country lanes with no passing places.

Attached documents:

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I object to MM42 Land at Alderton's Farm, Send Marsh Road, Policy A63 because:-

- Previous objections meant this proposal was deleted from an earlier draft. It was only Re-inserted in time for the public examination in July.
- This is Green Belt contradicting Policy MM9.
- The roads in and out of this area, especially Send Cross Roads, already jam up readily.
The proposed additional homes at Garlick's Arch, Clockbarn and Winds Ridge total 650. Together with these proposed additional 120 homes, that is 770 more homes in this small village. NO WAY CAN OUR EXISTING INFRASTRUCTURE SUSTAIN SUCH AN INCREASE.

**Comment:** MM48 - LPMM18/392  **Respondent:** Hilary Sewter 10724897  **Agent:**

I object to MM27 MM41 MM42 and MM48 Transport Strategy because:-

Currently, heavy traffic from the A3 already heads to Woking through Send and even small roadworks cause major traffic jams, particularly at rush hour. This will be exacerbated when the proposed changes to the A3 improvements take place. With the extra industrial and housing developments in the areas mentioned above, Send will regularly become gridlocked.

**Comment:** MM9 - LPMM18/388  **Respondent:** Hilary Sewter 10724897  **Agent:**

I object to the "Modifications" to the interpretation of the Green Belt legislation MM9 because:-

- Guildford Borough Council need to reinforce the Green Belt legislation to protect our village from over-development at the expense of existing home owners and their residential needs.

**Comment:** MM41 - LPMM18/1152  **Respondent:** Patricia Ray 10728481  **Agent:**

To all concerned with Local Plan

RE: Guildford Local Plan: Strategy and Sites - Main Modifications 2018

I write to inform you of my objections as follows:

MM41 - Policy Number A43 Land at Garlicks Arch, Send Marsh.

1. The area is GREEN BELT with woodland, part of which is ANCIENT WOODLAND.
2. The number of houses scheduled to be built is excessive for the area.
3. The extra vehicles on the road as a result of increased housing will produce more polluting exhaust fumes.
4. Schools and medical facilities available now will be unable to cope with the extra demand.
5. Fewer trees, if any left at all, will increase the risk of flooding in the area. Laying tarmac and concrete will also cause rain water run-off, again increasing the risk of flooding.
I am writing to OBJECT to the local plan Main Modifications as outlined below:

I OBJECT to MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
- It is Green Belt containing ancient woodland
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

I OBJECT to MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

I OBJECT to MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous
Comment: MM42 - LPMM18/1995  Respondent: Gill Love 10728993  Agent:

I OBJECT to MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/1992  Respondent: Gill Love 10728993  Agent:

I OBJECT to MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
• It is a Green Belt site with no special circumstances so it also contradicts policy MM9
• It will detract from the heritage buildings at Send Marsh Green
• The additional traffic will increase pressure on the Send Crossroads
• With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/1996  Respondent: Gill Love 10728993  Agent:

I OBJECT to MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/1993  Respondent: Gill Love 10728993  Agent:

I OBJECT to MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site
should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: Other comments - LPMM18/1997  Respondent: Gill Love 10728993  Agent:

I OBJECT to Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM2 - LPMM18/5809  Respondent: K. Croxford 10729185  Agent:

The Local Plan attempts to address the issue of transport, but is inaccurate in several places (eg ‘on most local roads in urban areas and in villages, there is at least one footway, usually two’)

Other than the main routes out of the village (which are already under pressure), most roads are in fact lanes, often with no footways at all (eg Polesden Lane, parts of Vicarage Lane & Potters Lane)

Many other routes are lanes which cannot accommodate free-moving two-way traffic (Newark Lane, Burnt Common Lane, Rose Lane, Send Hill, Woodhill, Potters Lane, Church Lane, Vicarage Lane)

The existing bends around Potters Lane / Send Hill are already treacherous, with several blind corners and narrow apertures – these need attention already, not more traffic volume!

Overall, any further developments will create significant traffic, pollution, delays and backlogs, putting more pressure on people using ‘back roads’ (ie lanes) and clogging up the villages

The modifications are simply too much for the villages of Send and Burnt common, that already suffer from increased traffic and congestion / pollution

Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’

ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan. Send residents have repeatedly been voicing their concerns in previous feedback, but these have been largely ignored

It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking

Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising.

A loss of more countryside/Green Belt/nature/openness would exacerbate this
Abandoning the new A3 slip-road (policy A43a) would save a great deal of money which could be better spent on other services for existing residents, who already pay substantial levels of Council Tax (such measures could include traffic-calming, road repairs and noise reduction).

Local residents and Parish Councils feel they are now being ‘punished’ for simply voicing their concerns over the years – concerns which ONS and other boroughs seem to be taking heed of – except, it would seem, Guildford Borough Council.

Attached documents:

**Comment:** MM27 - LPMM18/4673  **Respondent:** K. Croxford 10729185  **Agent:**

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

Regarding road traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure.

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/marina in Tannery Lane), the main road through Send has struggled.

Having temporary lights has become a regular feature, and continues even today (4-way lights at the A247 junction to Old Woking, and along Portsmouth Road into Ripley).

Send is a VILLAGE, not a town – and the main road through Send regular gets clogged with traffic, and backs up most mornings and evenings – in both directions.

The Local Plan attempts to address the issue of transport, but is inaccurate in several places (eg ‘on most local roads in urban areas and in villages, there is at least one footway, usually two’).

Other than the main routes out of the village (which are already under pressure), most roads are in fact lanes, often with no footways at all (eg Polesden Lane, parts of Vicarage Lane & Potters Lane).

Many other routes are lanes which cannot accommodate free-moving two-way traffic (Newark Lane, Burnt Common Lane, Rose Lane, Send Hill, Woodhill, Potters Lane, Church Lane, Vicarage Lane).

The existing bends around Potters Lane / Send Hill are already treacherous, with several blind corners and narrow apertures – these need attention already, not more traffic volume!

Overall, any further developments will create significant traffic, pollution, delays and backlogs, putting more pressure on people using ‘back roads’ (ie lanes) and clogging up the villages.

The modifications are simply too much for the villages of Send and Burnt common, that already suffer from increased traffic and congestion / pollution.

Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’.

ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan. Send residents have repeatedly been voicing their concerns in previous feedback, but these have been largely ignored.

It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking.

Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising.
A loss of more countryside/Green Belt/nature/openness would exacerbate this

Abandoning the new A3 slip-road (policy A43a) would save a great deal of money which could be better spent on other services for existing residents, who already pay substantial levels of Council Tax (such measures could include traffic-calming, road repairs and noise reduction)

Local residents and Parish Councils feel they are now being ‘punished’ for simply voicing their concerns over the years – concerns which ONS and other boroughs seem to be taking heed of – except, it would seem, Guildford Borough Council

Attached documents:

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**Comment:** MM41 - LPMM18/4590  **Respondent:** K. Croxford 10729185  **Agent:**

- **MM41 – Garlicks Arch (policy A43)**

  The scale of proposed development is too excessive

  Latest ONS estimates have down-graded the level of new homes needed in the Guildford borough, so this proposal cannot be justified

  The land itself is GREEN BELT, with no apparent ‘special conditions’ to exempt it

  The land contains ancient woodland, which should be preserved.

  A key purpose of retaining GREEN BELT is to prevent urban sprawl, and development here would compromise this,

  The site itself has been subject to flooding in the past, and this should render the site unsuitable for development

  The extra traffic generated would be unacceptable for existing infrastructure,

  Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further

  Having closed the primary school in Ripley, there is no tangible capacity for schooling

  Send Villages Medical Centre, which seems to be already running at full capacity

  **I OBJECT to this development and the proposed modification**

  Attached documents:

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**Comment:** MM41 - LPMM18/4671  **Respondent:** K. Croxford 10729185  **Agent:**

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

Regarding road traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/marina in Tannery Lane), the main road through Send has struggled
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Other than the main routes out of the village (which are already under pressure), most roads are in fact lanes, often with no footways at all (eg Polesden Lane, parts of Vicarage Lane & Potters Lane)

Many other routes are lanes which cannot accommodate free-moving two-way traffic (Newark Lane, Burnt Common Lane, Rose Lane, Send Hill, Woodhill, Potters Lane, Church Lane, Vicarage Lane)

The existing bends around Potters Lane / Send Hill are already treacherous, with several blind corners and narrow apertures – these need attention already, not more traffic volume!

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Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’

ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan. Send residents have repeatedly been voicing their concerns in previous feedback, but these have been largely ignored

It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking

Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising.

A loss of more countryside/Green Belt/nature/openness would exacerbate this

Abandoning the new A3 slip-road (policy A43a) would save a great deal of money which could be better spent on other services for existing residents, who already pay substantial levels of Council Tax (such measures could include traffic-calming, road repairs and noise reduction)

Local residents and Parish Councils feel they are now being ‘punished’ for simply voicing their concerns over the years – concerns which ONS and other boroughs seem to be taking heed of – except, it would seem, Guildford Borough Council

Attached documents:

Comment: MM42 - LPMM18/4596  Respondent: K. Croxford 10729185  Agent:

- MM42 – Burnt Common (policy A58)

I do not agree with the labelling of this site as being ‘strategically’ important

It is GREEN BELT land, and I oppose the re-drawing of GREEN BELT lines simply to suit this proposal
There are no ‘special circumstances’ to warrant insetting this site from the GREEN BELT.

Other sites in the borough have unused capacity

Other ‘brownfield sites’ should firstly be fully considered and identified

We have already witnessed commercial development (Send Business Centre, Vision Engineering) in the village

There is no proven demand for extra industrial land in the village

The road infrastructure is unsuitable, as the road accessing the site is in disrepair. Vehicles leaving the site would have to cross onto the north-bound A3 slip road, which has been the scene of many accidents in the recent past, some fatal.

The likely increase in traffic and noise would be inappropriate for the site

Levels of pollution (such as nitrogen dioxide) are already increasing

The proposal to create a 4-way junction off the nearby A3 (policy A43a) is a waste of money and would only increase traffic noise and pollution through the locality

I OBJECT to this development and the proposed modification

Attached documents:

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Comment: MM42 - LPMM18/4675  Respondent: K. Croxford 10729185  Agent:

MM27 / MM41 / MM42 / MM48 – Transport Strategy

Regarding road traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure

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The existing bends around Potters Lane / Send Hill are already treacherous, with several blind corners and narrow apertures – these need attention already, not more traffic volume!
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Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’

ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan. Send residents have repeatedly been voicing their concerns in previous feedback, but these have been largely ignored

It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking

Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising.

A loss of more countryside/Green Belt/nature/openness would exacerbate this

Abandoning the new A3 slip-road (policy A43a) would save a great deal of money which could be better spent on other services for existing residents, who already pay substantial levels of Council Tax (such measures could include traffic-calming, road repairs and noise reduction)

Local residents and Parish Councils feel they are now being ‘punished’ for simply voicing their concerns over the years – concerns which ONS and other boroughs seem to be taking heed of – except, it would seem, Guildford Borough Council

Attached documents:

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**Comment:** MM44 - LPMM18/4598  **Respondent:** K. Croxford 10729185  **Agent:**

- **MM44 – Aldertons Farm (policy A63)**

This site is GREEN BELT land

No ‘special circumstances’ should apply, and the land has been subject to flooding and does not drain well

The likely increase in traffic would be inappropriate for a site bordering on residential areas

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further

The knock-on effect, in addition to other sites, would be excessive for our village, given the revised (ie lower) ONS forecasts for housing needs

*I OBJECT to this development and the proposed modification*

Attached documents:

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**Comment:** MM48 - LPMM18/4670  **Respondent:** K. Croxford 10729185  **Agent:**

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Regarding road traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/marina in Tannery Lane), the main road through Send has struggled

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Attached documents:
Comment: MM9 - LPMM18/4604  Respondent: K. Croxford 10729185  Agent:

**MM9 – Green Belt**

None of the proposed sites seem to carry any tangible ‘special circumstances’ to warrant insetting from the Green Belt

The proposed ‘new Woodham town’ was heavily criticised, and recent planning documents suggest the site will be safeguarded from development

(The main reasons are to prevent urban sprawl and an encroachment into the countryside, a loss of open space, and limited scope to mitigate traffic)

For the same reasons, the modifications proposed for Send should be similarly dismissed

Therefore I OBJECT to the re-drawing of the GREEN BELT boundaries in the above proposals, and believe other boroughs have set a precedent in this regard

Attached documents:

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Comment: Other comments - LPMM18/4587  Respondent: K. Croxford 10729185  Agent:

I am writing in regard to the latest modifications to the Local Plan, which seems to overlook many thousands of previous objections

Send seems to have been targeted for a much greater scale of development

I will respond to each modification as follows:-

Attached documents:

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Comment: MM27 - LPMM18/3827  Respondent: Richard Croxford 10729281  Agent:

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/marina in Tannery Lane), the main road through Send has struggled

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Overall, the slightest developments can create significant traffic, pollution, delays and backlogs, putting more pressure on people using ‘back roads’ (ie lanes) and clogging up the villages

In summary, the modifications are simply too much for the village of Send and Burnt common, that already suffer from increased traffic and congestion / pollution

- Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’

- ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan

- Send residents have repeatedly been voicing their concerns in previous feedback, but these have been largely ignored

- It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking

- Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising. A loss of more countryside/Green Belt would exacerbate this

- Abandoning the new A3 slip-road (policy A43a) would save money which could be better spent on other services for existing residents, who pay high levels of Council Tax

(such measures could include traffic-calming, road repairs and noise reduction)

Many residents feel they are now being ‘punished’ for simply voicing their concerns over the years

The Wisley airfield could perhaps be re-considered for some light industrial development, if demand can be proven, given its greater proximity to the M25/A3

It is also better suited to having an appropriate traveller pitch allocation (instead of Winds Rush A44 – practically opposite the cemetery!!) as part of a mixed development

Attached documents:

**Comment:** MM41 - LPMM18/3817 **Respondent:** Richard Croxford 10729281 **Agent:**

**MM41 – Garlicks Arch (policy A43)**

The scale of proposed development is massively excessive
Recent ONS estimates have down-graded the level of new homes needed in the Guildford borough, so this proposal cannot be rationally justified.

The land itself is GREEN BELT, and there are no apparent ‘special conditions’ to exempt it.

The land contains ancient woodland, which should be preserved. Many trees carry TPOs (preservation orders).

One key purpose of retaining GREEN BELT is to prevent urban sprawl, and development here would compromise this, essentially linking Ripley to Send/Burnt Common.

The site itself has been subject to flooding in the past, and this should render the site unsuitable for development.

The extra traffic generated would be unacceptable for existing infrastructure, which is already bursting at the seams.

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further.

Having closed the primary school in Ripley, there is no tangible capacity for schooling.

It is already far too difficult to get appointments at the Send Villages Medical Centre, which seems to be already running at full capacity.

Therefore I OBJECT to this development and the proposed modification.

Attached documents:

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Comment: MM41 - LPMM18/3828  Respondent: Richard Croxford 10729281  Agent:

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough.

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure.

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/marina in Tannery Lane), the main road through Send has struggled.

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In summary, the modifications are simply too much for the village of Send and Burnt common, that already suffer from increased traffic and congestion / pollution

- Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’

- ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan

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- It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking

- Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising. A loss of more countryside/Green Belt would exacerbate this

- Abandoning the new A3 slip-road (policy A43a) would save money which could be better spent on other services for existing residents, who pay high levels of Council Tax

(such measures could include traffic-calming, road repairs and noise reduction)

Many residents feel they are now being ‘punished’ for simply voicing their concerns over the years

The Wisley airfield could perhaps be re-considered for some light industrial development, if demand can be proven, given its greater proximity to the M25/A3

It is also better suited to having an appropriate traveller pitch allocation (instead of Winds Rush A44 – practically opposite the cemetery!!) as part of a mixed development

Attached documents:

**Comment: MM42 - LPMM18/3822 Respondent: Richard Croxford 10729281 Agent:**

**MM42 – Burnt Common (policy A58)**

This was originally proposed to be a modest development, was then increased (to a minimum figure), and has now expanded hugely to a minimum of 14,800 square feet

I do not agree with the labelling of this site as being ‘strategically’ important

It is GREEN BELT land, and I oppose the re-drawing of GREEN BELT lines simply to suit this proposal

There are no apparent ‘special circumstances’ to warrant insetting this site from the GREEN BELT

874 of 2554
Other sites in the borough have unused capacity, and other ‘brownfield sites’ should firstly be fully considered and identified.

We have already witnessed increased commercial development (Send Business Centre, Vision Engineering) in the village.

There is no apparent or proven demand for extra industrial land in the village.

The road infrastructure is unsuitable, as the road accessing the site is in disrepair (cracks regularly) and cannot cope with existing traffic, let alone more.

Vehicles leaving the site would have to cross onto the north-bound A3 slip road, which is fast-moving and has been the scene of many accidents in the recent past, some fatal.

The likely increase in traffic and noise would be inappropriate for a site bordering on residential areas on the roundabout.

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further.

The proposal to create a 4-way junction off the nearby A3 (policy A43a) is a waste of money and would only increase traffic noise and pollution through the villages.

Therefore I OBJECT to this development and the proposed modification.

**Attached documents:**

**Comment:** MM42 - LPMM18/3829  **Respondent:** Richard Croxford 10729281  **Agent:**

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough.

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure.

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Many residents feel they are now being ‘punished’ for simply voicing their concerns over the years

The Wisley airfield could perhaps be re-considered for some light industrial development, if demand can be proven, given its greater proximity to the M25/A3

It is also better suited to having an appropriate traveller pitch allocation (instead of Winds Rush A44 – practically opposite the cemetery!!) as part of a mixed development

Attached documents:

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**Comment:** MM44 - LPMM18/3825  **Respondent:** Richard Croxford 10729281  **Agent:**

**MM44 – Aldertons Farm (policy A63)**

This site proposes development for building around 120 homes, but it is GREEN BELT land

No ‘special circumstances’ should apply, especially as the land has been subject to flooding and does not drain well

The likely increase in traffic would be inappropriate for a site bordering on residential areas

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further

The knock-on effect, in addition to other sites, would be excessive for our village, given the revised (ie lower) ONS forecasts for housing needs

Therefore I OBJECT to this development and the proposed modification
The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough.

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure.

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/ marina in Tannery Lane), the main road through Send has struggled.

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- It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking.

- Noise levels are already uncomfortable, and it has been reported that nitrogen dioxide levels are rising. A loss of more countryside/Green Belt would exacerbate this.
-Abandoning the new A3 slip-road (policy A43a) would save money which could be better spent on other services for existing residents, who pay high levels of Council Tax

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Many residents feel they are now being ‘punished’ for simply voicing their concerns over the years

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It is also better suited to having an appropriate traveller pitch allocation (instead of Winds Rush A44 – practically opposite the cemetery!!) as part of a mixed development

Attached documents:

Comment: MM9 - LPMM18/3826  Respondent: Richard Croxford 10729281  Agent:

MM9 – Green Belt

None of the proposed sites seem to carry any tangible ‘special circumstances’ to warrant insetting from the Green Belt

The concern of many villagers is that – once a little development is permitted – it can establish a basic footprint for greater density of development in future

Woking Borough Council has acted to preserve its open spaces and concentrate development in the town centre

For example, the proposed ‘new Woodham town’ was heavily criticised, and recent planning documents suggest the site will be safe-guarded from development

(The main reasons are to prevent urban sprawl and an encroachment into the countryside, a loss of open space, and limited scope to mitigate traffic)

For the same reasons, the modifications proposed for Send should be similarly dismissed

Therefore I OBJECT to the re-drawing of the GREEN BELT boundaries in the above proposals, and believe other boroughs have set a precedent in this

Attached documents:

Comment: MM14 - LPMM18/6066  Respondent: Julia Osborn 10729537  Agent:

MM42/ MM14

Furthermore, in addition to an increase in dwellings, the proposed modifications will lead to a substantial increase in industrial development within the Parish of Send.

Attached documents:
**Comment: MM2 - LPMM18/6069  Respondent: Julia Osborn 10729537  Agent:**

Way Ahead

I strongly reiterate the point I made at the Examination that at the very least a cap needs to be inserted on the overall amount of development in each village. Moreover, to ensure sustainable development in accordance with para 17 of the NPPF this should be a percentage that is proportionate to the size of the existing settlement.

**Attached documents:**

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**Comment: MM41 - LPMM18/6064  Respondent: Julia Osborn 10729537  Agent:**

I presented at the Examination in July 2018 in my personal capacity as a resident on invitation/request of Save Send Action Group (SSAG). I am also a Parish Councillor of Send Parish Council. Views expressed are my own.

I am writing to OBJECT to the proposed main modifications for the Parish of Send, Send Marsh and Burnt Common on the grounds that the proposals do not constitute ‘sustainable development’ for the Parish and on these grounds:

I Object to MM41 Land at Garlicks Arch, Policy A43.

I Object to MM42 Land at Burnt Common, Policy A 58.

I Object to MM44 Land at Alderton’s Farm, Policy A63.

I Object to MM9 Policy P2 GreenBelt.

I Object to MM14/ MM15, Policy E2.

**Background**

My representation to the Examination in July 2018 centred on soundness of the plan in terms of its ‘sustainability’ and that in accordance with paragraph 17 of the NPPF a core planning principle is to focus development in locations which are or can be made sustainable.

I made a number of points in relation to how the evidence base of the submission plan does not support Send being a sustainable location for development.

In particular, and to contextualise I summarise the following points:-

1) Anomalies within the Settlement Hierarchy Document (2014) have resulted in Send, Send Marsh and Burnt Common being classified a ‘large village’. For example the ‘fuel Garage’ at Burnt Common has been used as a justification to classify Send Marsh and Burnt Common as a ‘large’ village. Whereas the settlement would otherwise have been ranked as a Medium village in terms of the sustainability rankings of the document.

2) The sustainability ‘scorings’/ functional rankings in the Settlement Hierarchy Document (2014) are too simplistic and therefore over inflates the sustainability of Send. I gave the example of public transport and bus service provision and how Send Marsh and Burnt Common at been given a score of 4, (the highest ranking) and that the Urban area of Guildford was given the same score of 4.

3) Even if Send was a large village by the documents own definition “large villages are unsuitable for substantial growth (but capable of accommodating an extension”).
4) In response to the Inspectors initial Q4, the Council have not provided an upper limit on the amount development for each village; and for Send village this could result in up to or in excess of 1000 dwellings being built in/around Send (if no constraint is applied to prevent sites from previous versions of the plan being reinstated).

Main Modifications

All of the points above raise fundamental questions around the “sustainability” of Send for the level of development proposed and at the time of my speaking at the Examination Hearings in July 2018, the level of development proposed for the Parish was:-

400 dwellings at Galicks Arch (site A43)
60 dwellings at Clockbarn Nursery (A42)
40 dwellings Land at Winds Ridge and Send Hill (A44).

A total of 500 dwellings to be built in/around Send, Send Marsh and Burnt Common.

MM41 / MM44

The Main Modifications now propose to increase the number of dwellings.

MM41 will increase by 150 dwellings at Garlicks Arch (policy A43) from 400 to 550 dwellings and MM44 has reintroduce a site (included in 2014 edition of the Plan) in Send Marsh, called Aldertons Farm, to deliver a further 120 dwellings (policy A63). This brings the Total number of dwellings proposed for Send, Send Marsh and Burnt Common now to a total of 770 Dwellings.

As noted by Tibbalds consultants in their submission to this consultation on behalf of Send Parish Council, the Parish of Send will account for 56% of proposed supply in villages (based on table MM2).

This level of development is not supported by the evidence base of the plan. The sequential hierarchy within the sustainability appraisal (SA) places Send, Send Marsh and Burnt Common at the bottom of the hierarchy at Tier 10. According to the evidence base of the Plan Tier 10 is considered the least sustainable location for development.

Attached documents:
I also am further concerned that further additional sites outside the settlement boundary and within the Green Belt could be approved leading to further overdevelopment and pressures on the infrastructure.

MM9 (policy P2 Green Belt) c ii, states “limited infilling maybe appropriate outside the inset settlement boundary.. If it can be demonstrated the site should be considered within the village”.

In the past month alone, I am aware that two further sites in Send are being marketed by developers and a potential rural exception site looks to be under consideration.

I object to MM1
The proposed increase in the required number of dwellings is excessive and unsubstantiated. The plan fails to take account of the Borough's need to preserve its high proportion of designated Green Belt land and historic woodland.

The proposed housing increase will have a massive negative impact on the villages of Send and Ripley be devastating for the residents of Send Marsh and Burnt Common.

I object to MM12
The change in wording in policy para's 1, 2(c), 3(d), and 4. The wording 'The measures must be agreed with Natural
England' should be retained 4.3.60 should retain the wording 'must be agreed with Natural England'. Reasoning - to protect against the erosion of the Green Belt.

Attached documents:

Comment: MM22 - LPMM18/4010  Respondent: F. Newton 10729985  Agent:

I object to MM22
To the proposals for Gosden Hill and Wisley airfield to be classified as new local centres.

Attached documents:

Comment: MM23 - LPMM18/4011  Respondent: F. Newton 10729985  Agent:

MM23
Policy D4 1(b), l(m) and 2(a) and (b) should be retained in order to ensure that new development respects existing open space vistas and takes into account factors such as air and noise pollution.

Attached documents:

Comment: MM25 - LPMM18/4012  Respondent: F. Newton 10729985  Agent:

I object to changes in MM25
Green Belt land should be regarded as an irreplaceable heritage asset.

Attached documents:

Comment: MM27 - LPMM18/4013  Respondent: F. Newton 10729985  Agent:

MM27
The traffic assessment is inadequate and was conducted at a time when traffic would be at its lightest. The increased traffic implications of a huge development will have a negative effect on the whole borough let alone the local communities.

Policy MM27 needs to provide an accurate assessment of the transport implications for the A247, A3 and M25 with the proposed increases in both housing and industrial areas at Wisley, Gosden Hill and Send Marsh/Burnt Common.

Attached documents:
I object to MM41 Land at Garlicks Arch, Send (policy A43)
I object to any number of dwellings let alone the increase numbers from 400 to 550. There are no special circumstances to develop the land including the Government’s flawed guess at housing need or money as was the case with the last two planning applications on the site 14/P/00219 and 16/P00783 for just 9 and 25 houses. The land is green belt and should remain so out of public heritage and longterm interest. The site is in the "SPA” zone. There is insufficient infrastructure to support any development. There are no local amenities other than one petrol station to support any development.

There are no nearby schools with spaces or many spaces in any distant schools to support development. The development would bring possibly over 1000 extra cars into an area already traffic saturated. There will be an increase in pollution from the extra stationary traffic which will cause health issues. The site is at the limits for emergency services to attend quickly so lives will be put at risk. There is only one local medical centre which is at full capacity at present. There is ancient woodland and protected trees on the site. These will be put in harm. Any development in this area that is inappropriate and would be detrimental of Send Village and Guildford as a borough.

I object to MM41(0a) to the main access being off A247 Clandon Road.
The A247 is already very dangerous when trying to pull out onto or even off it more cars will make it near impossible. We feel we will end up being house bound along with many of our neighbours. The road is extremely dangerous to cross on foot as there are no crossing places or even footpaths on part of it more traffic will add to this danger. The traffic survey must be flawed as the A3 cannot take the extra traffic southbound as it is often stationary into Guildford and the A3 is backed up from the M25 to Burntcommon daily so any extra cars will add to this congestion and pollution. The roads to Ripley and Send are at capacity with commuter traffic.

I object to MM41(0b) to the through road from the B2215 Portsmouth Road and the A247 to provide an alternative route that relieves pressure on Send Marsh roundabout. This cut through will destroy the pleasant country aspect enjoyed by many residents. The huge increase in traffic will produce excessive noise and air pollution. If Send Barns (Burntcommon) roundabout is under pressure don't build 550 new homes nearby. The increased road usage is likely to cause accidents if not fatalities. There will be a loss or damage to established trees and ancient woodland.

I object to MM41(0c) to the Permeability for pedestrians and cyclists into the development from the B2215. Giving better access to a death trap is not acceptable. There are no close amenities for pedestrians to walk too so better access is pretty pointless.

I am in FAVOUR of to MM41(0d) Necessary and proportionate contribution towards an off-site walking and cycle network to the village centre of Send, the Burntcommon Warehouse site and Clandon railway station.

Asking for a contribution to fix the problems Guildford Borough Council is creating for itself by supporting this development is sensible.
The contribution should also consider work to improve and refurbish the pavement/cycle way to Guilford Town Centre. The contributions should consider the need for a number of light controlled crossing places to safely get to Send. There are no adequate cycle lanes so major road works and moving of pavements will be necessary. Access to the warehouse will require lights at Burntcommon roundabout and a fair amount of extra pavement and a whole new cycle way which should be extended to the one in disrepair along the A3. It is just over a mile to Clandon and the speed limit will need to be reduced and a number of light controlled crossing places need to be installed on the A247. Street lighting is also essential. A survey into road widening for a cycle path undertaken as the pavements are too narrow to accept pedestrians and cycles and there are not footpaths on both sides of the road so some compulsory purchases for land will need to be made to make the route safe enough so not to endanger lives.

Attached documents:
I object to MM41(0e) Necessary and proportionate contribution towards mitigation schemes to address the otherwise adverse material impacts on communities and the environment, including Send, Ripley and West Clandon

Guildford Borough Council are not acting in the best interests of the public acknowledging there will be adverse material impacts on communities and then believing collecting contributions is better than looking after this very community in the first place. There is no amount of contributions that can fix the environmental damage this development will cause in the short or long term. Can Guildford Borough Council expect to collect a contribution proportionate enough to help the impact on hospitals, emergency services or that is proportionate to cover the loss of a life because they will be further stretched beyond coping. No amount of money to the council will bring back a life. How will Guildford Borough Council be able to collect a proportionate contribution to build new schools or extend old ones prior to the 100's of new children moving into these new properties.

I object to MM41(0f) Increase landscaping buffer/strategic planting etc
No amount of planting or landscaping will hide the A3 noise and air pollution from these new houses or these houses and their extra cars noise from the or surrounding roads. There is not enough room for 550 dwellings and the trees needed to hide them. Who will continue to take care of this extra landscaping, buffers and strategic planting when the developer departs and who pays as it sounds very expensive.

Attached documents:

Comment: MM5 - LPMM18/4007  Respondent: F. Newton 10729985  Agent:  
I object to MM5  
[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] from it.

Attached documents:

Comment: MM9 - LPMM18/4008  Respondent: F. Newton 10729985  Agent:  
I object to MM9  
Any residential and commercial development proposals within the Green Belt should as a matter of policy and public interest not be approved.

Attached documents:

Comment: MM41 - LPMM18/4214  Respondent: Joan Bagnall 10731361  Agent:  

MM41 Land at Garlick’s Arch, Send Marsh, Policy A43

A further increase of the number of houses to be built here is excessive. When your letter states that the Local Plan sets out  " protecting and enhancing our natural environment, improving leisure and visitor facilities" and "addressing transport and infrastructure needs". 
This area is Green Belt with ancient woodland and contrary to the above statement. For health reasons my husband and I walk two miles or more each day around the Parish and increasingly find that the noise from the volume of traffic using the Portsmouth Road, Send Barns Lane and Send Marsh Road make it almost impossible to have an uninterrupted conversation and that the levels of vehicle emissions are now making this pastime unpleasant and unhealthy. The increased volume from further housing at Garlick's Arch will only make this worse and insufficient planning to address transport and infrastructure needs has been given to address the extra traffic in the area.

Attached documents:

Comment: MM42 - LPMM18/4215  Respondent: Joan Bagnall 10731361  Agent:

MM42 Land at Burnt Common, London Road, Send Policy A58

There is no need to put new industrial sites in this Green Belt land when Slyfield site still has unused land for this purpose.

Attached documents:

Comment: MM44 - LPMM18/4216  Respondent: Joan Bagnall 10731361  Agent:

MM44 Land at Alderton's Farm, Send Marsh Road - policy A63

This land is also Green Belt and in contravention of GBS's stated policy and, with the other proposed large developments will further add to the traffic congestion in the area and in particular at Send Crossroads and the junction with Portsmouth Road, especially at busy periods in the morning and evening.

Attached documents:

Comment: MM9 - LPMM18/4217  Respondent: Joan Bagnall 10731361  Agent:

MM9 Green Belt Policy

GBC's plan does not provide the "special circumstances" to claim that an exception for "limited infilling" in the Green Belt to be permitted within the village.

I hope that GBC will reconsider its current proposals

Attached documents:

Comment: MM2 - LPMM18/1470  Respondent: Leslie Bowerman 10732193  Agent:
6) Objection re the over-all effect which the Modifications bring to other developments in Send.

What I have described as the ‘punitive’ Modifications above, combined with the figures already incorporated into the Plan (ie 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and the 25% increase in the Send Business Centre), plus the new Marina being constructed off Tannery Lane, does mean that such a heavy concentration of development in one village rather than with 40 villages, is way beyond reasonable and does appear to be designed to a) punish Send for making so many objections rather than taking the objections into account which is supposed to be what happens, or b) change Send beyond all recognition so that other villages do not have to be much altered. Either way this is wrong and a travesty of justice.

7) Further objections on the now highlighted fact that estimates in the Plan for future housing needs were incorrect.

I object to all the MMs and previous calculations where Guildford Borough housing needs were said to be 789 a year. The basis on which this figure was arrived at was never published and it has recently transpired that it was grossly exaggerated as was previously strongly suspected. A respected consultancy, Barton Willmore, has very recently said that the correct figure should be 431. September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both of these recent figures are greatly less than the total used by the Inspector. If these, apparently more reliable, figures are used it would make a huge difference to developments in Send. The bulk of the reduction should be applied to Send and its surrounding since that village was disproportionally penalised in the first place.

Attached documents:

Comment: MM27 - LPMM18/1465  Respondent: Leslie Bowerman 10732193  Agent:

5) Objection applying generally to MM27, MM41, MM42 & MM48. Transport Strategy,

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads. The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

Attached documents:

Comment: MM41 - LPMM18/1461  Respondent: Leslie Bowerman 10732193  Agent:

2) MM41. Land at Garlicks Arch, Send Marsh, Policy A43.

This appears to be a ‘punishment’ instance where the original grossly excessive number of 400 homes in a totally unsuitable location appears to have been increased to 550 because thousands of local residents have had the nerve to object strongly.

The impact of 550 households on traffic around Send and Send Marsh, not to mention Burnt Common itself, will be devastating. The area already suffers long hold-ups, especially during peak and holiday times. An extra 800 or so cars will clog surrounding over-busy roads and lanes for miles around. The resulting increase in traffic will also increase the noise and air pollution from traffic which is already audible from at least a mile away, depending on the wind direction.
Some 550 new houses will grossly affect the nature of what is presently a pleasant rural village. Ancient woodland, especially in the Green Belt, should be given utmost protection as it has already hugely diminished. Brown-field sites are available elsewhere. The site is unsuitable anyway, being subject to flooding and contaminated with lead shot.

School facilities are already inadequate, not least due to the unconscionable closure of Ripley First School. Medical facilities are already over-stretched. To join up Send, Send Marsh and Ripley, which this would do, would be a case of unnecessary over-development.

No direct evidence has been produced for the 400 new houses, let alone 550, the number of which would be greatly out of keeping with the area.

**Attached documents:**

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**Comment:** MM41 - LPMM18/1467  **Respondent:** Leslie Bowerman 10732193  **Agent:**

5) Objection applying generally to MM27, MM41, MM42 & MM48. Transport Strategy,

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads. The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

**Attached documents:**

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**Comment:** MM42 - LPMM18/1463  **Respondent:** Leslie Bowerman 10732193  **Agent:**

3) MM42. Land at Burnt Common, London Road, Send. Policy A58.

I strongly object to this as the area concerned has been increased from 7,000sqm to a minimum of 14,800sqm. Is this serious or is it a mistake? If this is a minimum, how will it be enforced if too few applications are made. And presumably without a maximum, the sky is the limit.

Since being deleted from the 2014 plan this has been increased twice, at least doubling the size, making it the largest new industrial allocation in any village in the area and with no evidence of need being produced. This sounds very much like another ‘punitive’ instance.

In any event there is absolutely no need to place new industrial sites in the Green Belt, especially when there is available space at Slyfield. There are no special circumstances so it would appear to be contrary to MM9. Indeed, the Employment Land Needs Assessment showed a reduction in demand for industrial land.

This proposal is additional to the 25% enlargement at the so-called ‘Send Business Centre’ in which case there will be a larger concentration in Send than any other village and, crucially, no evidence of demand. What is going on? Narrow, winding single-lane lanes around the Business Centre will lead to frequent gridlock. Nitrogen dioxide levels are already dangerous.

**Attached documents:**
5) Objection applying generally to MM27, MM41, MM42 & MM48. Transport Strategy,

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads. The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

Attached documents:

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4) MM44. Land at Aldertons Farm, Send Marsh Road. Policy A63.

This area for a proposed 120 homes was deleted from the 2014 plan and has since been increased twice, doubling the acreage involved. It was put back in until the public examination in July despite all the objections against and no evidence being produced in favour. Clearly another instance of ‘punishment’, which is not what the exercise is about.

If allowed, this development will severely detract from the heritage appeal of the beautiful Send Marsh Green which it adjoins. It will also detract from the attractiveness of the listed Aldertons Farm and its neighbouring Old Hall and constitute a raised eyesore and drainage problems to the properties on the north side of Send Marsh Road opposite this site.

The considerable resulting traffic will create serious problems at Mays Corner at the Send end of Send Marsh Road and will be a serious source of damage to the two 16th century timber-framed cottages between which Send Marsh Road makes a 90 degree bend. Traffic already sometimes backs up to Send Marsh Green on its way to the old Portsmouth Road and 120 extra homes will also make that problem very much worse. There have been a number of accidents already where the narrow road makes its 90 degree bend.

Together with Garlicks Arch (550), Clockbarn (90) and Winds Ridge (40), this site will result in 770 houses being added to the existing 1700 in Send. This is far too much for the infrastructure and will adversely affect the nature of this pleasant village to the detriment of the existing residents.

This is another Green Belt site with again no evidence of special circumstances, so it is contrary to MM9 and should be deleted.

The area of this site and its surrounds are hugely popular with walkers and cyclists which the Plan aims to encourage, but extensive development such as is proposed here will greatly discourage them.

Attached documents:

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5) Objection applying generally to MM27, MM41, MM42 & MM48. Transport Strategy,

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads.
The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

**Attached documents:**

**Comment:** MM9 - LPMM18/1458  **Respondent:** Leslie Bowerman 10732193  **Agent:**

I live at Send Marsh in one of the most beautiful and delightful heritage spots in Surrey, albeit that access is already much hindered by traffic on the nearby Portsmouth Road and the A3 at one end of the hamlet and by the A247 through the village of Send at the other end. I am appalled by the total and contemptuous dismissal of the thousands of local objections to the previous plan and the literally punitive proposed increase in development of this area. I regret to say that it smacks more of the abuse of power by over-mighty autocratic rulers seen recently elsewhere in the world than of responsible local democracy in action in rural Surrey.

Specifically, I object as follows:

1) MM9 Green Belt Policy.

As everybody knows, the Green Belt is not supposed to be built on except in exceptional circumstances and no exceptional circumstances have been suggested here. Therefore this proposal appears to be illegal. The same would seem to apply to the device of removing areas from Green Belt protection and then proposing development.

**Attached documents:**

**Comment:** MM27 - LPMM18/1085  **Respondent:** Ruth Hunter 10733409  **Agent:**

**OBJECT to MM41 and MM42 and MM9 and MM27 and MM48**

I strongly object to main modifications to above policies.

The increase in the amount of new houses (MM41) is preposterous. It is too much for the village and will create insurmountable problems in destroying natural habitats, Flora and fauna; the traffic congestion will block roads and access for residents and emergency services; there will be flooding and the infrastructure and facilities of Ripley and Send stretched to breaking point. This is an irresponsible plan which should not go ahead.

Re MM42, there is no need for so much industrial warehousing when Slyfield is not running at capacity. It is too much for our villages and goes against everything in MM9.

The proposed changes to A3 at Burnt Common has not been properly assessed and will cause chaos on our roads and risk safety of many resident children and vulnerable elderly.

Please re think these modifications and stop this unnecessary development.

**Attached documents:**
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Attached documents:

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**Comment:** MM9 - LPMM18/1084  **Respondent:** Ruth Hunter 10733409  **Agent:**

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The proposed changes to A3 at Burnt Common has not been properly assessed and will cause chaos on our roads and risk safety of many resident children and vulnerable elderly.

Please re think these modifications and stop this unnecessary development.

Attached documents:

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**Comment:** MM2 - LPMM18/4724  **Respondent:** Debbie Leane 10742753  **Agent:**

I am writing regarding Guildford Borough Council’s latest modifications to the Local Plan. As a resident of Send village for many years, I strongly object to these modifications to our local area. It is very clear that once again Guilford Borough Council has failed to listen to its local residents and properly plan for an increase in the demand for more housing. It has once again disproportionately focussed the entire burden on our village.

...

I would also like to object again to the 40 houses and travellers site on Send Hill; the 60 houses at Clock barn in Tannery Lane and the 25% increase in size of the Send Business Centre. Added to the other housing sites and industrial sites all concentrating around one village how can any of this be deemed as a reasonable proposal.
Comment: MM27 - LPMM18/4738  Respondent: Debbie Leane 10742753  Agent: MM27 MM41 MM42 and MM48 Transport strategy

I object to the A3 changes and the Clandon slip roads as the GBC has not carried out a proper assessment of the traffic implications on Send Barnes Lane and Send Road. These changes will lead to thousands more cars making their way through Send to get into Woking town centre. There are serious implications for such an enormous increase in traffic on pollution levels, noise, traffic jams etc. This has not been carefully assessed.

Attached documents:

Comment: MM41 - LPMM18/4730  Respondent: Debbie Leane 10742753  Agent: MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The increase from 400 to 550 homes (an incredible 37% increase) is far too much for this area. This will not only lead to both Send and Ripley villages joining up but will undoubtedly cause over development. Hundreds more cars will only further exacerbate the traffic problems and dangers we already face around this area, blocking up more roads and causing more traffic chaos. The local infrastructure will not be able to cope with such a huge increase in demand, particularly with a local school having recently been closed and with an already overstretched medical centre. I also object to the fact that this area is also green belt and contains ancient woodland that we must preserve for our future generation.

Attached documents:

Comment: MM41 - LPMM18/4740  Respondent: Debbie Leane 10742753  Agent: MM27 MM41 MM42 and MM48 Transport strategy

I object to the A3 changes and the Clandon slip roads as the GBC has not carried out a proper assessment of the traffic implications on Send Barnes Lane and Send Road. These changes will lead to thousands more cars making their way through Send to get into Woking town centre. There are serious implications for such an enormous increase in traffic on pollution levels, noise, traffic jams etc. This has not been carefully assessed.

Attached documents:

Comment: MM42 - LPMM18/4731  Respondent: Debbie Leane 10742753  Agent: MM42 Land at Burnt Common, London Road, Send, Policy A58
I strongly object to the increase from 7000 to a minimum of 14,800 sq m of industrial and storage. This would be the largest new industrial site in any village within the Guildford borough. More importantly, there is no need for such a new industrial site when Slyfield in Guildford currently has empty sites and units. In fact, if you look at the Employment Land Needs Assessment, it showed demand for industrial land has decreased. Such a huge allocation will only add to the traffic problems we currently have along our narrow surrounding roads. These roads already become gridlocked during rush hour. The high rise in traffic will further increase the already dangerous levels of atmospheric nitrogen dioxide levels within the village.

Attached documents:

Comment: MM42 - LPMM18/4732  Respondent: Debbie Leane 10742753  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

I strongly object to the increase from 7000 to a minimum of 14,800 sq m of industrial and storage. This would be the largest new industrial site in any village within the Guildford borough. More importantly, there is no need for such a new industrial site when Slyfield in Guildford currently has empty sites and units. In fact, if you look at the Employment Land Needs Assessment, it showed demand for industrial land has decreased. Such a huge allocation will only add to the traffic problems we currently have along our narrow surrounding roads. These roads already become gridlocked during rush hour. The high rise in traffic will further increase the already dangerous levels of atmospheric nitrogen dioxide levels within the village.

Attached documents:

Comment: MM42 - LPMM18/4741  Respondent: Debbie Leane 10742753  Agent:

MM27 MM41 MM42 and MM48 Transport strategy

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Attached documents:

Comment: MM48 - LPMM18/4742  Respondent: Debbie Leane 10742753  Agent:

MM27 MM41 MM42 and MM48 Transport strategy

I object to the A3 changes and the Clandon slip roads as the GBC has not carried out a proper assessment of the traffic implications on Send Barnes Lane and Send Road. These changes will lead to thousands more cars making their way through Send to get into Woking town centre. There are serious implications for such an enormous increase in traffic on pollution levels, noise, traffic jams etc. This has not been carefully assessed.

Attached documents:
**Comment: MM9 - LPMM18/4734  Respondent: Debbie Leane 10742753  Agent:**

MM9 Green Belt Policy

These current modifications have claimed to protect our Green Belt except in special circumstances: ‘limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This is incredibly subjective and refutes Green Belt protection. This implies an open invitation to developers and speculators to build on the land on the edges of our village. This will have massive implications for our residents.

**Attached documents:**

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**Comment: MM27 - LPMM18/623  Respondent: Nicola Jones 10743105  Agent:**

MM27, MM41, MM42, MM48 – taken together as the transport strategy. The implications of the increase in traffic from nearly doubling the housing in the village, other local development plans such as Wisley and Gosden Farm, plus the proposed changes to the A3 junction at Burnt Common have not been adequately addressed by Guildford Borough Council or any other responsible agency. Thousands of extra vehicles will be heading through Send on the A247 every day. The road is already over congested with long queues at peak hours. [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/ Data Protection Act 2018] I am extremely concerned for my health and that of my children. I, and two of my children are asthmatic and I am very worried about the increase in levels of nitrogen dioxide and other pollutants and particulates which would be inevitable with additional traffic. There is also a primary school along this route and the traffic increase would have a deleterious affect on the health of the children.

**Attached documents:**

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**Comment: MM41 - LPMM18/3121  Respondent: Nicola Jones 10743105  Agent:**

MM41 – 37% increase in the housing proposal at Garlick’s Arch is excessive and the local infrastructure in terms of schools, medical facilities and roads will be unable to cope. The development impacts on ancient woodland and is on green belt, the loss of which will blur the boundaries of Send, Send Marsh and Ripley. Approximately 800 additional cars will block up already over congested roads.

MM44 + MM41 + development on other sites already proposed a Tannery Lane and Send Hill will increase the housing capacity in Send by 770, a 41% rise. This is unacceptable and is completely out of keeping with the character of the villages, particularly, as evidenced by previous objections, it is so clearly against the wishes of the people whose community this is.

MM27, MM41, MM42, MM48 – taken together as the transport strategy. The implications of the increase in traffic from nearly doubling the housing in the village, other local development plans such as Wisley and Gosden Farm, plus the proposed changes to the A3 junction at Burnt Common have not been adequately addressed by Guildford Borough Council or any other responsible agency. Thousands of extra vehicles will be heading through Send on the A247 every day. The road is already over congested with long queues at peak hours. As a resident of Send Barns Lane (A247) I am extremely concerned for my health and that of my children. I, and two of my children are asthmatic and I am very worried about the increase in levels of nitrogen dioxide and other pollutants and particulates which would be inevitable with additional traffic. There is also a primary school along this route and the traffic increase would have a deleterious affect on the health of the children.
Comment: MM42 - LPMM18/3122  Respondent: Nicola Jones 10743105  Agent:

MM42 – the increase in the industrial site in a Green Belt area is unsuitable for a rural village and is unnecessary because there is additional capacity in the existing industrial site at Slyfield. The proposal will alter the rural character of Send and is disproportionate. No other rural village in the borough is being asked to accept the alteration of its character in this manner. There are no special circumstances which would justify using a Green Belt site for this purpose.

MM27, MM41, MM42, MM48 – taken together as the transport strategy. The implications of the increase in traffic from nearly doubling the housing in the village, other local development plans such as Wisley and Gosden Farm, plus the proposed changes to the A3 junction at Burnt Common have not been adequately addressed by Guildford Borough Council or any other responsible agency. Thousands of extra vehicles will be heading through Send on the A247 every day. The road is already over congested with long queues at peak hours. As a resident of Send Barns Lane (A247) I am extremely concerned for my health and that of my children, I, and two of my children are asthmatic and I am very worried about the increase in levels of nitrogen dioxide and other pollutants and particulates which would be inevitable with additional traffic. There is also a primary school along this route and the traffic increase would have a deleterious affect on the health of the children.

Comment: MM44 - LPMM18/3123  Respondent: Nicola Jones 10743105  Agent:

MM44 – I object to the reinsertion of this proposal, especially as it was dropped following previous objections. Residents should NOT have to keep wasting their time re-objecting to proposals which have already been proved unacceptable. This is a Green Belt site which acts as a separation barrier between Send and Send Marsh and there are no special circumstances which would make the use of this site for development acceptable (other than profiteering at the expense of the local community).

MM44 + MM41 + development on other sites already proposed a Tannery Lane and Send Hill will increase the housing capacity in Send by 770, a 41% rise. This is unacceptable and is completely out of keeping with the character of the villages, particularly, as evidenced by previous objections, it is so clearly against the wishes of the people whose community this is.

Comment: MM48 - LPMM18/627  Respondent: Nicola Jones 10743105  Agent:

MM27, MM41, MM42, MM48 – taken together as the transport strategy. The implications of the increase in traffic from nearly doubling the housing in the village, other local development plans such as Wisley and Gosden Farm, plus the proposed changes to the A3 junction at Burnt Common have not been adequately addressed by Guildford Borough Council or any other responsible agency. Thousands of extra vehicles will be heading through Send on the A247 every day. The road is already over congested with long queues at peak hours. [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/ Data Protection Act 2018] I am extremely concerned for my health and that of my children, I, and two of my children are...
asthmatic and I am very worried about the increase in levels of nitrogen dioxide and other pollutants and particulates which would be inevitable with additional traffic. There is also a primary school along this route and the traffic increase would have a deleterious affect on the health of the children.

I really hope that the real and valid concerns of the people of Send will be listened to this time.

**Attached documents:**

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**Comment: MM9 - LPMM18/617  Respondent: Nicola Jones 10743105  Agent:**

I wish to object to the current incarnation of the Guildford Local plan as it affects the village of Send and its surrounding green belt land. I wish to have noted in the strongest terms my disquiet at the process by which this plan has evolved. In particular, the manner in which previous strong and valid objections from the local people have been ignored to the extent that housing figures which had previously been objected to by large numbers of local residents have been substantially increased. My specific objections are to the following amendments to the plan.

MM9 Green Belt Policy – the proposal to allow “limited infilling outside the identified settlement area” sets up a dangerously vague principle subject to different interpretation and could be used to ‘infill’ to a large extent the green belt which currently protects Send village and separates it from neighbouring settlements and indeed from Guildford itself.

**Attached documents:**

---

**Comment: MM41 - LPMM18/2434  Respondent: Veronica Kean 10750337  Agent:**

I object to MM41 Land at Garlicks Arch Send Marsh policy A43

The 7000 objections to the previous lower number of proposed housing has been ignored and the current proposal of an increase to 550 houses is outrageous.

The current traffic congestion is already at breaking point and increased housing will cause further grid lock and misery to local residents.

The strain on the Doctors surgery will be further increased.

The land floods frequently and building on this site could have environmental consequences to areas hitherto unaffected.

It is green belt land with ancient woodland that will have devastating consequence to local wild life.

I object to MM43 Land at Burnt common, London Road, Send, Policy A58

There is no need to increase the industrial storage when Slyfield has unused capacity.

Impact to traffic congestion in narrow surrounding roads will cause gridlock.

I object to MM44 land at Alderton’s farm, Send Marsh Road, Policy A63

This plan had already been deleted from an earlier draft because of all the objections and yet has been reintroduced.

It is Green Belt Land
Increased traffic and pressure on the Send crossroads will have a detrimental impact on the lives of residents with increased noise, nitrogen oxide pollution, delays and gridlock.

The combined impact of all these proposals and modifications is too much development for one village.

Attached documents:

**Comment: MM27 - LPMM18/61  **Respondent: Jo Williams 10750593  **Agent:**

**MM27, MM41, MM42, MM48 - Transport Strategy**

The implications have not been properly assessed or addressed by the A3 changes and the Clandon slip roads. Potential significant traffic impact upon Send Barnes Lane and Send Road of traffic heading for Woking, increased noise and pollution levels, additional delays and gridlock on the roads.

Attached documents:

**Comment: MM41 - LPMM18/57  **Respondent: Jo Williams 10750593  **Agent:**

Dear Sir/Madam

I am writing with the following strong objections to the local plan:

**MM41 – Land at Garlicks Arch, Send Marsh, Policy A43**

The initial proposal to build 400 homes at Garlicks Arch was a ridiculous proposal and received 7000 objections. The previous objections to this have been ignored. To have increased this to 550 homes (an increase of 37%) is overly excessive and is made in complete disregard of the previous objections. The land is in the Green Belt and contains ancient woodland, drainage is poor and the land is subject to frequent flooding, it is also contaminated with lead shot. Development here would join up the villages of Ripley and Send, there would be no distinction between the two villages constituting over development. Perhaps most significantly, the surrounding infrastructure cannot cope – roads around the village are snarled up with traffic with increasing pollution levels, the increased volume of traffic, (assuming the majority of households have two cars), is unmanageable and from a health standpoint it increases risk. The doctor’s surgery is at breaking point, as verbalised by the staff at the surgery directly, local schools cannot cope, (and a local infants school in Ripley has been closed increasing the pressure on the remaining schools in the area).

Attached documents:

**Comment: MM41 - LPMM18/62  **Respondent: Jo Williams 10750593  **Agent:**

**MM27, MM41, MM42, MM48 - Transport Strategy**

The implications have not been properly assessed or addressed by the A3 changes and the Clandon slip roads. Potential significant traffic impact upon Send Barnes Lane and Send Road of traffic heading for Woking, increased noise and pollution levels, additional delays and gridlock on the roads.
This was deleted from the plan in 2014, presumably there was recognition at the time that there was, and still is, insufficient demand for industrial sites. The Employment Land Needs Assessment showed a reduction in demand for industrial land. With industrial units till empty in the Borough it is ludicrous to propose increasing the initial proposal of 7000 to 14,800 square meters of industrial sites and storage, indeed the original proposal of 7000 sq m is not required – Slyfield has unused capacity for example and there are no special circumstances which contradict MM9. The village is already significantly under strain from the thunderous HGVs that pass through our roads, these are already gridlocked and pollution levels are already dangerously high.

Yet another proposal for an unrealistic number of homes, 120 (including some self-build) on top of what’s being proposed at Garlicks Arch, Clockbarn, Winds Ridge – in total a proposal of 770 houses in addition to the 1700 currently in Send, an increase of 45% which is completely unrealistic and too much for the surrounding infrastructure. This was deleted from an earlier draft of the local plan because of all the objections and not re-inserted until the public examination in July. Again this is a Green Belt site with no special circumstances which contradicts policy MM9.

The implications have not been properly assessed or addressed by the A3 changes and the Clandon slip roads. Potential significant traffic impact upon Send Barnes Lane and Send Road of traffic heading for Woking, increased noise and pollution levels, additional delays and gridlock on the roads.

It's about time reasonable proposals were submitted in the local plan, constant challenge an objections to the plan are not helpful and are no doubt expensive to manage. Reasonable proposals are likely to be viewed more favourably.

Regards

Jo Williams
Comment: MM9 - LPMM18/60  Respondent: Jo Williams 10750593  Agent:

MM9 – Green Belt Policy

Modifications claim to protect the Green belt except in very exceptional circumstances. This is highly subjective, introduces uncertainty and potentially negates Green Belt protection.

Attached documents:

Comment: MM2 - LPMM18/3995  Respondent: John Herbert 10756033  Agent:

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (as through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247
I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4 ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30 mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for

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traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.

4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

### Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

### E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**
MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/3996  Respondent: John Herbert 10756033  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

F. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3.Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/3999  Respondent: John Herbert 10756033  Agent:
MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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<thead>
<tr>
<th>Comment: MM32 - LPMM18/4000</th>
<th>Respondent: John Herbert 10756033</th>
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<tbody>
<tr>
<td>MM32 A height limit for <strong>White Lion Walk</strong> is required.</td>
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**Attached documents:**

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<thead>
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<th>Comment: MM33 - LPMM18/4001</th>
<th>Respondent: John Herbert 10756033</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at <strong>Slyfield</strong> and green roofs for commercial buildings within the site to minimise impact on views from the AONB.</td>
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<th>Comment: MM35 - LPMM18/4002</th>
<th>Respondent: John Herbert 10756033</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM35 <strong>Gosden Hill Farm</strong> should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.</td>
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<td>MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.</td>
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<tr>
<td>MM35 If some early development occurs at <strong>Gosden Hill</strong> to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.</td>
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<tr>
<th>Comment: MM41 - LPMM18/4003</th>
<th>Respondent: John Herbert 10756033</th>
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<tr>
<td>MM41 <strong>Garlick’s Arch</strong> should be retained as Green Belt in view of the revised housing need, rather than expanded.</td>
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Comment: MM44 - LPMM18/4004  Respondent: John Herbert 10756033  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/3998  Respondent: John Herbert 10756033  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/3733  Respondent: Jo Murray 10756641  Agent:

As a long-time resident of Send, I object strongly to the Local Plan's threat to utterly over-develop our village and to negate its Green Belt protection. Adding 770 houses to a current village of 1700 houses is a massive over-development and cannot possibly be justified.

POLICY S2

The Office for National Statistics data from September suggests that appropriate growth in Guildford Borough can be achieved with 460 houses each year. This is a much lower figure than that in the Planning Inspector's Report and shows that throughout this whole process the housing need has been greatly exaggerated.

Attached documents:

Comment: MM41 - LPMM18/3735  Respondent: Jo Murray 10756641  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

This is Green Belt land and a beautiful part of Send. There is no need to build on Green Belt land for any reason currently; there are no special circumstances, so this is against GBC's MM9 Green Belt Policy. The site features ancient woodland and I consider it would be a criminal act to destroy it. It is also land that floods frequently and will therefore be more expensive to build on than other sites and could cause even worse flooding throughout the village than has recently been experienced, leading to damage to other residents' properties and to our local roads.

The Inspector is ignoring thousands of previous objections to a lower number of houses at this site and an increase of nearly 40% is excessive. The two villages of Send & Ripley will become joined and this constitutes over-development.
There are insufficient school places or medical facilities to cope with such a huge increase in the size of our village and local roads are already gridlocked throughout the morning and evening rush hours.

Attached documents:

**Comment:** MM42 - LPMM18/3736 **Respondent:** Jo Murray 10756641 **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

This land was previously deleted from the 2014 Plan following thousands of objections but the proposed development has now been more than doubled in size. No other village in the borough has been allocated such a large industrial allocation and no need for such a massive industrial allocation has been proven at all, never mind on our Green Belt. In fact, the most recent Employment Land Needs Assessment showed a reduction in demand for industrial land. There is unused capacity at nearby Slyfield. Yet again, there are no special circumstances so this is against GBC's MM9 Green Belt Policy.

Attached documents:

**Comment:** MM27 - LPMM18/146 **Respondent:** Mrs Lizzie George Buchhaus 10757185 **Agent:**

The traffic implications for Send Road and Send Barnes road are horrific including pollution, increased noise delays, accidents and gridlock. I live on Send Road and this is not acceptable

Attached documents:

**Comment:** MM41 - LPMM18/149 **Respondent:** Mrs Lizzie George Buchhaus 10757185 **Agent:**

37% increase in the number of houses proposed..unacceptable

7000 previous objections ignored

at least 800 extra cars causing congestion, pollution

school and medical facilities will be at crisis point

Attached documents:

**Comment:** MM42 - LPMM18/147 **Respondent:** Mrs Lizzie George Buchhaus 10757185 **Agent:**

There is capacity at slyfield and green belt should not have further industrial building on the green belt
increased nitrogen dioxide levels health risks contradicts mm9
unnecessary increase in send of industrial units greater than other villages with no proven demand

**Attached documents:**

<table>
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<tr>
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<th>Respondent: Mrs Lizzie George Buchhaus 10757185</th>
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<tbody>
<tr>
<td>Green belt site, no special circumstances, contradicts mm9</td>
<td>increased traffic at Send crossroads</td>
<td>too many houses</td>
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<td>in one village 45%.. too much for infrastructure</td>
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<td>The modifications to protect green belt and phrase hsbc can make an exception effectively negates the green belt policy</td>
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<th>Comment: MM45 - LPMM18/724</th>
<th>Respondent: Mary Turnill 10772961</th>
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<tr>
<td>Submission Local Plan - Normandy</td>
<td>I wish to add my own objections to the new local plan. Rather than repeat all the comments my husband has made, I wish to post my complete agreement to the comments he has made below.</td>
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<td>I wish to OBJECT most forcibly with the proposed development in Normandy in Glaziers Lane. My reasons for objection are as follows:- Inadequate Infrastructure, especially the lack of suitable roads; flooding and Sewage problems leading to severe Health considerations; The impact on the Environment; The use of Red notated agricultural land, and in the Green Belt for building 105 houses; The lack of local consultation with GBC to discuss the desires of the Village, in line with the Governments declared policy of the need to ensure that the village actually WANTS the extra housing. I will expand on each.</td>
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<td>1. Inadequate Infrastructure.</td>
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<td>I refer primarily to the effect 105 extra houses, each with a probable two cars, will have on the local traffic situation, which is already creaking. Glaziers Lane is a country lane, which has a dangerous bridge associated with the railway line. This road is on the border of the planned development.</td>
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<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
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</table>
Whenever there is an accident on the Hogs Back or A3, traffic tries to exit via Wanborough Hill to use Glaziers Lane, which is neither capable nor designed to take that volume of traffic. Anyone who tries to access the A31 at peak traffic times from either the Puttenham or Wanborough directions will know how long the queues are, and the potential for accidents for traffic leaving the A31 at the Puttenham turn off. This could severely jeopardise Emergency traffic trying to access the new development, whose road structure might well be not capable of allowing Fire and Ambulance vehicles to attend an emergency, especially during peak traffic times.

2. Flooding and associated Sewage Problems.

Parts of Normandy, especially at the southern edge of the proposed development and in the area next to the Hoe stream, are subject to severe flooding problems, and the associated release of sewage into people's properties and into the Hoe stream. The Station Car Park is regularly flooded during the downpours which have been occurring frequently. The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a severe health hazard.

The proposed development area at present allows natural drainage through the soil and trees, although the water table is already high in this area; if this area is concreted over, the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area. It is noted that no infrastructure has been planned to take care of this hazard.

Environmental Impact

The village of Normandy lies within an area of outstanding natural beauty close to the Surrey Hills to the South and the Army Heathland to the North. It provides a welcome rural break between the towns of Aldershot and Guildford, and is in designated Green Belt. It features a wide range of wild life, including many endangered and protected species, and the addition of 105 households, with their associated cats, would decimate much of the wild life that lives here. In addition, the replacement of the present agricultural land with housing would remove a valuable habitat for all the wild creatures that have come to rely on the peaceful nature of the area.

3. The use of non-safeguarded Agricultural Land for Building.

The area proposed for building 105 houses in Green Belt, designated Red agricultural land, which has been constantly used for grazing and livestock. The government has repeatedly said that such land should NOT be used for building, unless there were overwhelming requirements to do so. These requirements have not been shown to exist in this village, and sufficient use of Brown field sites has not been adequately explored.

4. Legal aspects

Guildford Borough Council, unlike the other Surrey Councils, insists that there is a requirement for double the number of houses in this area compared with theirs, an estimate now challenged by the Office of National Statistics which says that the estimate 45% too high. That former estimate was provided by a firm which refuses to disclose how it came to that conclusion on the grounds of 'commercial sensitivity'. Thus, the Council has no way of verifying how accurate this estimate is, or what assumptions were used in coming to this figure. It is imperative that this arbitrary figure be challenged, and another firm used who will be transparent in the assumptions it makes, so that a proper estimate can be used.

In summary, and in view of the points I have made above, I would be grateful if you would log my strong objections to the proposal to build 105 houses in Glaziers Lane in the village of Normandy.

Attached documents:

Comment: MM2 - LPMM18/4555  Respondent: Margaret Frisch 10773377  Agent:
1. NUMBER OF HOUSES (MM2)

I object to the planned 12,600 new houses. The recent ONS household forecast has reduced by 6,635 (40%) since the previous forecast, and this needs to be reflected in the Plan. This reduction in households is roughly equivalent to two strategic sites plus all five of the new sites that were included after the Local Plan Examination in Public, and cannot be ignored. The Plan should be updated and resubmitted to the Planning Inspector. When the plan is updated due consideration should also be taken to the negative impact on housing needs in Guildford Borough caused by Brexit including a likely direct reduction in City of London emplyment by some 100 000 and associated indirect job loses.

Attached documents:

Comment: MM3 - LPMM18/4559  Respondent: Margaret Frisch 10773377  Agent:

2. NEW POLICY S3 ON THE TOWN CENTRE (MM3)

The new Town Centre Policy does not include details of what is planned for the town, whereabouts it is planned, or when it is proposed that it should happen. At the Examination in Public the Council stated that the need to demonstrate a 5-year housing supply had led them to allocate rapidly developable sites that were at the least sustainable, and were at the bottom of the hierarchy. The Town Centre Policy should be revised to take advantage of the sustainable opportunities in the town centre, and to reduce the development of sites in the Green Belt.

Attached documents:

Comment: MM40 - LPMM18/4567  Respondent: Margaret Frisch 10773377  Agent:

4. POLICY A35: FORMER WISLEY AIRFIELD (MM40)

The inclusion of Wisley airfield as a development site in the Local Plan ignores the recent dismissal of planning appeal on that site by Secretary of State. The traffic impacts of the proposed development would be the same as those just rejected by the Secretary of State, and are therefore unacceptable, as are the impacts on the local infrastructure (parking, medical provision, schooling etc), particularly when ONS household projections, on which the Local Plan should be based, have been reduced by 40%.

The Site of Nature Conservation Importance (SNCI) which used to cover the entire airfield site has been reduced to about 15-20% of its former size, and about one third of that residual area is land that is “safeguarded” for waste operations. This is inconsistent with paragraph 10(a) of the Policy A35 which states that “Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.”

Attached documents:

Comment: MM9 - LPMM18/4561  Respondent: Margaret Frisch 10773377  Agent:

3. POLICY P2: GREEN BELT (MM9)
Given the greatly reduced housing projections from ONS, and the fact that 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt, then by definition the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist. I strongly object to development in Green Belt under these circumstances.

**Attached documents:**

**Comment: MM41 - LPMM18/1128  Respondent: Mr Jack Aboe 10774817  Agent:**

Increasing the number of houses will directly effect the traffic situation through Send village adversely

**Attached documents:**

**Comment: MM44 - LPMM18/1129  Respondent: Mr Jack Aboe 10774817  Agent:**

I object to this development due to major increase of road traffic and insufficient school places or medical faculties

**Attached documents:**

**Comment: MM2 - LPMM18/786  Respondent: Kate Cheyne 10774881  Agent:**

Relating to all of the above proposals: At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year.

**Attached documents:**

**Comment: MM27 - LPMM18/782  Respondent: Kate Cheyne 10774881  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**
I am a resident in Send at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] and object to the proposed development.

My objections relates to the Main Modification to the proposed development for Send.

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

In spite of previous objections by numerous residents, this has been increased from 400 to 550 homes of which 450 to be built in the first five years. An increase of 37% in the number of houses proposed is excessive.

Approximately 7,000 objections to the previous lower number have been ignored and proposed development continues to increase in scale. My objections are on the basis of:

- This is Green Belt containing ancient woodland.
- Send and Ripley villages will be joined and this constitutes over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will cause congestion in the adjacent roads which are not designed to cope with this scale of traffic
- School and medical facilities will be strained to breaking point; to this point I have seen no plans to increase the capacity of these services

**Attached documents:**

**Comment: MM41 - LPMM18/783  Respondent: Kate Cheyne 10774881  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

**Comment: MM42 - LPMM18/779  Respondent: Kate Cheyne 10774881  Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

This has been increased from 7000 to a minimum of 14,800 sq m of industrial and storage. Since being deleted from the 2014 plan this has been increased twice, doubling the area. It makes a mockery of the ‘consultations’ with residents as we’ve not only been ignored but the numbers have been escalated.

It is by far the largest new industrial allocation in any village in the borough

There is no need to put new industrial sites in the Green Belt when Slyfield has unused capacity.
There are no special circumstances so it also contradicts MM9.

The Employment Land Needs Assessment showed a reduction in demand for industrial sites.

Narrow surrounding roads will be gridlocked.

**Attached documents:**

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**Comment:** MM42 - LPMM18/784  **Respondent:** Kate Cheyne 10774881  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

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**Comment:** MM44 - LPMM18/780  **Respondent:** Kate Cheyne 10774881  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

New site for 120 Homes

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July. Again, ‘consultations’ with residents have been ignored and the numbers have been escalated.

It is a Green Belt site with no special circumstances so it also contradicts policy MM9

It will detract from the heritage buildings at Send Marsh Green

The additional traffic will increase pressure on the Send Crossroads.

With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

**Attached documents:**

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**Comment:** MM48 - LPMM18/785  **Respondent:** Kate Cheyne 10774881  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine
words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

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**Comment:** MM9 - LPMM18/781  **Respondent:** Kate Cheyne 10774881  **Agent:**

**MM9 Green Belt Policy**

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

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**Comment:** Other comments - LPMM18/2680  **Respondent:** Kate Cheyne 10774881  **Agent:**

**Other Developments**

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to this the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

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**Comment:** MM40 - LPMM18/5267  **Respondent:** Keith Jones 10775041  **Agent:**

I find it extremely disappointing and indeed very angry that I have to once again have to write to GBC to OBJECT to your continued plans to build houses on Three Farm Meadows ( Wisley Airfield ). How many times does there has to be declinatures on your Plan with the most recent one from the Secretary of State. Do you not respect both local and national democracy? You know there is massive resentment in Guildford to what you are doing and yet you continue?

I fully support the fantastic work being done by Wisley Action Group and their recent representation made by WAG with advice from Richard Harwood QC. As part of these efforts I would call for the examination in public to be reopened so that the latest Office of National Statistics be used.

Attached documents:

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**Comment:** MM27 - LPMM18/4844  **Respondent:** Wendy Lodge 10775137  **Agent:**
I object to MM27, MM41, MM42 and MM48.

Traffic has increased considerably through Send Village in the past ten years. The extra traffic that is bound to clog the A247 from the new slip roads with the A3 will expose villagers to significantly increased pollution levels. Children walking to the local school already are subjected to this. Another 700 houses with, maybe, a further 1400 cars are not going to help. I do not believe GBC has looked at this in a sufficiently robust manner.

Attached documents:

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**Comment:** MM41 - LPMM18/4811  **Respondent:** Wendy Lodge 10775137  **Agent:**

I object to MM41 change at Garlick’s Arch because:

It ignores all the seven thousand previous objections made by local people

It is beautiful permanent Green Belt and no “exceptional circumstances” exist to allow development on it.

It will cause over-development of our village and the proposed number of houses increased by 37%, from 400 to 550, is excessive.

It will join up Ripley and Send and defeat the key purpose of Green Belt.

It is subject to frequent flooding and is currently a flood zone 2 allocation.

It is contaminated by lead shot accumulated over fifty years.

It will generate excessive traffic, probably up to 1000 extra cars, that will block up the local roads of Send and Ripley.

It adds to the 45% increase in houses in Send which will overwhelm our local services and change the character of the village. The local schools and GP surgery do not have the capacity to serve this increase in population.

Attached documents:

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**Comment:** MM41 - LPMM18/4845  **Respondent:** Wendy Lodge 10775137  **Agent:**

I object to MM27, MM41, MM42 and MM48.

Traffic has increased considerably through Send Village in the past ten years. The extra traffic that is bound to clog the A247 from the new slip roads with the A3 will expose villagers to significantly increased pollution levels. Children walking to the local school already are subjected to this. Another 700 houses with, maybe, a further 1400 cars are not going to help. I do not believe GBC has looked at this in a sufficiently robust manner.

Attached documents:

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**Comment:** MM42 - LPMM18/4839  **Respondent:** Wendy Lodge 10775137  **Agent:**
I object to MM42 Burnt Common, London Road

It was deleted from the 2014 draft because of all the objections made previously, yet GBC have more than doubled the area proposed for industrial/storage, from 7000 to 14,800 m²

Send is a village, separated from Ripley and Send Marsh by narrow but important areas of green belt and will lose all character if these are built over.

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

The impact on small surrounding roads will just exacerbate problems caused by increased car numbers, through traffic from new A3 junctions and school runs.

Attached documents:

Comment: MM42 - LPMM18/4850  Respondent: Wendy Lodge 10775137  Agent:

I object to MM27, MM41, MM42 and MM48.

Traffic has increased considerably through Send Village in the past ten years. The extra traffic that is bound to clog the A247 from the new slip roads with the A3 will expose villagers to significantly increased pollution levels. Children walking to the local school already are subjected to this. Another 700 houses with, maybe, a further 1400 cars are not going to help. I do not believe GBC has looked at this in a sufficiently robust manner.

Attached documents:

Comment: MM44 - LPMM18/4843  Respondent: Wendy Lodge 10775137  Agent:

I object to MM44.

This is Green Belt land and development is contrary to MM9.

This is another proposal removed from earlier plans due to massive opposition and only reappeared in this latest Local Plan Examination.

It would add a further 200 plus cars to local traffic.

It adds to the 45% increase in houses in Send which will overwhelm our local services and change the character of the village.

Attached documents:

Comment: MM48 - LPMM18/4847  Respondent: Wendy Lodge 10775137  Agent:
I object to MM27, MM41, MM42 and MM48.

Traffic has increased considerably through Send Village in the past ten years. The extra traffic that is bound to clog the A247 from the new slip roads with the A3 will expose villagers to significantly increased pollution levels. Children walking to the local school already are subjected to this. Another 700 houses with, maybe, a further 1400 cars are not going to help. I do not believe GBC has looked at this in a sufficiently robust manner.

Attached documents:

Comment: MM9 - LPMM18/4841  Respondent: Wendy Lodge 10775137  Agent:

I object to MM9.

There is already clear guidance on development within green Belt land. It appears that GBC intends to use its own subjective method to allow unnecessary and damaging development within or adjoining existing village boundaries.

Attached documents:

Comment: Other comments - LPMM18/4855  Respondent: Wendy Lodge 10775137  Agent:

I object to GBC concentrating so much development in our village. A fair share of development, meeting the needs of the local population is one thing but this is so completely out of proportion one has to wonder why it is being put forward.

Attached documents:

Comment: MM27 - LPMM18/308  Respondent: Prue Robinson 10776033  Agent:

MM27,MM14, MM42 AND MM48 Transport Strategy

I object most strongly to The Transport Strategy

These are my reasons:

The traffic implications for Send of developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm, added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads.

GBC appear not to have carried proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road. It would be anticipated that thousands more cars will head to Woking every day. Imagine the increased noise levels, nitrogen dioxide pollution, horrendous delays and total gridlock!

Attached documents:
Main Modifications to MM41 Land at Garlick's Arch, Send Marsh, MM42 Land at Burnt Common, London Road, Send, MM44 Land at Alderton's Farm, Send Marsh Road, MM9 Green Belt Policy and MM27, MM41, MM42 and MM48 Transport Strategy, and Other Developments.

MM41 Land at Garlick's Arch, Send Marsh, Policy A43

I object most strongly to Policy A43

These are my reasons:

There have been 7,000 objections to the previous lower number (400) and they have all been ignored. And now there appears to be an increase of 37% in the number of houses proposed (550).

This is excessive. It is an outrageous increase from 400 to 550 homes and will cause an immense over-development of our village. The doctors' surgeries will not be able to cope with the demand from the proposed number of new residents, it is already difficult to get an appointment in the week that one phones the surgery requesting one. Also local schools, one of which has recently had a forced closure will not be able to offer places for the children from these new homes.

Crucially the additional traffic that your amended plans would generate will mean at least an additional 800 cars tipping out onto the already overloaded local roads. There are already noticeable rush hours here with stationary traffic and queues that stretch from Old Woking all the way to the M25, through both Send and Ripley villages. I am sure you must be aware of this current situation. Your changed plan would cause heavy traffic for many hours each day and totally gridlock all the roads in the whole area at least twice daily, if not three times including when local scrolls finish for the day at around 3pm.

Garlick's Arch is a permanent and lovely Green Belt piece of ancient woodland that has existed since the 16th century. The loss of this unique area of woodland is unthinkable and the fact that Ripley and Send will effectively be joined into one sprawling town utterly defeats the key purpose of Green Belt. Besides, this the area is subject to frequent flooding and has been given a 'flood zone 2' allocation. And added to this high risk of flooding there is accumulated lead shot in this particular area and it is therefore contaminated.

Attached documents:

MM27, MM41, MM42 AND MM48 Transport Strategy

I object most strongly to The Transport Strategy

These are my reasons:

The traffic implications for Send of developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm, added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clndon slip roads.

GBC appear not to have carried proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road. It would be anticipated that thousands more cars will head to Woking every day. Imagine the increased noise levels, nitrogen dioxide pollution, horrendous delays and total gridlock!

Attached documents:
### Comment: MM42 - LPMM18/305
**Respondent:** Prue Robinson 10776033  
**Agent:**

**MM42 Land at Burnt Common, London Road, Policy A58**

*I object most strongly to Policy A58*

These are my reasons:

This proposal has now grown from 7000 sq m to a minimum of 14,800 sq m of industrial and storage. This policy A58 was in fact deleted from the 2014 draft because of the number of objections and it is staggering not only that it has been re-instated but there is this horrendous doubling of area.

The industrial and warehouse areas at Slyfield and Guildford have empty sites and industrial units so your immense over allocation at Send, in a Green Belt area is incomprehensible to me. It is by far the largest new industrial allocation in any village in the borough. There are no special circumstances so it contradicts MM9 in fact the 'Employment Land Needs Assessment’ showed a reduction in demand for industrial land. This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village.

The impact on the narrow surrounding roads, already crowded with tail backs in rush hour periods would most certainly become gridlocked. Creating one mass of clogged roads in the entire area with over development will completely defeat the purpose of the Green Belt.

**Attached documents:**

### Comment: MM42 - LPMM18/310
**Respondent:** Prue Robinson 10776033  
**Agent:**

**MM27, MM14, MM42 AND MM48 Transport Strategy**

*I object most strongly to The Transport Strategy*

These are my reasons:

The traffic implications for Send of developments at Garlick's Arch, Burnt Common, Clockharn and Alderton's Farm, added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads.

GBC appear not to have carried proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road. It would be anticipated that thousands more cars will head to Woking every day. Imagine the increased noise levels, nitrogen dioxide pollution, horrendous delays and total gridlock!

**Attached documents:**

### Comment: MM44 - LPMM18/306
**Respondent:** Prue Robinson 10776033  
**Agent:**

**MM4 Land at Alderton's Farm, Send Marsh Road, Policy A63**

*I object most strongly to Policy A63*
These are my reasons:

A new site for 120 homes, including some self build has now been added to the list of housing developments in this area. This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July.

This area is a Green Belt site with no special circumstances so it also contradicts policy MM9. What exactly are the 'exceptional circumstances' you have claimed exist? Please would you clearly define these?

The proposed site will detract from the heritage buildings at Send Marsh Green and the additional traffic will increase the pressure on the Send crossroads. With Garlick's Arch (550 houses), Clockbarn (60 houses) and Winds Ridge (40 houses) this gives a total of 770 houses added to the 1700 currently in Send. This is an increase of 45% and is far too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/311  Respondent: Prue Robinson 10776033  Agent:

MM27,MM14, MM42 AND MM48 Transport Strategy

I object most strongly to The Transport Strategy

These are my reasons:

The traffic implications for Send of developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's Farm, added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads.

GBC appear not to have carried proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road. It would be anticipated that thousands more cars will head to Woking every day. Imagine the increased noise levels, nitrogen dioxide pollution, horrendous delays and total gridlock!

Attached documents:

Comment: MM9 - LPMM18/307  Respondent: Prue Robinson 10776033  Agent:

MM9 Green Belt

I object most strongly to the 'modifications' made to the Green Belt

These are my reasons:

Although the 'modifications' claim to protect the Green Belt except in very special circumstances, GBC make an exception for 'limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.'

This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.
Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers' site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of Send Business Centre - despite the Wey Conservation area.

Added to the other housing sites and an industrial space such heavy concentration in one village, which could be more evenly shared with 40, is totally unreasonable.

To me your proposals to build on Green Belt in the Send area are completely unacceptable. In fact it appears that GBC have not only not listened to the many thousands of locals' objections and points of view but appear set on making life worse for us all! To accomodate all that you would like to do there is absolutely an inadequate infrastructure. For example schools, medical facilities (as required by law), sewerage and drainage systems plus our already crowded roads. And this is aside from the planned decimation of ancient woodland and beautiful countryside enjoyed by so many.

To sum up, I find these latest proposals completely unacceptable.

Attached documents:

Comment: MM41 - LPMM18/638  Respondent: Donna Joyce 10781505  Agent:

To the decision makers at GBC

I write to you today to strongly object to the following proposals....

MM41 Land at Garlicks Arch, Send Marsh.

I have had the privilege to live in Send Marsh for 5 years now and have to say I have felt very lucky to live in a lovely village.

Having lived here for this amount of time I feel I have earned the right to object very very strongly to this proposed housing development!!!!

It is totally unacceptable to build on ancient woodland upsetting our wildlife, removing much needed trees to absorb CO2 (let's face it the A3 pumps out enough!!) If I were to ask to build on Green belt you would say NO! To me so I am as a tax payer saying NO to you!!!

The houses will not be affordable to the average hard working person because they will come under the "Ripley" postal code.

SEND MARSH HAS ENOUGH ISSUES WITH EXCESS WATER DURING SPELLS OF HEAVY RAIN!!!!!!!!!

More development in the local area will enhance this issue ten fold!!!
Council tax is very expensive in the Guildford Borough!!!!!! And not a great deal of service in return so how will the people that will supposedly inhabit these new builds even be able to pay a mortgage????

CONGESTION!! Total big issue in our lovely village there really is no room for an estimated 800 extra cars on our roads!!!! I am thinking anyone making decisions at GBC on our behalf cannot live where I do.....

Please STOP ignoring the people of Send Marsh and surrounding areas!!! WE DON'T WANT OR NEED THIS OVER DEVELOPMENT OF THE PLACE WE LIVE!!!!!!

Attached documents:

Comment: MM41 - LPMM18/693  Respondent: Donna Joyce 10781505  Agent:

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

Attached documents:

Comment: MM45 - LPMM18/4905  Respondent: Nathanael Aaronson 10781889  Agent:

The main focus of my response to the local plan is the proposed Main Modification MM45 relating to Policy A64.

I strongly object to this policy, on the grounds that it will destroy the open green space which currently demarcates a boundary between the settlements of Normandy and Flexford. At present, the settlement of Flexford has a boundary of the railway line, beyond which it does not extend. If the land to the north of the railway is built upon, it will pave the way for the in-filling of this buffer zone which currently keeps the settlements of Flexford and Normandy separate. This buffering is precisely the purpose of the Green Belt, so to built upon this land will be contrary to the whole ethos of the Green Belt. There is no exceptional circumstance which mitigates such a proposal, especially when considering that Guildford Borough Council has miscalculated and overestimated the number of homes that it needs to build - something that should be re-examined with consideration for the latest predictions for household formation from the ONS.

On top of these anthropocentric arguments, the land also forms an important wildlife corridor, through which animals can find a safe route to transit from the rural areas East of Flexford, through Pussey’s copse and the rural land to the West, connecting up many areas of local green space. If development goes ahead then this corridor will be destroyed, disrupting the existence of many of the animals that enrich the local landscape.

Furthermore, I have concerns about the traffic and infrastructure of Glaziers Lane - a lane which is categorised as a ‘D’ road, has persistent problems of subsidence, leading to poor quality of road surface, which is exacerbated by the heavy traffic flows that this road experiences at peak times. The railway bridge on Glaziers Lane is another point which is already problematic, and can only be made worse by the pressure of an extra 200 or so cars looking to enter or exit the proposed Policy A64 at peak times. This sort of development cannot be sustainable without additional investments in infrastructure such as traffic calming measures on the railway bridge. The extra traffic generated by the residents of proposed Policy A64 will also lead to a worsening of the already terrible traffic jams seen at the Normandy crossroads, and the Hogs Back junctions above Wanborough. This interchange with the A31 is already the site of nasty tailbacks, causing stop-start traffic jams on the steeply inclined roads on either side of the Hogs Back. This will surely be made even worse by the extra traffic, increasing the likelihood of accidents and decreasing quality of life for the local residents who have to suffer these jams! Whilst the developers hope to get permission for such sites on a rationale of their proximity to railway stations, its hard to imagine that any of these new residents will use the train to take their kids to
school or to do the weekly supermarket shop. Instead they are much more likely to do these things by car, meaning more cars on the local roads, and more strain on the road infrastructure.

In a similar vein, I have concerns about the sewerage systems here in Glaziers Lane. These are already heavily overloaded, which causes problems at the low point of the lane (where the road crosses the stream). I am worried about the effect that an extra 105 homes worth of excrement will have on these already overloaded systems, and so I again make the point that a development such as that which is proposed, cannot be sustainable without accompanying investments in local infrastructure.

Finally, I would like to draw attention to the fact that public opinion in the village seems to be overwhelmingly opposed to the proposed development of Policy A64, as was clear to anyone in attendance of the public meeting hosted by Normandy Parish Council and Normandy Action Group on the 2nd October. At this meeting it was concluded that the proposal will bring no tangible benefit to the village, instead only causing more problems of an extra burden on our already strained local services, such as Wyke School and the Glaziers Lane surgery, as well as local infrastructure, as I have already discussed.

In conclusion, I am concerned not just about the proposal for MM45 of Policy A64, I am concerned about the whole process of planning and development on Green Belt land, because it seems that not enough consideration is being given to the problems that will be caused by higher population on our local services, infrastructure and environment.

Thank you for giving us this chance to express our views as local residents, in a matter that has the potential to drastically affect the future of our village.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/240 **Respondent:** Moira Payne 10782241  **Agent:**

I would like to object to the following aspects of the local plan for the following reasons.

MM41 Land at Garlicks Arch. This is gross overdevelopment which would effectively join Ripley, Burnt Common and Send, thus destroying their individual identity.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/261 **Respondent:** Moira Payne 10782241  **Agent:**

I would like to object to the following aspects of the local plan for the following reasons.

I object to MM41 Land at Garlicks Arch. This is gross overdevelopment which would effectively join Ripley, Burnt Common and Send, thus destroying their individual identity. This is green belt land containing ancient woodland and 550 homes would cause massive strain on infrastructure and local services.

**Attached documents:**

---

**Comment:** MM42 - LPMM18/241 **Respondent:** Moira Payne 10782241  **Agent:**
MM42 Burnt Common industrial. There is no genuine established need for this development in the green belt which together with other proposals would destroy the nature of the rural area.

Attached documents:

Comment: MM42 - LPMM18/262  Respondent: Moira Payne 10782241  Agent:

I object to MM42 Burnt Common industrial. There is no genuine established need for this development in the green belt which together with other proposals would destroy the nature of the rural area. The narrow surrounding roads are not capable of supporting the extra traffic.

Attached documents:

Comment: MM44 - LPMM18/264  Respondent: Moira Payne 10782241  Agent:

I object to MM44 Aldertons Farm. It is a green belt site with no special circumstances contradicting policy MM9. Additional traffic could overload the already busy Send crossroads. Together with other proposals could create ‘gridlock in the village of Send.

Attached documents:

Comment: MM9 - LPMM18/242  Respondent: Moira Payne 10782241  Agent:

MM9 Green Belt. There has already been incursion into green belt areas and a policy change to make this easier would be very detrimental.

Attached documents:

Comment: MM9 - LPMM18/263  Respondent: Moira Payne 10782241  Agent:

I object to MM9 Green Belt. There has already been incursion into green belt areas and a policy change to make this easier would be very detrimental.

Attached documents:

Comment: MM2 - LPMM18/2616  Respondent: Timothy Croxford 10782433  Agent:

Having previously written to you about the original destructive plans drawn up to swamp Send under acres of concrete, desecrate the open green belt, overwhelm local roads, schools and medical facilities, it seems we must all object once again to the increased developments planned for this small village. There seems no point in quoting the MM reference numbers one by one as the entire plan to wipe out Send Village is completely and viciously aimed at creating as much mayhem in a relatively peaceful country village as it is possible to do.

Whilst everyone is aware of the need for affordable housing, building hundreds of homes under MM41 and MM44 in the area simply can't be coped with locally, and 14,800 square metres of industrial units/storage at Burnt Common MM42, is a crazy way to go about adding to the existing industrial units. There are much better ways of steadily introducing extra housing and industrial units into an area without causing a huge upheaval of clogged roads, infrastructure collapse, schools and medical units overcrowding - but this latest set of proposals seem to have totally ignored any idea of being sensible and working with the community to get the best possible options agreed. Send has just been the object of a complete planning overrule, by the look of the so-called plans, by sticking pins into a map on any piece of green land available.

When two schools merged in Send Village, the car parking was not even thought about, leaving hundreds of cars parked at angles all round the school entrance four times a day as parents jostle for somewhere to park their cars. One-car wide lanes are constantly seeing cars causing traffic jams, let alone the Medical Centre being used as a car park. Ripley School has been closed, so where does the planning committee think the increased number of children coming into the area are going to receive schooling? And how will the Medical Centre cope with thousands more patients? The answer is, of course, that it cannot be expected to. Planners just see the increase in revenue from building as much as possible on available land - Send has obviously come under the cosh simply because it is a small village surrounded by fields - the greed of Guildford Borough Council in putting forward these appalling plans is plain to see, despite the death of a small country village where people come to live for some peace and quiet in a rural atmosphere.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. Guildford Borough Council seem not to care a jot that these devastating plans will totally ruin a small Surrey village not too far outside of the county town. It seems that Send must be the target of the planners who decide where buildings will go whether or not it destroys people's living. As part of Send is not on mains drainage, another health issue comes to the fore, possibly also overlooked.

Five houses are currently newly-built and for sale within half a mile of our home - logistics and travel in the lanes can be dealt with on smaller numbers. The Guildford Borough Council plans are appalling for Send, there is no way the village can survive if they go ahead. We object in the strongest terms to the desecration of Send Village, to every one of the MM articles aimed at wiping out Send Village, and sincerely hope that Guildford Borough Council realise that their plans to overrun this small village, where we have lived for 22 years, are totally and utterly unacceptable to the people who live in Send.

Attached documents:

Comment: MM2 - LPMM18/5451  Respondent: Murray Dudgeon 10782689  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

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**Comment:** MM23 - LPMM18/5456  **Respondent:** Murray Dudgeon 10782689  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**
<table>
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<tr>
<th>Comment: MM3 - LPMM18/5452</th>
<th>Respondent: Murray Dudgeon 10782689</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM3 In (5) new town centre development should avoid adverse <strong>impact on surrounding residential</strong> areas.</td>
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<tr>
<td>MM3 There should be a policy (S4) on the urban areas beyond the town centre to <strong>prevent inappropriate garden grabbing</strong> and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.</td>
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<td><strong>1. The Guildford Vision Group’s Objections and Concerns Which I Share</strong></td>
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<tr>
<td>MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites</td>
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<td>MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre</td>
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<td>MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside</td>
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<th>Comment: MM31 - LPMM18/5459</th>
<th>Respondent: Murray Dudgeon 10782689</th>
<th>Agent:</th>
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<tr>
<td>MM31 on <strong>North Street</strong> should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.</td>
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<td>MM31 A height limit for <strong>North Street</strong> is required.</td>
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<td>MM31 There appears to be no allocation for an <strong>all-direction bus interchange</strong>.</td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment: MM32 - LPMM18/5455</th>
<th>Respondent: Murray Dudgeon 10782689</th>
<th>Agent:</th>
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<tr>
<td>MM32 A height limit for <strong>White Lion Walk</strong> is required.</td>
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<th>Comment: MM33 - LPMM18/5461</th>
<th>Respondent: Murray Dudgeon 10782689</th>
<th>Agent:</th>
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</table>
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

**Comment**: MM35 - LPMM18/5463  **Respondent**: Murray Dudgeon 10782689  **Agent**:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

**Comment**: MM41 - LPMM18/5464  **Respondent**: Murray Dudgeon 10782689  **Agent**:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

**Comment**: MM44 - LPMM18/5465  **Respondent**: Murray Dudgeon 10782689  **Agent**:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

**Comment**: MM9 - LPMM18/5453  **Respondent**: Murray Dudgeon 10782689  **Agent**:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Comment: MM27 - LPMM18/802  Respondent: Jane Baker 10784769  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications of the above developments plus those for nearby Gosden Hill and Wisley/Ockham have not been adequately addressed by GBC who has made no real assessment of the traffic situation as thousands of cars head down Send Barns Lane and Send Road towards Woking.

Attached documents:

Comment: MM41 - LPMM18/798  Respondent: Jane Baker 10784769  Agent:

Once more Guildford Borough Council, its Planning Committee and the Planning Inspector have completely disregarded the 33,000 objections made by local citizens to the original plan and have actually made the situation WORSE for Send.

It has also made sure that previous objections cannot be presented again, only the changes that have been made. Thus once again wiping out the entire 33,000 objections. Send now faces four new housing developments, a huge industrial warehouse complex, two new A3 slip roads and major grabbing of green belt land. Disgraceful and entirely UNDEMOCRATIC.

I therefore strongly object to the following:

MM41 Land at Garlick's Arch, Send Marsh, Policy A43

Now 550 homes.

An increase of 37% in the number of houses is excessive.

It ignores 7000 previous objections made by local people.

It is an ancient woodland that existed at the time of Elizabeth I.

It will join up Ripley and Send defeating the purpose of the Green Belt.

It is subject to frequent flooding and is currently flood zone 2 allocation.

It will generate excessive traffic onto already busy local roads in Send and Ripley.

At least 800 cars will block adjacent roads.

School and medical facilities will be strained to breaking point.

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications of the above developments plus those for nearby Gosden Hill and Wisley/Ockham have not been adequately addressed by GBC who has made no real assessment of the traffic situation as thousands of cars head down Send Barns Lane and Send Road towards Woking.

Attached documents:

Comment: MM42 - LPMM18/799  Respondent: Jane Baker 10784769  Agent:
MM42 Land at Burnt Common, London Road, Policy A58

Now a NEW allocation more than doubling the original 7000 sq m. of industrial warehousing to 14,800 sq ft

I object to policy A58 at Burnt Common because:

It was DELETED from the first draft because of all the previous objections and should therefore NOT have been reintroduced.

There is no need to build an industrial development on Green Belt when sites still exist at Slyfield.

It is by far the largest new industrial allocation in any village in the borough.

The impact on already busy roads will cause gridlock, especially when the A3 is blocked and traffic tries to get down the slip road and through Ripley and Send

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications of the above developments plus those for nearby Gosden Hill and Wisley/Ockham have not been adequately addressed by GBC who has made no real assessment of the traffic situation as thousands of cars head down Send Barns Lane and Send Road towards Woking.

Attached documents:

Comment: MM44 - LPMM18/800  Respondent: Jane Baker 10784769  Agent:

I object to MM44 Land at Aldertons Farm, Send Marsh Road Policy A63

New site for 120 Homes including some self build

This was deleted from an earlier draft due to objections and not-reinserted until the public examination in July.

It is Green Belt with no special circumstances and so contradicts policy MM9.

Additional traffic will increase pressure on Send crossroads.

It will detract from heritage buildings at Send Marsh green.

Together with developments at Garlicks Arch, Clockharn, and Winds Ridge, it means an additional 770 houses will be added to the 1700 currently in Send, an increase of 45%. Too much for the infrastructure.

Attached documents:

Comment: MM48 - LPMM18/805  Respondent: Jane Baker 10784769  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications of the above developments plus those for nearby Gosden Hill and Wisley/Ockham have not been adequately addressed by GBC who has made no real assessment of the traffic situation as thousands of cars head down Send Barns Lane and Send Road towards Woking.

**Attached documents:**

**Comment:** MM9 - LPMM18/801 **Respondent:** Jane Baker 10784769 **Agent:**

**MM9 Green Belt Policy**

This policy introduces a subjective test which means any land on the edge of Send village could be picked off for development. An open invitation to developers and speculators at the expense of residents. With Send and Ripley being targeted for exclusion from the Green Belt, this makes a mockery of the so-called Green Belt Policy.

**Attached documents:**

**Comment:** Other comments - LPMM18/806 **Respondent:** Jane Baker 10784769 **Agent:**

**General Impact**

I object to all the above because of the numbers of housing and industrial sites being planned. We do not have adequate schools, doctors, or roads to manage this enormous increase. Our local roads are already clogged during rush hour.

I am certain that the Planning Inspector has no idea of the environs around Send, otherwise he would have never supported and INCREASED the planned numbers of houses and Industrial space.

Nor do I think that members of the Planning Committee live anywhere near Send or Ripley and that their own wards are not being subjected this wholly unnecessary Local Plan of destruction of both our village enviroment and the precious Green Belt. We recognise the need for new housing, but not on such a ruinous scale.

The whole process involving Guildford Borough, the Planning Committee and the Planning Inspector shows that democracy is dead in the county.

Shame on you.

**Attached documents:**

**Comment:** MM42 - LPMM18/370 **Respondent:** Timothy Goodman 10790145 **Agent:**

I object to your proposal for industrial planning allocation for this site.

There is no proven need for more industrial space, and the consequent increase in HGV traffic will be imposed upon the already narrow roads of Ripley, Send, and Clandon.

There appears to be no allowance for the associated transport infrastructure in your plan.
I would however approve of the site being used for affordable housing, which surely should be one of the council’s priorities, or if necessary as an alternative travellers site.

Attached documents:

Comment: MM41 - LPMM18/2222  Respondent: Norman Carpenter 10793697  Agent:

I OBJECT to the following propositions in the latest Guildford Local Plan 2018

MM41 Garlicks Arch

The original idea of this site was flawed and it is amazing you have re-inserted with EXTRA houses. As an ex-resident of the "Wisley Estate" (21 years I suffered the devastation of 2 floods and the effect of the proposal will guarantee further flooding. The effect of 800+ extra cars will cause further blockage to adjacent roads. The local school and medical facilities are already overloaded.

Attached documents:

Comment: MM42 - LPMM18/2223  Respondent: Norman Carpenter 10793697  Agent:

MM42 Land at BURNT COMMON

Any industrial building in this area will result in many extra large vehicles [unreadable text] on to the Old Portsmouth Road and [unreadable text] on to the SLIP-ROAD from the A3. But [unreadable text] through the [unreadable text] of SEND and RIPLEY, Nitrogen Oxide levels will be further increased.

Attached documents:

Comment: MM44 - LPMM18/2224  Respondent: Norman Carpenter 10793697  Agent:

MM44 Land at ALDERTON'S FARM

As in the previous 2 objections the main campaign is the excess of 250+ extra cars on to in this case a narrow Sendmarsh Road and have through Sendmarsh on to SEND CROSSROADS. The latter has an [unreadable text] and [unreadable text] twice a day.

All these 770 houses planned are to be added to the existing 1700 in Send. This is far too much for our infrastructure.

Attached documents:

Comment: MM45 - LPMM18/2100  Respondent: Valerie A Chant 10795553  Agent:
Having just returned from holiday I have no time to compose a long letter, to meet the deadline I have only time to list my objections to your plans for Normandy, Glaziers Lane.

1) You have **NOT** spelt out **EXCEPTIONAL?** circumstances required to re-draw the Green Belt boundary in Normandy.

2) Previous planning applications on this site have stressed the extreme sensitivity of this site.

3) The sustainability of this site - it is the smallest and most rural

4) The road + sewage systems in Normandy are already overloaded and cannot support more development.

The proposal development would have a detrimental effect on the Surrey Hills area of Natural Beauty.

When 'The Paddocks' was built some 40 years ago permission was sought to build twice as many houses, the Council at that time refused permission on the grounds that there would be too much traffic generated - how right they were.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/1781</th>
<th>Respondent: Neal Basson 10799169</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The current version of the Plan has increased the number of houses from 12,426 to 12,600.</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

On 20th September the Office of National Statistics (ONS) released new household growth projections for Guildford for the Plan period. The new figures reduced the projected growth in households from 11,142 (that applied to the previous version of the Plan) to 6,635; a reduction of 4,507 households (40.5% reduction). This change was no surprise; in May 2018 ONS had already released their population projections that clearly foreshadowed a substantial drop in the household projection.

Due to these very large discrepancies between the Plan and the up-to-date ONS household data, the Public Examination of the Plan by the Planning Inspector must be re-opened.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM13 - LPMM18/5495</th>
<th>Respondent: Guildford Greenbelt Group (Susan Parker) 10799425</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MM13 retail needs</strong></td>
<td></td>
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</tbody>
</table>

The retail needs figures are revised to show an increase in net capacity to 2030 of 28,202 m². This is hopelessly optimistic given retail trends, in particular the increases in online shopping. They risk therefore sterilising land with unrealistic allocations and demands. The retail requirements should therefore be reduced.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5490</th>
<th>Respondent: Guildford Greenbelt Group (Susan Parker) 10799425</th>
<th>Agent:</th>
</tr>
</thead>
</table>
Main modifications to Guildford Local Plan.

We understand that a main modification may only be made if the plan as submitted is unsound. Modifications should only be required to make it sound.

MM2 Spatial development strategy and housing numbers

This is fundamental to the whole plan, and sufficiently important that we consider the housing requirements render the whole plan unsound.

The housing requirement should be calculated from the starting point of the latest, September 2018, ONS projections rather than the projections released earlier in 2018. These indicate a projected population increase of 301 dwellings per annum. Given the environmental constraints in this area, we consider that the OAN target should therefore, in our opinion, be set at a figure in the region of 301 dwellings per annum, ie the same as the ONS perception of need, and this totals 5728 over the plan period.

As set out in MM2:
Commitments (permissions/completions) total 3675
LAA sites not allocated total 620
Windfall sites total 750

This aggregates to a total of commitments, LAA sites and windfalls of 5045.

Assuming that the target is set at (say) 6000 (rounding up to the nearest thousand), we consider that the uplift of 955 can be met within the urban area on existing brownfield sites. Spacial distribution of proposed allocations to urban areas is already set at 863 for Guildford Town centre and 1443 for urban areas. Even this would seem to be theoretical oversupply, but it certainly makes it clear that there are no exceptional circumstances for release of Green Belt.

This reduces the case for Green Belt releases in the local plan even if a slightly higher number is adopted. No exceptional circumstances have been demonstrated to support release of any of the Green Belt (or indeed countryside) sites, especially since (per new policy S3) it is clear that the brownfield land within the urban area should be used as a matter of priority.

We cannot see that these numbers demonstrate any form of justification for the release of any new Green Belt or rural sites.

We note that the Inspector has sought the Council’s views on those ONS figures (ID/10), but given their significance ought to be asking the examination participants more generally for their views.

We also consider the retail requirements are unrealistically high, in particular for comparison shopping. More urban land is therefore available for housing development. The housing numbers proposed for the town centre of 863 are considerably below what the town centre is able to accommodate. By increasing pressure on the Green Belt the plan is unsound as not being consistent with national policy. The Town Centre housing figures should be increased to a minimum of 955 (assuming that the total target of 6000 is accepted) and policies put in place to manage that growth.

Attached documents:
The important expectations on developments of 25 dwellings or more in D1(2) are removed without any justification. The submitted text provided a series of requirements which met the social dimension of sustainable development in national policy.

The replacement text is less precise, for example, on community interaction, walking distances, active lifestyles, routes to nearby areas for pedestrians and cyclists.

**MM23 D1 para13-15 Masterplan**

The masterplans proposed suffer from two main defects:

(i) They are produced by and approved by the developer. They do not have the status of supplementary planning documents or other local development documents and are not approved by the local planning authority. If the Council does not agree with them, it can do nothing. Notwithstanding that, para 17 requires planning applications to be consistent with the masterplans, so in those respects is determining the acceptability of the developer’s own application on its compliance with the developer’s own masterplan.

(ii) The masterplans are required to respond to very vague criteria in para 16. Those are much less precise and useful than the expectations in the submitted D1(2). Almost any scheme could, in a developer’s eyes, meet para 16, even if it was a failure.

**Policy D4 Deletion**

The submitted policy D4 is sound and there is no rational basis upon which it could be unsound. No amendment is therefore justified.

Whilst some elements are incorporated into the main modifications for D1, other details such as (1)(d) ‘e street patterns, spaces around buildings, layout, grain, scale, massing, proportions, height and materials of surrounding buildings’ are omitted from the proposed text.

**Attached documents:**

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**Comment:** MM3 - LPMM18/5491  **Respondent:** Guildford Greenbelt Group (Susan Parker) 10799425  **Agent:**

**MM3 New Policy S3 - Delivery of development and regeneration with Guildford Town Centre**

We welcome this new policy. There are few changes to the Local Plan that we regard positively, but this change is one that we have been requesting for at least 5 years, since the original Issues and Options consultation. We need more concentration of development in the urban area; more efficient use of land; and emphasis on brownfield and urban development as a priority. Having introduced this policy, it is lamentable that the new proposed additional developments are all on green fields, within the Green Belt, and do not implement this policy. What is the point of a policy if it is just theoretical?

Given the falling trends in relation to retail, we consider that the best way of regenerating the urban area within Guildford, especially some of the semi-derelict areas around North Street, is to build high quality residential areas. This is considered deliverable within the early part of the plan period since so many of the areas are within the LAA control.

**Attached documents:**
MM36 Blackwell Farm

GGG objects to the following modification within Policy A26:

○ The increase in employment space on the Surrey Research Park in Allocation paragraph 3 from 30,000m² to 35,000m². Whilst the PC welcomes densification of development in the right areas, any increase in office space at this particular location would attract additional traffic and put pressure on a junction that would already be over capacity. GGG welcomes the changes to the new ‘Opportunities’ item (4) in the Main Modifications to Policy A26.

Attached documents:

Comment: MM37 - LPMM18/5502  Respondent: Guildford Greenbelt Group (Susan Parker) 10799425  Agent:

MM37 Blackwell Farm Access road

GGG objects to the addition of Policy A26A (Blackwell Farm Access Road).

No one has advocated the use in any way of the existing Down Place access road for the new access road to Blackwell Farm, because it is too steep for the purpose, and is bounded on both sides by trees which should not be removed for road-widening because they contribute greatly to the landscape and have historic interest. Proposals did suggest crossing this access road at some point, but were otherwise presented as solutions that specifically avoided damage to the existing Down Place. It is therefore inappropriate now to include the option of using Down Place. The proposed Main Modification Policy A26a Requirement 2 should therefore be reworded to read: “The access road will be a new road which avoids the line of the existing Down Place and its associated tree belts.”

The revised land allocation for the link road between Blackwell Farm and the A31, shown in the mapped part of proposed Main Modification in new Policy A26a, is substantially different from the options presented in writing and orally to the Examination. In particular there is no justification for a land allocation for the road on the north-east side of Down Place on the steeply-rising ground on the A31 side of the sharp bend in Down Place (ie above the 120m AOD contour). There were no proposals considered at the Examination which would have involved road building in this area, or a junction with the A31 taking land north-east of Down Place. The allocated area of search for the new road on the principal slope should be amended so that it is confined to land south west of Down Place, and additionally be set back from Down Place to avoid damage to the tree belt alongside this road.

GGG objects to the inclusion of policy A26a (access road to the Blackwell Farm development site) as a separate policy to the Policy A26 (the Blackwell Farm allocation). The separation should not be allowed to proceed because the submitted Plan is clear that the Blackwell Farm development cannot proceed without the link road, so the two parts of the scheme are completely linked and separation is entirely unnecessary: if a solution to the link road problem cannot be found, then Blackwell Farm itself cannot be developed; The separation would give the impression that the Blackwell Farm development was entirely outside the Area of Outstanding Natural Beauty, whereas it is 100% dependent on the link road through the AONB; By separating off the link road, the Plan would enable significant parts of the development to proceed without that element of the package: that was not what the submitted Plan proposed.

Attached documents:

Comment: MM40 - LPMM18/5514  Respondent: Guildford Greenbelt Group (Susan Parker) 10799425  Agent:

MM47 Map Amending SNCI Former Wisley Airfield
The amendment drastically reduces the size of the site of nature conservation importance at the Former Wisley Airfield. However the ecological interest of the land still merits SNCI designation. The published SNCI designation is sound and there is no justification for changing it.

The change appears to be to facilitate the new settlement. However SNCI designation depends upon the merits of the land rather than desires to develop it. Policy ID4(6) sets out the test to be applied to weigh any benefits of a scheme against the harm to a SNCI. It is not there to be bypassed by the removal of SNCI designations because land is allocated for development or SANG.

**MM40 Quality requirements for FWA**

Apart from the wastewater requirements, the changes lack any rationale or benefit. The condition of the SNCI will be inevitably compromised by the development itself. Moving references to unique places and unique context from opportunities to requirements is no doubt intended to strength the expectations, but involves turning a very vague expectation into a similarly vague requirement.

**Attached documents:**

**Comment:** MM41 - LPMM18/5505  **Respondent:** Guildford Greenbelt Group (Susan Parker) 10799425  **Agent:**

**MM41 – land at Garlicks’ Arch, Send March Policy A43**

This has increased from 400 to 550 homes, of which 450 are to be built in the first 5 years.

This increase of 37% in the number of homes is excessive. 7000 objections to the previous proposal have been ignored.

This is Green Belt and includes Ancient Woodland, which should have protected status under both the previous and current NPPFs.

This will join the communities of Send and Ripley, and thereby breach one of the key functions of GreenBelt.

The site is not suitable for housing: it is subject to frequent flooding and is contaminated by lead shot.

At least 800 extra cars will block adjacent roads, and school and medical facilities will not cope.

**Attached documents:**

**Comment:** MM41 - LPMM18/5508  **Respondent:** Guildford Greenbelt Group (Susan Parker) 10799425  **Agent:**

**MM41 Transport Strategy**

The Local Plan is proceeding with inadequate traffic modelling that understates the roads infrastructure requirements that will be generated by its excessive housing number and site selection.

**Attached documents:**
Comment: MM42 - LPMM18/5507  Respondent: Guildford Greenbelt Group (Susan Parker) 10799425  Agent:

**MM42 Land at Burnt Common**

Increased from 7000 to 14800 sq m of industrial and storage – this has been increased twice, having been previously deleted from the 2014 plan. It has now doubled the area. It is by far the largest new industrial allocation in any village. There is unused industrial capacity at Slyfield so there is no need to site development land in the Green Belt. The Employment Land Needs Assessment showed a reduction in demand for industrial land, and this allocation is on top of a 25% increase at Send Business Centre. There is more concentration of industrial units in Send than in any other village. The narrow village roads will not cope and this will affect air quality adversely.

Attached documents:

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Comment: MM43 - LPMM18/5510  Respondent: Guildford Greenbelt Group (Susan Parker) 10799425  Agent:

**MM43 Land at Hornhatch Farm Chilworth**

This land is currently on the edge of the AONB and is within Green Belt and outside the settlement boundary. It is critical in preventing urban sprawl from Guildford into the AONB. There is negligible differentiation between Shalford and Guildford itself and these fields are critical in ensuring that Shalford is differentiated from Chilworth. In an area as fragile as this, this is a critical incursion into very precious open space. It affects views into and out of the AONB and is not a suitable site. This land has not featured in any previous public consultation and therefore is unsuitable for inclusion at this stage.

Attached documents:

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Comment: MM44 - LPMM18/5511  Respondent: Guildford Greenbelt Group (Susan Parker) 10799425  Agent:

**MM44 Site at Aldertons’ Farm Send Marsh Road**

This new site for 120 homes was deleted from an earlier draft. It is a Green Belt site and no exceptional circumstances have been demonstrated; it will increase traffic, detract from heritage buildings and adds still more homes to the already inflated additions for Send (an increase of 45% for the village as a whole).

Attached documents:

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Comment: MM45 - LPMM18/5512  Respondent: Guildford Greenbelt Group (Susan Parker) 10799425  Agent:

**MM45 Land between Glaziers Lane and Strawberry Farm, Flexford**

This new site for 105 homes in red-rated Green Belt has not featured in any previous public consultation on the Local Plan. It would increase by 7% the number of dwellings in Normandy Parish, and would place considerable strain on an already inadequate road and sewerage infrastructure in Glaziers Lane. By extending the Flexford settlement boundary north of the natural break of the railway line it would also start to eat into the open space between the distinct settlements of Normandy and Flexford, and damage the openness of the Green Belt in this area. In addition to the sensitivity of the
site itself no “exceptional circumstances” have been demonstrated that would justify removing it from the Green Belt. There are also serious doubts about the ability of the site to deliver houses early in the Plan period, which is the sole justification for its inclusion at this late stage.

**Attached documents:**

**Comment:** MM7 - LPMM18/5493  **Respondent:** Guildford Greenbelt Group (Susan Parker) 10799425  **Agent:**

**MM7**

We have concerns about allowing market housing into rural exception site allocations; this is effectively a Trojan horse permitting anything to be built anywhere, and we do not consider that this should be implemented.

**Attached documents:**

**Comment:** MM9 - LPMM18/5494  **Respondent:** Guildford Greenbelt Group (Susan Parker) 10799425  **Agent:**

**MM9 Limited infilling impact on Ockham**

The modification is a weakening of the protection of the countryside, changing the site being ‘as a matter of fact within the village’ to ‘should be considered to be’.

In the context of a very diffused settlement such as Ockham, it is difficult to identify what is within the village at present, let alone what should be considered to be. The proposed modification would bring an uncertain, but potentially large, area into possible ‘infill’

**MM9 Green Belt policy**

Despite the apparent policy that the Green Belt will be protected, we consider that this is not being implemented in practice. Given that the modifications include substantial additional settlements in GB, SNCI removal, that all the key sites have been found sound, that insetting is being permitted (which will remove wildlife corridors as large gardens are developed) it seems that the Local Plan sees our wildlife and biodiversity as an obstacle to be swept aside. This is not in either the spirit or the letter of the rules as proposed by the NPPF.

**Attached documents:**

**Comment:** MM41 - LPMM18/52  **Respondent:** Shai Sinai 10799489  **Agent:**

I am writing to object to the Guildford Local Plan for the following reasons;

**MM41 Garlicks Arch ;**

I live opposite this site which is on GREEN BELT LAND containing ancient woodland and prime agricultural land of which little is left in Surrey. 7000 previous objections have been completely ignored alienating local residents from the council. This lovely land forms a break in continuity between Ripley and Send and a buffer to the blight of ribbon development. The sight floods regularly and is wholly unsuitable for development due to the extra pressure this vast
development will put on local services. Congestion and pollution and the huge increase in population will destroy our community. I object most strongly to MM41.

Attached documents:

Comment: MM42 - LPMM18/53  Respondent: Shai Sinai 10799489  Agent:

MM42 London rd;

I did not object to the initial smaller planned development of this land. However since 2014 the proposed development has doubled in size after previously being deleted. There is absolutely no need for a development of this size when Slyfield has unused capacity and Send Business Centre is being expanded. The Employment Land Needs Assessment showed a reduction in the need for industrial land. Once again a development not needed adding to congestion and pollution destroying our communities. Send is being disproportionately targeted for over development whilst contradicting MM9. I strongly object to MM42.

Attached documents:

Comment: MM44 - LPMM18/54  Respondent: Shai Sinai 10799489  Agent:

MM44 Aldertons Farm;

This is GREEN BELT LAND and previously deleted due to objections, but once again residents are being ignored. Send Marsh is a lovely heritage site around the green and this will be ruined. Another 120 homes here along with the other proposed developments will add 770 houses increasing area village by 45% this is wholly disproportionate. Again this will increase the strain on local services to breaking point. Congestion and pollution blighting our lives. I strongly object to MM44.

Attached documents:

Comment: MM9 - LPMM18/55  Respondent: Shai Sinai 10799489  Agent:

MM9: Green Belt Policy;

"limited infilling outside the identified settlement boundaries where it can be demonstrated that the site can be considered to be within the village." This sounds good but GBC is using the subjectivity of this for a land grab. A golden opportunity for developers and speculators at the expense of local residents betrayed by their own council. Shame on them!

Attached documents:

Comment: MM2 - LPMM18/5415  Respondent: Roger Harrison 10802177  Agent:
I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

I would like the Inspector to RE-EXAMINE the Local Plan because:
1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph.
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park.
5. The narrowness of the road near Summers.
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement.
7. The sharp bend near Clandon Regis.
8. The narrowness of the road at the Bull’s Head.
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school.
10. The sharp bend with poor sight lines in either direction at the church.
11. No continuous footpath through the length of the village.
12. The speed of traffic.
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPM18/5425  Respondent: Roger Harrison 10802177  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.
The Plan is unsound and should be re-examined.

Attached documents:

**Comment: MM3 - LPMM18/5419  Respondent: Roger Harrison 10802177  Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

**Comment: MM31 - LPMM18/5426  Respondent: Roger Harrison 10802177  Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

Attached documents:

**Comment: MM32 - LPMM18/5428  Respondent: Roger Harrison 10802177  Agent:**
MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

**Comment:** MM33 - LPMM18/5429  **Respondent:** Roger Harrison 10802177  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

**Comment:** MM35 - LPMM18/5430  **Respondent:** Roger Harrison 10802177  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

**Comment:** MM41 - LPMM18/5431  **Respondent:** Roger Harrison 10802177  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded

**Attached documents:**

**Comment:** MM44 - LPMM18/5432  **Respondent:** Roger Harrison 10802177  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

**Comment:** MM9 - LPMM18/5421  **Respondent:** Roger Harrison 10802177  **Agent:**


MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM2 - LPMM18/2463  **Respondent:** Lorraine Elliott 10803105  **Agent:**

I wish to object to the above on the following grounds:

- ONS data and therefore planning assumptions for housing has changed radically since the plan was first created. The plan now needs to be revised in line with the correct planning assumptions. Not to do this would be egregious and would easily be challenged. Make the plan on the best information available not the worst.

- Inclusion of Three Farms Meadows in plan. The SOS has made it perfectly clear that this is an unsuitable site for development. This is principally because it is in a totally unsustainable location with very poor transport links, and the adverse affect on the AONB, the local community, and all the other reasons that he gave in his judgment. So why is it still included? Please remove it and find somewhere more suitable to meet the local housing need. The fact that it has not already been removed is somewhat suspicious. Other sites have now been added so Three Farms Meadows can now be removed.

**Attached documents:**

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**Comment:** MM2 - LPMM18/689  **Respondent:** Steve Green 10803361  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock.

**Other developments**

- The travellers’ site on Send Hill will exacerbate all the problems mentioned above and make the overall impact on Send significantly detrimental to all those living in this part of the world.

I would be most grateful if you could take into consideration all my views listed above. Many thanks.

**Attached documents:**

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**Comment:** MM27 - LPMM18/685  **Respondent:** Steve Green 10803361  **Agent:**

**Regarding MM27, MM41, MM42 and MM48 Transport Strategy**

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock.
I hope you are well. I am writing to object to the modifications resulting from the Planning Inspector’s Report impacting the village of Send within Guildford Borough. Overall, the danger is that, if the proposals / modifications go ahead, Send will be transformed in such a way that its village identity will be permanently destroyed. Linked to this, there will be significantly increased congestion, pollution and resulting damage to the environment. This will impact residents both in Guildford Borough and beyond.

Specifically, I object to Main Modification 41 (Land at Garlick’s Arch, Send Marsh, Policy A43) because:

- An increase of 37% in the number of houses will destroy the village identity
- It ignores 7,000 objections already lodged
- It is Green Belt containing ancient woodland
- It will join up two separate villages (Send and Ripley) without sufficient school places with the recent closure of Ripley Primary school and no extra capacity at Send Primary school
- The site is subject to frequent flooding (a flood zone 2 area) and contamination by lead shot
- The extra cars will block up the adjacent roads and increase air pollution of carbon monoxide, nitrogen monoxide and nitrogen dioxide
- Medical facilities will be unable to cope with the increased demand

I object to MM27, MM41, MM42 and MM48 Transport Strategy

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock.

I object to MM42 (Land at Burnt Common, London Road, Send A58) because:

- It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan
- With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East.
- The concentration in Send is more severe than any other part of the Guildford Borough. This seems unfair
- The industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not the proposed huge allocation of over 10 hectares at Send – and in the Green Belt
Once again, the impact on congestion will be significant as will Nitrogen dioxide levels causing potential damage to health.

Regarding MM27, MM41, MM42 and MM48 Transport Strategy

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock.

I object to MM44 (Land at Alderton’s Farm, Send Marsh Road Policy A 63):

- It is a Green Belt site with no special circumstances so it contradicts MM9
- The additional traffic will increase pressure on Send Crossroads. Living at these crossroads, I can testify to the fact that it is very difficult to get out of our drive at rush hour as traffic is tailed back to the A3. Once again, air pollution affects our garden and environs.

Regarding MM27, MM41, MM42 and MM48 Transport Strategy

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock.

I am concerned about MM9 Green Belt policy

- This introduces a very subjective test and actually negates Green Belt policy. Speculators may be able to ‘pick off’ land at the edge of the village.
Attached documents:

Comment: MM27 - LPMM18/1180  Respondent: Mr Robert Mote 10805537  Agent:

I object to this revised proposal.

In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

This does not seem to show any evidence of a proper and full impact assessment of the combined / aggregated traffic increases that will affect Send Barnes Lane, Send Road and Old Portsmouth Road.

The impact on Send (and by implication Ripley and Clandon) of this apparent lack of clear assessment of the Garlick's Arch, Burnt Common, Clockbarn and Alderton's proposals is extremely worrying for the existing residents.

The likely impacts of the new proposals are at least significant increases on NOx levels, thereby affecting health, and increases in traffic congestion. It is not too far to believe an increase in motor accidents will also result.

Attached documents:

Comment: MM27 - LPMM18/1301  Respondent: Mr Robert Mote 10805537  Agent: MM27 and MM48

I object to this revised proposal.

In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

This does not seem to show any evidence of a proper and full impact assessment of the combined / aggregated traffic increases that will affect Send Barnes Lane, Send Road and Old Portsmouth Road.

The impact on Send (and by implication Ripley and Clandon) of this apparent lack of clear assessment of the Garlick's Arch, Burnt Common, Clockbarn and Alderton's proposals is extremely worrying for the existing residents.

The likely impacts of the new proposals are at least significant increases on NOx levels, thereby affecting health, and increases in traffic congestion. It is not too far to believe an increase in motor accidents will also result.

Attached documents:

Comment: MM41 - LPMM18/1178  Respondent: Mr Robert Mote 10805537  Agent:

I object to this revised proposal.
In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

In fact this MM represents an increase of 37% over the previous proposal, which in itself was excessive. The revised number of houses clearly constitutes an over-development, and is likely to result in a merging of Ripley and Send.

The impact on Green Belt will be even worse than previously documented, having an even greater impact on known ancient woodland.

Whilst the modifications stated suggest mitigations for the significant additional traffic from the permanent (residents) and temporary (construction) sources, it is impossible to believe these will be effective given the existing limitations of roads / house / etc. Therefore this excessive development will have a serious and detrimental impact on existing residents and their lives.

No mention has been made of mitigations for the increased residents on local facilities (doctors, school, etc). This suggests inadequate thought and investigations.

Attached documents:

Comment: MM41 - LPMM18/1299  Respondent: Mr Robert Mote 10805537  Agent:

I object to this revised proposal.

In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

In fact this MM represents an increase of 37% over the previous proposal, which in itself was excessive. The revised number of houses clearly constitutes an over-development, and is likely to result in a merging of Ripley and Send.

The impact on Green Belt will be even worse than previously documented, having an even greater impact on known ancient woodland.

Whilst the modifications stated suggest mitigations for the significant additional traffic from the permanent (residents) and temporary (construction) sources, it is impossible to believe these will be effective given the existing limitations of roads / house / etc. Therefore, this excessive development will have a serious and detrimental impact on existing residents and their lives.

No mention has been made of mitigations for the increased residents on local facilities (doctors, school, etc). This suggests inadequate thought and investigations.

Attached documents:

Comment: MM42 - LPMM18/1179  Respondent: Mr Robert Mote 10805537  Agent:

I object to this revised proposal.
In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

The indecision of this plan, being removed from the 2014 Plan, subsequently reintroduced and increased twice, suggests a complete lack of clear planning justification - it rather seems like arbitrary decisions have been made. The current plan for a minimum of 14,800 SqM is excessive and when coupled with MM41 will add unsustainable pressure on roads and facilities.

The increase in road traffic alone will add significant risk to existing residents health due to increase NOx levels, already at high levels

The choice of this site is a complete denial of both the need to preserve valuable Green Belt and the availability of existing industrial site development opportunities, for example Slyfield.

No special circumstances exist to justify this MM and it seems to be in contradiction to MM9. Infact the Employment Land Needs Assessment showed a reduced demand for industrial land.

**Attached documents:**

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**Comment:** MM42 - LPMM18/1300 **Respondent:** Mr Robert Mote 10805537 **Agent:**

**MM42**

I object to this revised proposal.

In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

The indecision of this plan, being removed from the 2014 Plan, subsequently reintroduced and increased twice, suggests a complete lack of clear planning justification - it rather seems like arbitrary decisions have been made. The current plan for a minimum of 14,800 SqM is excessive and when coupled with MM41 will add unsustainable pressure on roads and facilities.

The increase in road traffic alone will add significant risk to existing residents health due to increase NOx levels, already at high levels

The choice of this site is a complete denial of both the need to preserve valuable Green Belt and the availability of existing industrial site development opportunities, for example Slyfield.

No special circumstances exist to justify this MM and it seems to be in contradiction to MM9. Infact the Employment Land Needs Assessment showed a reduced demand for industrial land.

**Attached documents:**

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**Comment:** MM48 - LPMM18/1181 **Respondent:** Mr Robert Mote 10805537 **Agent:**

I object to this revised proposal.
In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

This does not seem to show any evidence of a proper and full impact assessment of the combined / aggregated traffic increases that will affect Send Barnes Lane, Send Road and Old Portsmouth Road.

The impact on Send (and by implication Ripley and Clandon) of this apparent lack of clear assessment of the Garlick's Arch, Burnt Common, Clockbarn and Alderton's proposals is extremely worrying for the existing residents.

The likely impacts of the new proposals are at least significant increases on NOx levels, thereby affecting health, and increases in traffic congestion. It is not too far to believe an increase in motor accidents will also result.

**Attached documents:**

**Comment:** MM48 - LPMM18/1302  **Respondent:** Mr Robert Mote 10805537  **Agent:**

**MM27 and MM48**

I object to this revised proposal.

In common with many of these Main Modifications, no notice or understanding of the previous 7000plus objections has can be seen.

This does not seem to show any evidence of a proper and full impact assessment of the combined / aggregated traffic increases that will affect Send Barnes Lane, Send Road and Old Portsmouth Road.

The impact on Send (and by implication Ripley and Clandon) of this apparent lack of clear assessment of the Garlick's Arch, Burnt Common, Clockbarn and Alderton's proposals is extremely worrying for the existing residents.

The likely impacts of the new proposals are at least significant increases on NOx levels, thereby affecting health, and increases in traffic congestion. It is not too far to believe an increase in motor accidents will also result.

**Attached documents:**

**Comment:** MM2 - LPMM18/3362  **Respondent:** Jean Bruton 10805793  **Agent:**

I maintain my objections to the Guildford Local Plan although I was not informed of this consultation. It seems likely therefore that many other objectors have not been informed of this consultation.

I agree with the representations made by the Wisley Action Group and believe the decisions regarding the unsuitability of this site for development and housing made by the Inspector and by the Secretary of State should be respected.

I support representations made by the Guildford Green Belt Group and by the wisely Action Group.

MM2 the housing calculation is based on out of date figures.

Woking's unmet need is not Guildford's responsibility.
Guildford Borough Council should focus on development in the town centre, urban areas and brownfield land BEFORE development in villages and Green Belt.

Comment: MM27 - LPMM18/3364  Respondent: Jean Bruton 10805793  Agent:
Traffic is already excessive.

Comment: MM3 - LPMM18/3363  Respondent: Jean Bruton 10805793  Agent:
There is a reducing need for retail development.

Comment: MM2 - LPMM18/550  Respondent: Bernard Corrigan 10805889  Agent:
MM2
I object to the doubling of space allotted to industry and storage. This is Green Belt land.
There is unused space at Slyfield industrial estate which can be utilised.

Comment: MM41 - LPMM18/552  Respondent: Bernard Corrigan 10805889  Agent:
MM41
I object to the proposal to build 550 houses in an area that is subject regular flooding, Green Belt, and ancient woodland.
This assault on Send's already strained roads, together with a cavalier attitude to Green Belt which cannot be replaced, must be deterred.
Comment: MM44 - LPMM18/551  Respondent: Bernard Corrigan 10805889  Agent:

MM44

I object to another attempt by GBC to include houses on a Green Belt area that would, together with MM41 put too much strain on Send's infrastructure.

Attached documents:

Comment: MM27 - LPMM18/439  Respondent: Belinda Middleton 10807745  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. As noted above nearby roads are popular with cyclists and children travelling to Send Primary and Clandon CofE Schools. Increasing the traffic on these roads will be dangerous, noisy and massively increase pollution to the cyclists, runners and children as they travel to school.

Attached documents:

Comment: MM41 - LPMM18/436  Respondent: Belinda Middleton 10807745  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The number of houses proposed is excessive. It is on green belt land and the development will block the roads nearby which are already prone to significant traffic at peak times. School and medical facilities will be further strained and additional traffic will make crossing the road outside Send Primary School even more dangerous. Send Primary School is full, we do not have a Secondary School (kids are rejected from George Abbot and Hoe Valley and sent to other schools further away) and the doctors is at capacity. There is no infrastructure for these additional homes.

Attached documents:

Comment: MM41 - LPMM18/440  Respondent: Belinda Middleton 10807745  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. As noted above nearby roads are popular with cyclists and children travelling to Send Primary and Clandon CofE Schools. Increasing the traffic on these roads will be dangerous, noisy and massively increase pollution to the cyclists, runners and children as they travel to school.
**Comment: MM42 - LPMM18/437  Respondent: Belinda Middleton 10807745   Agent:*

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive and there is no need for this level of industrial sites in the area when I understand that Slyfield has unused capacity. Nearby roads cannot cope with an increase in large and heavy vehicles. The area is popular with cyclists and there are two primary schools, an increase in such large vehicles would be very dangerous on the roads.

**Comment: MM42 - LPMM18/441  Respondent: Belinda Middleton 10807745   Agent:*

**MM27, MM41, MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. As noted above nearby roads are popular with cyclists and children travelling to Send Primary and Clandon CoE Schools. Increasing the traffic on these roads will be dangerous, noisy and massively increase pollution to the cyclists, runners and children as they travel to school.

**Comment: MM44 - LPMM18/438  Respondent: Belinda Middleton 10807745   Agent:*

**MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63**

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July. It is a Green Belt site with no special circumstances so it also contradicts Policy MM9. The additional traffic will increase pressure on the Send Crossroads. Send Primary School is full, we do not have a Secondary School (kids are rejected from George Abbot and Hoe Valley and sent to other schools further away) and the doctors is at capacity. There is no infrastructure for these additional homes. With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

**Comment: MM48 - LPMM18/442  Respondent: Belinda Middleton 10807745   Agent:*

**MM27, MM41, MM42 and MM48 Transport Strategy**
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. As noted above nearby roads are popular with cyclists and children travelling to Send Primary and Clandon CofE Schools. Increasing the traffic on these roads will be dangerous, noisy and massively increase pollution to the cyclists, runners and children as they travel to school.

Attached documents:

Comment: MM2 - LPMM18/2593  Respondent: David Brandon 10808833  Agent:

I object to various parts of the Main Modifications of the local plan and have my objections placed on record.

MM2. The housing figures are no longer up-to-date. Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year is out of step with the latest ONS figures and the Government's standard method. 630 homes is based on inappropriate assumptions that inflate the figure. Further, it is inappropriate to expect Guildford to sacrifice important and valuable Green Belt land to provide homes for Woking when Guildford is more constrained.

Attached documents:

Comment: MM36 - LPMM18/2594  Respondent: David Brandon 10808833  Agent:

MM36. Revised housing figures and proper management of town centre available space and use of the vast amount of available brownfield sites would eliminate the need building on the Blackwell Farm land, much of which is on a flood plain.

Attached documents:

Comment: MM37 - LPMM18/2595  Respondent: David Brandon 10808833  Agent:

MM37. The proposed road from the A31 into the new estate would be a disaster. The Farnham Road is only single lane in each direction and it is always at a standstill every morning and most evenings going into Guildford. To add many hundreds and even thousands of extra vehicles on a road that is over congested most of the time would be totally irresponsible. The impact on the South side of Guildford would reduce it to an area where access to Guildford would be almost impossible. In addition, the new access road from the Hog's Back which forms part of the 'Surrey Hills', would destroy a large area of ANOB, green belt land, destroy numerous ancient trees and woodland and ruin the view to Guildford and beyond. This proposed new road is also just not practical, being part of the flood plain off the slopes off the Hog's Back. Using the Farnham Road as an access cannot be seriously considered. There are several practical possibilities which do not cause the impact and damage to the area.

A short while ago the Council received over 20,000 objections to the Blackwell Farm plan, nearly one-third of the residence of Guildford.

Just how many objections does it take for the Council to listen to its own residence? It seems clear that the 'influence' of the University of Surrey over-ride the wishes and common sense of its own residence!
Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.
What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway).
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph.
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park.
5. The narrowness of the road near Summers.
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement.
7. The sharp bend near Clandon Regis.
8. The narrowness of the road at the Bull’s Head.
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school.
10. The sharp bend with poor sight lines in either direction at the church.
11. No continuous footpath.
12. The speed of traffic.
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

**MM2** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

**MM2** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

**MM2** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

**MM2** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

**MM2** Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/2819  **Respondent:** Bernice Williams 10809377  **Agent:**

**MM23** In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid "could be anywhere" estates.

**MM23** (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

**MM23** Promotion of "green approaches" should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

**MM23** If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.
MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

**Comment:** MM23 - LPMM18/2827  **Respondent:** Bernice Williams 10809377  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

**Comment:** MM3 - LPMM18/2817  **Respondent:** Bernice Williams 10809377  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

**Comment:** MM3 - LPMM18/2826  **Respondent:** Bernice Williams 10809377  **Agent:**

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**
Comment: MM31 - LPMM18/2820  Respondent: Bernice Williams 10809377  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2821  Respondent: Bernice Williams 10809377  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2822  Respondent: Bernice Williams 10809377  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2823  Respondent: Bernice Williams 10809377  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2824  Respondent: Bernice Williams 10809377  Agent:
MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2825 Respondent: Bernice Williams 10809377 Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2818 Respondent: Bernice Williams 10809377 Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/4202 Respondent: Mrs Penelope Corlett 10815681 Agent:

I object to the revised local plan on the following grounds. It has increased from 400 to 550 homes an increase of 37% to be built in Send. The revised forecast for Guildford has been reduced by 45% by the office of National Statistics. I am also lead to believe the inspector visited Send at the end of August during a holiday period when the schools were on holiday as were many residents, therefore he did not witness the congestion on the roads that exist between the hours of to 9.30 am and 5 to 6.30 pm.  It is imperative that a highways report and feasibility study is made and published before any further development is permitted. Send and Ripley are already at saturation point traffic wise. Another problem is the strain on existing schools and medical services which are at full capacity now.

Attached documents:

Comment: MM27 - LPMM18/4224 Respondent: Mrs Penelope Corlett 10815681 Agent:

There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times.

Attached documents:
I am appalled at the revised local plan which has increased from 400 to 550 homes an increase of 37% to be built in Send when the revised forecast for Guildford has been reduced by 45% in the revised forecast for Guildford by the office of National Statistics. I am also lead to believe the inspector visited Send at the end of August during a holiday period when the schools were on holiday as were many residents, therefore he did not witness the congestion on the roads that exist between the hours of 8 to 9.30 am and 5 to 6.30 pm. It is imperative that a highways report and feasibility study is made and published before any further development is permitted. Send and Ripley are already at saturation point traffic wise. Another problem is the strain on existing schools and medical services which are at full capacity now.

Previous objections have not been considered that this land floods and pictorial evidence was provided. It is Green Belt containing an ancient woodland and the impact on the adjacent roads would be impossible.

MM41 Land at Garlicks Arch Policy A43

There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times.

Comment: MM42 - LPMM18/4221  Respondent: Mrs Penelope Corlett 10815681  Agent:


This site is not required as there is unused capacity at Slyfield and this is Green Belt. This contradicts MM9. Again this would generate more unsustainable traffic.


There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times.

Comment: MM44 - LPMM18/527  Respondent: Mrs Penelope Corlett 10815681  Agent:

MM44. Alderton's Farm. Policy A63
This is Green Belt with no exceptional circumstances and the additional traffic it would produce would, again, put too much pressure on already congested roads at peak times.

**Attached documents:**

**Comment:** MM48 - LPMM18/533  **Respondent:** Mrs Penelope Corlett 10815681  **Agent:**


There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times.

**Attached documents:**

**Comment:** MM5 - LPMM18/4206  **Respondent:** Mrs Penelope Corlett 10815681  **Agent:**

MM5 Travellers Site Ref A44. Send Hill

This Site is totally unsuitable for travellers or any development. It is contaminated land as it was a dump for toxic waste and also Send Hill is only single file in both direction with a very narrow approach on a steep hill to a dangerous blind junction on to Potters Lane. Trailers and caravans would not be able to negotiate the narrow lane.

A42 Send Hill. Development of 40 houses.

This is the adjacent site to MM5 and is unsuitable for the same reason. The traffic at peak school times is already very dangerous by the Send Road traffic lights with cars dropping off children, making it a single access. Send Hill at the Potters Lane end is single track and could not take the additional traffic as there are no passing places.

**Attached documents:**

**Comment:** MM9 - LPMM18/526  **Respondent:** Mrs Penelope Corlett 10815681  **Agent:**

MM9. Green Belt Policy

This should be sacrosanct and there should be no exceptional circumstances.

**Attached documents:**

**Comment:** Other comments - LPMM18/529  **Respondent:** Mrs Penelope Corlett 10815681  **Agent:**

A42 Send Hill. Development of 40 houses.
This is the adjacent site to MM5 and is unsuitable for the same reason. The traffic at peak school times is already very dangerous by the Send Road traffic lights with cars dropping off children, making it a single access. Send Hill at the Potters Lane end is single track and could not take the additional traffic as there are no passing places.

Attached documents:

**Comment:** MM27 - LPMM18/1287  **Respondent:** Jeff Waine 10816481  **Agent:**

MM27, MM41MM42 and MM48

Traffic implication again as more cars will use my road Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.

Its often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.

Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking i mentioned could become unsafe made worst by the councils plans.

Attached documents:

**Comment:** MM41 - LPMM18/1284  **Respondent:** Jeff Waine 10816481  **Agent:**

Objections to local plan

MM41

The figure of 550 homes is too great an amount, its such a large increase. The numbers and amount will impact badly on infrastructure of village and traffic and impact

Areas of concern for me would be (had already objected long with others and this was ignored)

The impact on the greenbelt land and nature wildlife.

The amount of traffic roads congested and getting unsafe and damaged.

School, medical facilities have not been figured in.

Attached documents:

**Comment:** MM41 - LPMM18/1288  **Respondent:** Jeff Waine 10816481  **Agent:**
MM27, MM41, MM42 and MM48

Traffic implication again as more cars will use my road Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.

It's often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.

Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking I mentioned could become unsafe made worst by the councils plans.

Attached documents:

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Comment: MM42 - LPM18/1285  Respondent: Jeff Waine 10816481  Agent:

MM42
Increase on this industrial site means more lorries which are cracking and damaging our houses down Send Road. The road congestion from large heavy and often speeding and weight is bad and damaging houses.
The speed is not monitored well. Health and safety risks. Roads are not of a high standard.
Pollution concerns how will this be monitored and controlled?
Nitrogen dioxide levels are too high. could impact on health and nature would need to be checked.
The site at Slyfield still runs under used

Attached documents:

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Comment: MM42 - LPM18/1289  Respondent: Jeff Waine 10816481  Agent:

MM27, MM41, MM42 and MM48

Traffic implication again as more cars will use my road Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.

It's often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.

Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking I mentioned could become unsafe made worst by the councils plans.

Attached documents:
MM27, MM41, MM42 and MM48

Traffic implication again as more cars will use my road Send road, as it is my son is learning to drive and the road is too congestion for us to even get out of. The speeding and level of traffic dangerous. The house has experienced cracking and damage due to it being roadside and volume and amount of traffic.

Will we as home owners be compensated? we have complained previously? the increase in volume of traffic in Send Road is damaging our house and its losing value and council increasing numbers and traffic this will make it worse.

It often gridlock in Send road outside our house. If an incident on A3 nothing moves. Its impacting on our ability to work/drive and move about.

Pollution would be increased with even more traffic and we may have health issues due to this. With weight and volume of traffic the house cracking i mentioned could become unsafe made worst by the councils plans.

I enjoy the nature wildlife and bringing a family up in Send.
Concerns around roads, impact on environment, use damage, health damage and infrastructure weaknesses are causing me major concern, I object to these changes and express my horror and concern that this was just a tokenism consultation and no one views have been listened to from the last lots of objections. Please can you explain this? Why is there more development than before? What the feedback how has this been implemented?

The worry and impact on villagers mental health and physical health means that by being listened too and having informed choice that the people actually have a say in, could be minimised.

Attached documents:

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MM9
Concerns about land on the edge of the village which is greenbelt and could be built on damaging environment, wildlife and residents.
Green helps peoples mental health and wellbeing and nature will be eradicated.

Attached documents:

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MM27, MM41, MM42 and MM48 Transport Strategy

If GBC go ahead with all the sites in the local plan the road system will come to a grinding halt. The increase in traffic will just cause more gridlock, more frustration to road users, and hence more accidents. Drivers will try to circumnavigate the problem areas down single track roads and cause endless damage and accidents will happen. Every day there will be more noise, more pollution, more delays and more gridlock.

Attached documents:
Comment: MM41 - LPMM18/476  Respondent: Maggie Cole 10816705  Agent:

MM41 – Garlicks Arch – Policy A43

The increase in the number of proposed units is excessive.

Previous objection to the original plan are not taken into consideration.

It is a Green Belt site and should remain so.

Developing Garlicks Arch will join up Ripley and Send and its was always my understanding that GBC pledged to keep villages as separate entities.

The roads cannot cope with the increase in traffic. As a walker, I can wait over 10 minutes to cross main roads in the area at peak times and I would never want to see a child try to negotiate the roads.

Schools and medical facilities are already stretched, especially with the closure of the school in Ripley.

Attached documents:

Comment: MM41 - LPMM18/481  Respondent: Maggie Cole 10816705  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

If GBC go ahead with all the sites in the local plan the road system will come to a grinding halt. The increase in traffic will just cause more gridlock, more frustration to road users, and hence more accidents. Drivers will try to circumnavigate the problem areas down single track roads and cause endless damage and accidents will happen. Every day there will be more noise, more pollution, more delays and more gridlock.

Attached documents:

Comment: MM42 - LPMM18/477  Respondent: Maggie Cole 10816705  Agent:

MM42 – Burnt Common – Policy A58

This plan has now doubled the area for development of industrial units.

Why can they not be put at Slyfield where there is unused capacity.

Send Business Centre has already been increased, why do we need more in this area.

Narrow roads that already suffer gridlock, will be impassable.

Ripley was given a bypass years ago for a reason, the roads are too narrow for modern lorries.

Air quality will suffer from increased traffic on M25/A3 and local roads

Attached documents:
**Comment: MM42 - LPMM18/482  Respondent: Maggie Cole 10816705  Agent:**

MM27, MM41, MM42 and MM48 Transport Strategy

If GBC go ahead with all the sites in the local plan the road system will come to a grinding halt. The increase in traffic will just cause more gridlock, more frustration to road users, and hence more accidents. Drivers will try to circumnavigate the problem areas down single track roads and cause endless damage and accidents will happen. Every day there will be more noise, more pollution, more delays and more gridlock.

**Attached documents:**

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**Comment: MM44 - LPMM18/478  Respondent: Maggie Cole 10816705  Agent:**

MM44 Land at Aldertons Farm – policy A63

It is a green belt site with no special circumstances and will spoil the vista of the heritage buildings on Send Marsh Green. Yet more traffic in the area will cause gridlock at peak times.

With all the other development in the area, infrastructure cannot cope.

**Attached documents:**

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**Comment: MM48 - LPMM18/483  Respondent: Maggie Cole 10816705  Agent:**

MM27, MM41, MM42 and MM48 Transport Strategy

If GBC go ahead with all the sites in the local plan the road system will come to a grinding halt. The increase in traffic will just cause more gridlock, more frustration to road users, and hence more accidents. Drivers will try to circumnavigate the problem areas down single track roads and cause endless damage and accidents will happen. Every day there will be more noise, more pollution, more delays and more gridlock.

All in all, too much development in one corner of Guildford Borough, why can’t the developments be shared with other villages?

**Attached documents:**

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**Comment: MM9 - LPMM18/479  Respondent: Maggie Cole 10816705  Agent:**

MM9 Green Belt Policy

What is the point in having a Green Belt policy when GBC seem to want to ride roughshod over the policy. Limited infilling is one thing, putting huge development in every conceivable piece of land is unacceptable.
POLICY S2

BARTON WILLMORE CONSULTANTS have concluded that the correct housing number for Guildford Borough is in fact 431 - not 789 as proposed!

OTHER DEVELOPMENTS

OBJECTIONS: The total amount of development proposed is quite extraordinary and unreasonable and we cannot understand why Send and Send Marsh are being targeted in this way.

TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.

LAND AT GARLICKS ARCH, SEND MARSH, POLICY A43

OBJECTIONS: Too many houses for infrastructure to cope with.

Green Belt with ancient trees.

Flooding and contamination.

TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.
**Comment: MM42 - LPMM18/2156  Respondent: M Mansbridge 10817633  Agent:**

**REF. MM42**

LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

OBJECTIONS: No need for a huge industrial site in a small village.

Pollution increase.

Road congestion

**REF. MM27, 41, 42 and 48**

TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.

**Comment: MM44 - LPMM18/2157  Respondent: M Mansbridge 10817633  Agent:**

**REF. MM44**

LAND AT ALDERTON'S FARM, SEND MARSH ROAD, POLICY A36

OBJECTIONS: Green Belt Land, and too close to lakes with protection

Wild life corridor

Flooding

**Comment: MM48 - LPMM18/2162  Respondent: M Mansbridge 10817633  Agent:**

**REF. MM27, 41, 42 and 48**

TRANSPORT STRATEGY

OBJECTIONS: There would be total gridlock at rush hours if this amount of development overall is allowed in our small village.
GREEN BELT POLICY

OBJECTIONS: The modifications will encourage developers to push for permissions on farm land and woodland valuable for recreation and wild life.

Transport Strategy

The traffic implications for Send of:
Garlick's Arch,
Burnt Common,
Clockbarn
Alderton's
Gosden Hill
Wisley/Ockham

are not adequately addressed by the A3 / Clandon slip road changes.

No proper assessment of the aggregate traffic impact causing increased noise, nitrogen dioxide pollution, delays and gridlock has been undertaken.

Specific objections:

MM41
Land at Garlicks Arch, Send Marsh.

Policy A43 Increased from 400 to 550 homes (450 to be built in the first five years), an increase of 37%.

- 7000 objections to the previous lower number already provided
- Green Belt containing ancient woodland.
- Joins Send and Ripley
- Leads to over development
- Risks flooding and contamination
- Significant increase in traffic and related congestion, especially at peak times
- School and medical facilities and even retailers and linked car parking will be unable to cope

Attached documents:

Comment: MM41 - LPMM18/277  Respondent: Vanessa Birchall-Scott 10818241  Agent:

MM27  MM41  MM42 and MM48

Transport Strategy

The traffic implications for Send of:

Garlick's Arch,
Burnt Common,
Clockbarn
Alderton's
Gosden Hill
Wisley/Ockham

are not adequately addressed by the A3 / Clandon slip road changes.

No proper assessment of the aggregate traffic impact causing increased noise, nitrogen dioxide pollution, delays and gridlock has been undertaken.

Attached documents:

Comment: MM42 - LPMM18/273  Respondent: Vanessa Birchall-Scott 10818241  Agent:

MM42

Land at Burnt Common, London Road.

Policy A58 Increased from 7000 to a minimum of 14,800 sqm of industrial and storage
Since being taken out of the 2014 plan, this has now been increased twice, doubling the area.
- It would be the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity.
- Special circumstances to warrant this don’t exist and so contradict MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village and as noted, with no proven demand.
- Narrow surrounding roads will not be able to cope with related increase in air pollution.

Attached documents:

Comment: MM42 - LPMM18/278  Respondent: Vanessa Birchall-Scott 10818241  Agent:

MM27 MM41 MM42 and MM48

Transport Strategy

The traffic implications for Send of:
- Garlick's Arch,
- Burnt Common,
- Clockbarn
- Alderton's
- Gosden Hill
- Wisley/Ockham

are not adequately addressed by the A3 / Clandon slip road changes.

No proper assessment of the aggregate traffic impact causing increased noise, nitrogen dioxide pollution, delays and gridlock has been undertaken.

Attached documents:

Comment: MM44 - LPMM18/274  Respondent: Vanessa Birchall-Scott 10818241  Agent:

MM44

Land at Alderton's Farm, Send Marsh Road

Policy A63 - new site for 120 Homes

- This was removed from an earlier draft because of all the objections and then re-inserted after the public examination in July, for not explained reason
- It is a Green Belt site with no special circumstances and so it again contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads.
- It adds 770 houses to the 1700 currently in Send, an increase of 45%.
- This is too much for our infrastructure (roads etc as noted above)

Attached documents:

**Comment:** MM48 - LPMM18/279 **Respondent:** Vanessa Birchall-Scott 10818241  **Agent:**

**MM27 MM41 MM42 and MM48**

**Transport Strategy**

The traffic implications for Send of:

Garlick's Arch,
Burnt Common,
Clockbarn
Alderton's
Gosden Hill
Wisley/Ockham

are not adequately addressed by the A3 / Clandon slip road changes.

No proper assessment of the aggregate traffic impact causing increased noise, nitrogen dioxide pollution, delays and gridlock has been undertaken.

Attached documents:

**Comment:** MM9 - LPMM18/275 **Respondent:** Vanessa Birchall-Scott 10818241  **Agent:**

**MM9**

**Green Belt Policy**

Although the "modifications" claim to protect the Green Belt except in very special circumstances the Council make an exception for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces an opportunity to ignore the Policy with little reasoning via a subjective test and so any land on the edge of Send could be identified for development, with such a loophole deliberately included in Policy.

Attached documents:
Send – Development plans

or perhaps the title should be “Send – plans to destroy a village”!

- four new housing developments,
- two traveller sites,
- an industrial/warehouse complex,
- an enlarged business centre,
- building on perimeter fields,
- two new A3 slip roads

and a related significant reduction in green space, increase in traffic congestion and increased burden on public services/infrastructure.

Yet another (fourth) consultation process, which in itself begs the question whether there is an attempt to wear down residents who have to keep finding time to read and respond! Perhaps this in itself is sufficient to warrant a judicial review, when instead of reducing the development burden upon Send in response to earlier objections, the plans appear to ignore the objections entirely? If through a process of continual consultations with no specific advantage to residents gained by each one, this leads residents to a view that there is little point in objecting or indeed there is just not the time in peoples’ busy lives to do so, then the action of the Council is certainly questionable.

Attached documents:

40 houses and a travellers' site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre

Whilst this consultation does not include the developments listed above, note that:

- This is the Wey Conservation area.
- Added to the other housing sites and industrial space, such heavy concentration in one village, which could be more evenly shared with 40, is totally unreasonable.

Please take account of the objections/comments noted above. This is no NIMBY’ism but genuine concern.

Attached documents:

I am writing to OBJECT to the above sites late addition to the GBC local plan.

My property is adjacent to the proposed development and as such some of my objections are listed below.

1/ EROSION OF THE GREEN BELT.
The site is to have 105 houses built over a 3 year period on designated green belt land, this equates to a 7% increase in the size of Normandy, with no improvements in infrastructure.

The very nature of the area would be changed from green fields to suburbia.

Previous applications to develop this site have been refused with "No Exceptional Circumstances" being one of the reasons. What has changed now.

2/ INCREASE IN TRAFFIC.

The definitions of D road and Lane are as follows.

D road ..... low density of traffic.

Lane.....narrow road especially in rural areas.

In the 7 years of residing on Glaziers lane the amount and type of traffic has increased considerably, to the extent that the above definitions no longer apply. We now have car transporters, double length HGV learner drivers, an assortment of heavy duty trucks (few adhering to the 30 mph speed limit) and the usual assortment of cars vans etc. In fact some are so large they cannot keep within the central white line and only just go under the overhead electric cables. An increase, of a minimum of 200 hundred cars, with new residents would cause even greater congestion and present an ever increasing danger to pedestrians.

3/ PUBLIC TRANSPORT.

Southwestern railways operate Monday to Saturday a twice hourly service from Guildford to Ascot.

Kite operate a bus service from Guildford to Aldershot from the end of Glaziers lane. and the 520 bus service operate 3 times a week along Glaziers lane to Woking once and Guildford twice.

By intimation because the site is near to Wanborough station is GBC expecting the public transport options to be used instead of cars. Does GBC have input into these public transport options to be able to increase frequencies and thus deter new residents not to use cars.

4/The proposed site is built on CLAY and as such during heavy periods of rain FLOODS.

Therefore with all the excavation needed I am very concerned that the natural water table and drainage would be damaged. and water would find new channels leading to more flooded areas possibly on my property.

In conclusion I must ask you to review the need to use this site and utilise any brownfield/derelict land rather than the Green Belt, because once gone its gone forever.

Attached documents:

**Comment:** MM27 - LPMM18/2131  **Respondent:** D Smith 10819329  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

Changes to the A3 Clandon slip roads will have an impact on Send Barns Lane and Send Road as thousands more cars make for Woking. This will also have consequences for Old Woking, as the roads are very narrow with many parked cars, which large vehicles have trouble navigating.

As far as I know no detailed assessment of the impact has been made.
My Wife and I have lived in SEND for over 46 years, during which time traffic has slowly increased.

The proposed changes to the local plan will result in a very large increase in the number of cars and heavy lorries passing through the Village. The result will be an escalation in noise, delays and pollution, which will spoil the rural nature of the village and make it a less desirable place to live.

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

I Object to the excessive increase in the number of houses proposed for this site, which often floods.

The site is Green Belt and contains ancient woodland.

It will join up Send and Ripley which will be considered as over development.

Changes to the A3 Clandon slip roads will have an impact on Send Barns Lane and Send Road as thousands more cars make for Woking. This will also have consequences for Old Woking, as the roads are very narrow with many parked cars, which large vehicles have trouble navigating.

As far as I know no detailed assessment of the impact has been made.

I Object to the industrial allocation doubling. Why? When Slyfield has spare capacity do we need new industrial sites in the Green Belt. The surrounding roads, which are very narrow, will become gridlocked. Pollution, already dangerously high, will be greatly increased.

I Object to the excessive increase in the number of houses proposed for this site, which often floods.

The site is Green Belt and contains ancient woodland.

It will join up Send and Ripley which will be considered as over development.

Changes to the A3 Clandon slip roads will have an impact on Send Barns Lane and Send Road as thousands more cars make for Woking. This will also have consequences for Old Woking, as the roads are very narrow with many parked cars, which large vehicles have trouble navigating.

As far as I know no detailed assessment of the impact has been made.

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Changes to the A3 Clandon slip roads will have an impact on Send Barns Lane and Send Road as thousands more cars make for Woking. This will also have consequences for Old Woking, as the roads are very narrow with many parked cars, which large vehicles have trouble navigating.

As far as I know no detailed assessment of the impact has been made.

**Attached documents:**

**Comment:** MM44 - LPMM18/2129  **Respondent:** D Smith 10819329  **Agent:**

MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63.

I Object to the 120 houses which it is proposed should be built on this Green Belt site.

The additional traffic created by this development will increase pressure on Send crossroads.

**Attached documents:**

**Comment:** MM48 - LPMM18/2134  **Respondent:** D Smith 10819329  **Agent:**

Changes to the A3 Clandon slip roads will have an impact on Send Barns Lane and Send Road as thousands more cars make for Woking. This will also have consequences for Old Woking, as the roads are very narrow with many parked cars, which large vehicles have trouble navigating.

As far as I know no detailed assessment of the impact has been made.

**Attached documents:**

**Comment:** MM9 - LPMM18/2130  **Respondent:** D Smith 10819329  **Agent:**

By decreasing the number of areas with Green Belt status, GBC is unequivocally reducing the protection from adhoc development in Send and its surrounding areas.

**Attached documents:**

**Comment:** MM41 - LPMM18/818  **Respondent:** MP Parrott 10819425  **Agent:**
Local Plan Proposals

I wish to object most strongly to the proposed local plan proposals because:

**MM41 land at Garlicks Arch Send Marsh Policy A43**

The proposal for an additional 550 homes outlined on the above policy, is an increase of 37% on the previous report. The land in question is currently designated Green Belt and is permanently protected by the NPPF which prevents merging of settlements. The site has a particular conservation aspect as it is covered in ancient woodland dating from the 16th century and would be endangered by the scale of these developments. The development of these sites will create a substantial increase in local traffic through Send and Ripley villages which are already very busy and congested at peak times.

**Attached documents:**

---

**Comment:** MM42 - LPMM18/819  **Respondent:** MP Parrott 10819425  **Agent:**

**MM42 land at Burnt Common, London Road, Send, Policy A58**

The proposed increase for industrial development from 7000 sqm to 14,800sqm of industrial and storage is not required. As demonstrated by the latest Employment Needs Assessment 2015 (ELNA) which shows a reduction of 80% in required employment floor space from the previous draft. If there is a need why can't this be provided on the Slyfield or other industrial estates in the borough which have been unused capacity.

The above proposal is in addition to the 25% increase at the Send Business Centre, making a far greater concentration of industrial space than any other village.

**Attached documents:**

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**Comment:** MM44 - LPMM18/820  **Respondent:** MP Parrott 10819425  **Agent:**

**MM44 land at Alderton's Farm, Send Marsh Road, Policy A63**

The proposal for a new site for 120 homes on Green Belt Land would appear to contradict policy MM9 as there are no special circumstances.

With the additional developments proposed for Garlick's Arch (550) Clockbarn (60) Winds Ridge (40) this adds 700 additional houses to the current 1700 houses in the village a 45% increase. This will put excessive strain on the infrastructure, community, transport, roads, medical facilities, schools.

The villages of Send, Send Marsh and Burnt Common are currently not well served by public transport to the main conurbations of Guildford and Woking at the additional housing, and industrial units will therefore result in a substantial increase in local traffic, air pollution, parking problems, and increased accidents in these villages.

What impact will the additional traffic have on the surrounding roads in Send and Ripley and on the A3 which is already overcapacity at peak times in this area?

This development site will also result in loss of wildlife in this beautiful unspoilt part of Surrey with its diverse birdlife.

**Attached documents:**
Have any wildlife and environmental impact assessments been carried out on any of these sites?

What additional facilities are planned to cope with the increased demand for school places, doctors and emergency services from the increase in the pollution?

Has Guildford council given consideration to the development of brownfield sites in the borough before destroying green belt land?

**Attached documents:**

**Comment:** MM41 - LPMM18/5670  **Respondent:** Susan Cooper 10819489  **Agent:**

Green belt Policy MM9

The proposed over development of Send area in particular directly contradicts the claim to protect the Green Belt.

At none of the proposed development sites in Send area can it be demonstrated that there are very special circumstances to make exceptions to The Green Belt Policy.

**Attached documents:**

**Comment:** MM41 - LPMM18/5671  **Respondent:** Susan Cooper 10819489  **Agent:**

Garlicks Arch MM41

Despite there being over 7000 objections to this development site alone, it is now proposed to increase the size of it by over 30% to 550 dwellings and this is considered to be an outrageous abuse of planning authority powers.

Parts of the site regularly flood and although this risk may be eliminated by increasing ground levels, the problem would simply be moved to other areas, most probably putting the houses in Maple Road at further risk.

**Attached documents:**

**Comment:** MM42 - LPMM18/5667  **Respondent:** Susan Cooper 10819489  **Agent:**

I object to the proposed amendments to the 2017 draft local plan for the following reasons:-

I believe the Planning Inspector has misrepresented the residents of Send and Send Marsh.

The 2017 plan already contained proposals to develop more housing than the original concept and over 30,000 objections were made to this. The amendments now under consideration allow for further increase in housing numbers in an area where the Infrastructure is already struggling to cope.

I object to the proposed increase in industrial / commercial development at Burnt Common. MM42
There was never any justification or sensible reason to consider such development in the proposed area although it is now proposed to double the original plan.

There is no need to put industrial development on green belt land, especially whilst Slyfield has unused capacity and such development would put further strain on the narrow road system and further increase Nitrogen Dioxide levels, which are already dangerous.

Attached documents:

Comment: MM44 - LPMM18/5669  Respondent: Susan Cooper 10819489  Agent:

I object to the reintroduction of Aldertons Farm for 120 plus houses. MM44

This development had been previously removed from the local plan, presumably because it had been identified that the many objections raised against it had proven to be valid.

There has been no change in local circumstances and this proposed development would put immeasurable strain on the already overloaded infrastructure.

Attached documents:

Comment: MM2 - LPMM18/1186  Respondent: Marion Gooding 10820385  Agent:

Table S2b out of date and MM3 inadequate and in need of re-examination.

I would like to ask the Inspector to re-open the examination and amend the Local Plan to take account of the latest ONS housing figures.

As I understand it there has been a great deal of work carried out to look into the needs of housing in the future for Guildford. The recent passing of housing planning where the inspector said it was possible to build even more housing than previously submitted appears to be at odds with a report by the ONS that says entirely the opposite. It appears that the population growth previously expected upon which the housing needs were based was entirely incorrect. I therefore would request that the Blackwell Farm development is looked at again. It appears new figures show that only 360 homes a year are required rather than the 672 previously thought to be needed. This makes table S2b out of date and MM3 inadequate and in need of re-examination and means that the extensive loss of green belt land is unjustified.

As previously stated in my objection, I would like the Inspector to take another look at the Blackwell Farm site so that he can reconsider, with the aid of the new figures of 360, the loss of a greenbelt, the fact that congestion is already very bad at this particular part of Guildford and environmental concerns over pollution should mean that rather than develop this site, a greater and more importantly, a more useful area that could be considered is in the town centre where there are significant shortages of housing.

Attached documents:

Comment: MM3 - LPMM18/1187  Respondent: Marion Gooding 10820385  Agent:
Table S2b out of date and MM3 inadequate and in need of re-examination.

I would like to ask the Inspector to re-open the examination and amend the Local Plan to take account of the latest ONS housing figures.

As I understand it there has been a great deal of work carried out to look into the needs of housing in the future for Guildford. The recent passing of housing planning where the inspector said it was possible to build even more housing than previously submitted appears to be at odds with a report by the ONS that says entirely the opposite. It appears that the population growth previously expected upon which the housing needs were based was entirely incorrect. I therefore would request that the Blackwell Farm development is looked at again. It appears new figures show that only 360 homes a year are required rather than the 672 previously thought to be needed. This makes table S2b out of date and MM3 inadequate and in need of re-examination and means that the extensive loss of green belt land is unjustified.

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Attached documents:

Comment: MM27 - LPMM18/833  Respondent: D Davies 10820961  Agent:

MM9 Green Belt Policy MM27 MM41 MM42 and MM48

I think the planning committee pays no attention to the Green Belt and Public Transport. They just want houses and careless about increased noise, nitrogen dioxide and delays and gridlocks plus there are other developments coming up. We need less houses and more amenities. The plan is rubbish.

Attached documents:

Comment: MM41 - LPMM18/829  Respondent: D Davies 10820961  Agent:

This is to object to Guildford Borough Council Local Plan. I object to MM41 Land at Garlicks Arch Send Marsh Policy A43

Increasing 450 to 530 homes is an increase of 37% approx. It is green belt containing ancient woodland that soaks up nitrogen dioxide levels of which are already high dangerously now being a health hazard especially for children. We need more schools and doctors surgeries but you fast close schools down. There are no community [unreadable text] you will be pushing there to breaking point. It [unreadable text] and has lead shot contamination.

Attached documents:

Comment: MM41 - LPMM18/834  Respondent: D Davies 10820961  Agent:
I think the planning committee pays no attention to the Green Belt and Public Transport. They just want houses and careless about increased noise, nitrogen dioxide and delays and gridlocks plus there are other developments coming up. We need less houses and more amenities. The plan is rubbish.

Attached documents:

Comment: MM42 - LPMM18/830  Respondent: D Davies 10820961  Agent:

MM42 Land at Burnt Common Road Send Policy A58 - I object

This has been doubled since being deleted from 2014 plan making the largest allocation of industrial [unreadable text] in the borough putting this on green belt land is ludicrous when Slyfield has unused capacity. Employment land needs assessment showed a reduction in demand so why do we need this. It is a health hazard. Increasing pollution. This is on top of a 25% increase at Send Business could make a bigger concentration in Send than any other village with no proven demand.

Attached documents:

Comment: MM42 - LPMM18/835  Respondent: D Davies 10820961  Agent:

MM9 Green Belt Policy MM27 MM41 MM42 and MM48

I think the planning committee pays no attention to the Green Belt and Public Transport. They just want houses and careless about increased noise, nitrogen dioxide and delays and gridlocks plus there are other developments coming up. We need less houses and more amenities. The plan is rubbish.

Attached documents:

Comment: MM44 - LPMM18/831  Respondent: D Davies 10820961  Agent:

MM44 Land at Aldertons Farm Send Marsh Policy A63 - I object

It is a Green Belt site with no special circumstances so it contradicts MM9. It will distract from the heritage building on Send Marsh Green. It will add to the congestion in the area on Saturday 6th October Guildford and Woking were gridlocked. Buses were running over an hour late [unreadable text]. The weather was bad so adding to the problems will the planning committee be there to sort out the gridlock situation I dont think so.

Attached documents:

Comment: MM48 - LPMM18/836  Respondent: D Davies 10820961  Agent:
I think the planning committee pays no attention to the Green Belt and Public Transport. They just want houses and careless about increased noise, nitrogen dioxide and delays and gridlocks plus there are other developments coming up. We need less houses and more amenities. The plan is rubbish.

Attached documents:

Policy S2

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are hugely less than the total assumed by the Inspector.

Attached documents:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:
I wish to lodge my objections as follows:

**MM41 Land at Garlicks Arch, Send Marsh,**

Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive.
- 7000 objections to the previous lower number have been ignored.
- It is Green Belt containing ancient woodland.
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- The site is covered in high voltage electricity pylons which it has been proven have health risks
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

**Attached documents:**

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**Comment:** MM41 - LPMM18/973  **Respondent:** Karen Dougherty 10822913  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

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**Comment:** MM42 - LPMM18/969  **Respondent:** Karen Dougherty 10822913  **Agent:**

**MM42 Land at Burnt Common, London Road, Send,**

Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area.
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous.

**Attached documents:**

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**Comment:** MM42 - LPMM18/974  **Respondent:** Karen Dougherty 10822913  **Agent:**
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/970  Respondent: Karen Dougherty 10822913  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road

Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads.
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/975  Respondent: Karen Dougherty 10822913  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/971  Respondent: Karen Dougherty 10822913  Agent:

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.
Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM27 - LPMM18/2720  Respondent: David Rider 10826209  Agent: MM27 / MM 41/ MM42 & MM48 traffic impact

I am deeply concerned about the above modifications as well as nearby large proposed developments and combined impact on local roads. A3 Clndon slip road will only increase demand on local roads that are not just designed with a significant increase in traffic. Gridlock risk and environment impact needs to be properly assessed.

Attached documents:

Comment: MM41 - LPMM18/2717  Respondent: David Rider 10826209  Agent: MM41 Garlicks Arch

I strongly object to the further increase to the proposed number of houses (going up from an already excessive 400 to 550 homes). Send existing infrastructure in terms of roads, schools, shops and GP facilities will not be able to cope with a huge increase in number of households. New residents will have to travel further afield to get to Schools in Woking/Guildford adding even further pressure to traffic demand. Currently morning and evening traffic is very busy WITHOUT this increase in demand. With the increase, the risk of daily gridlock will increase substantially.

Attached documents:

Comment: MM41 - LPMM18/2721  Respondent: David Rider 10826209  Agent: MM27 / MM 41/ MM42 & MM48 traffic impact
I am deeply concerned about the above modifications as well as nearby large proposed developments and combined impact on local roads. A3 Clandon slip road will only increase demand on local roads that are not just designed with a significant increase in traffic. Gridlock risk and environment impact needs to be properly assessed.

Attached documents:

Comment: MM41 - LPMM18/2724  
Respondent: David Rider 10826209  
Agent:

In addition to objecting individually to the above Main Modifications, I would like to raise a final objection about the excessive proposed developments within the area of Send/Burnt Common. Given the size of the Guildford Borough area, it seems that a disproportionate burden is being placed on Send compared to other Guildford Borough communities.

Attached documents:

Comment: MM42 - LPMM18/2718  
Respondent: David Rider 10826209  
Agent:

MM42 Burnt Common

I strongly object to the doubling of the area of this industrial site. It is deeply concerning that the GBC plan is resorting to new industrial sites on Green Belt land, where there is space to expand existing sites elsewhere in the Borough on non-Green Belt land, e.g Slyfield. Again, the impact on local roads will be huge and will put a huge burden on the area.

Attached documents:

Comment: MM42 - LPMM18/2722  
Respondent: David Rider 10826209  
Agent:

MM27 / MM 41/ MM42 & MM48 traffic impact

I am deeply concerned about the above modifications as well as nearby large proposed developments and combined impact on local roads. A3 Clandon slip road will only increase demand on local roads that are not just designed with a significant increase in traffic. Gridlock risk and environment impact needs to be properly assessed.

Attached documents:

Comment: MM44 - LPMM18/2719  
Respondent: David Rider 10826209  
Agent:

MM44 Alderton Farm

I strongly object to the proposed housing development on the Green Belt at Alderton Farm. I understand this area was removed from an earlier draft of the Guildford Local Plan, it is very disappointing to see it return despite earlier
reasonably objections including lack of local infrastructure, especially limited and narrow roads such as Send Marsh Road and equally the very narrow Polesden lane – the only 2 roads that allow access to this site.

Attached documents:

Comment: MM48 - LPMM18/2723  Respondent: David Rider 10826209  Agent:

MM27 / MM 41/ MM42 & MM48 traffic impact

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Attached documents:

Comment: MM27 - LPMM18/918  Respondent: Kathryn Fox 10828801  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM41 - LPMM18/915  Respondent: Kathryn Fox 10828801  Agent:

I would like to object, again, to the large-scale planning application of 100 acres between Ripley and Burnt Common.

We purchased our home in the rural village of Send and do not want to be part it to become a large town. The current school, doctor’s surgery and surrounding roads are already at full capacity; this large-scale development is not wanted or required. A further summary of my main concerns are:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Increased from 400 to 550 homes of which 450 to be built in the first five years

MM42 Land at Burnt Common, London Road, Send, Policy A58

Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

• Since being deleted from the 2014 plan this has been increased twice, doubling the area.
• It is by far the largest new industrial allocation in any village in the borough
• There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity.
• There are no special circumstances so it also contradicts MM9.
• The Employment Land Needs Assessment showed a reduction in demand for industrial land.
• This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous.
• At least 800 extra cars will block up the adjacent roads which are already grid locked at peak times.

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Comment: MM42 - LPMM18/920  Respondent: Kathryn Fox 10828801  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM44 - LPMM18/916  Respondent: Kathryn Fox 10828801  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

• New site for 120 Homes including some self build.
• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
• It is a Green Belt site with no special circumstances so it also contradicts policy MM9
• It will detract from the heritage buildings at Send Marsh Green
• The additional traffic will increase pressure on the Send Crossroads.
• With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

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MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

We are all getting very tired of having to continually spend time in objecting to your proposals which are all unfounded to requirements. Send does not need any additional housing or traveller sites. We want to remain as a rural village and we need you to support our requests.

Attached documents:

I object to MM27, MM41, MM42 and MM48.

Traffic has increased considerably through Send Village in the past ten years. The extra traffic that is bound to clog the A247 from the new slip roads with the A3 will expose villagers to significantly increased pollution levels. Children
walking to the local school already are subjected to this. Another 700 houses with, maybe, a further 1400 cars are not going to help. I do not believe GBC has looked at this in a sufficiently robust manner.

Attached documents:

**Comment: MM41 - LPMM18/3308  Respondent: Carey Lodge 10828961  Agent:**

I object to MM41 change at Garlick’s Arch because:

It ignores all the **seven thousand previous objections** made by local people

It is beautiful permanent Green Belt and no “exceptional circumstances” exist to allow development on it.

It will cause over-development of our village and the proposed number of houses increased by 37%, from 400 to 550, is excessive.

It will join up Ripley and Send and defeat the key purpose of Green Belt.

It is subject to frequent flooding and is currently a flood zone 2 allocation.

It is contaminated by lead shot accumulated over fifty years.

It will generate excessive traffic, probably up to 1000 extra cars, that will block up the local roads of Send and Ripley.

It adds to the 45% increase in houses in Send which will overwhelm our local services and change the character of the village. The local schools and GP surgery do not have the capacity to serve this increase in population.

Attached documents:

**Comment: MM42 - LPMM18/3309  Respondent: Carey Lodge 10828961  Agent:**

I object to MM42, Burnt Common, London Road

Traffic has increased considerably through Send Village in the past ten years. The extra traffic that is bound to clog the A247 from the new slip roads with the A3 will expose villagers to significantly increased pollution levels. Children walking to the local school already are subjected to this. Another 700 houses with, maybe, a further 1400 cars are not going to help. I do not believe GBC has looked at this in a sufficiently robust manner.

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I object to MM42, Burnt Common, London Road
It was deleted from the 2014 draft because of all the objections made previously, yet GBC have more than doubled the area proposed for industrial/storage, from 7000 to 14,800 m².

Send is a village, separated from Ripley and Send Marsh by narrow but important areas of green belt and will lose all character if these are built over.

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

The impact on small surrounding roads will just exacerbate problems caused by increased car numbers, through traffic from new A3 junctions and school runs.

**Attached documents:**

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<tr>
<th>Comment: MM42</th>
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<td>Traffic has increased considerably through Send Village in the past ten years. The extra traffic that is bound to clog the A247 from the new slip roads with the A3 will expose villagers to significantly increased pollution levels. Children walking to the local school already are subjected to this. Another 700 houses with, maybe, a further 1400 cars are not going to help. I do not believe GBC has looked at this in a sufficiently robust manner.</td>
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<tr>
<th>Comment: MM44</th>
<th>Respondent: Carey Lodge 10828961</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>I object to MM44.</strong></td>
<td></td>
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<tr>
<td>This is Green Belt land and development is contrary to MM9.</td>
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<tr>
<td>This is another proposal removed from earlier plans due to massive opposition and only reappeared in this latest Local Plan Examination.</td>
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<td>It would add a further 200 plus cars to local traffic.</td>
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<tr>
<td>It adds to the 45% increase in houses in Send which will overwhelm our local services and change the character of the village.</td>
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<td><strong>I object to MM27, MM41, MM42 and MM48.</strong></td>
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Attached documents:
MM41 Garlick’s Arch

The original plan to build houses on green-belt land containing ancient woodland was unacceptable.

The proposed 150 increase in the number of houses just makes it worse. There are already long traffic jams in rush hour through Send village and this proposed modification will make it intolerable. In addition, there is insufficient schooling and medical facilities to support so many additional residents.

Attached documents:

Comment: MM41 - LPMM18/1638  Respondent: Julie Brown 10829121  Agent:

Transport strategy for MM27, MM41, MM42 nd MM48

There has been no rigorous assessment of the impact of the proposed developments on traffic flows in the area. The road to Woking is already gridlocked in rush hour times. The proposed developments would lead to significantly worse traffic which would be intolerable to existing residents.

Attached documents:

Comment: MM42 - LPMM18/1634  Respondent: Julie Brown 10829121  Agent:

MM42 Land at Burnt Common

This represents more than doubling of the industrial and storage space. This is a huge amount for one village, is much bigger than any other village in the borough and is not supported by demand for industrial land. The road infrastructure is insufficient for the traffic volumes that will result.

Attached documents:

Comment: MM42 - LPMM18/1639  Respondent: Julie Brown 10829121  Agent:

Transport strategy for MM27, MM41, MM42 nd MM48

There has been no rigorous assessment of the impact of the proposed developments on traffic flows in the area. The road to Woking is already gridlocked in rush hour times. The proposed developments would lead to significantly worse traffic which would be intolerable to existing residents.

Attached documents:

Comment: MM44 - LPMM18/1635  Respondent: Julie Brown 10829121  Agent:
**MM44 Alderton’s Farm**

This proposed development is on green belt land and there are no special circumstances to justify that. This development would be close to Send Marsh green with beautiful heritage buildings and would completely spoil the character of the area. We chose to live in Send because of the character of the village and its open green space. The local infrastructure cannot accommodate the cumulative effect of so much additional development.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment:</th>
<th>MM48 - LPMM18/1640</th>
<th>Respondent:</th>
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**Transport strategy for MM27, MM41, MM42 nd MM48**

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<th>Comment:</th>
<th>MM9 - LPMM18/1636</th>
<th>Respondent:</th>
<th>Julie Brown 10829121</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**MM9 Green Belt Policy**

The proposed modification to the policy would allow subjective judgements to be made about building on green-belt land. In effect, this would open the flood gates to more and more development on green-belt land that can never be reversed. The policy should be tightened to preserve the nature of the area, not relaxed.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment:</th>
<th>MM27 - LPMM18/763</th>
<th>Respondent:</th>
<th>Kevin Nicholls 10829281</th>
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</table>

**MM27 MM41 MM42 & MM48 Transport Strategy**

As highlighted in the Parish Council report, it is unclear how the traffic implications associated with development contained within the local plan, will be addressed. The proposed changes to the A3 are not adequate and a full and proper assessment needs to be carried out to examine the impact that thousands more vehicles will have around our existing village and environs.

**Attached documents:**

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<th>Respondent:</th>
<th>Kevin Nicholls 10829281</th>
<th>Agent:</th>
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</thead>
</table>
I am objecting (again) to the following aspects of the GBC local plan:

**MM41 - An increase from 400 to 550 homes at Garlicks Arch.**

I am concerned that previous objections have been completely ignored and in light of recent flooding issues in Send and the A3 corridor, this proposal will only raise the risks of further and worse flooding for the area.

The plan does not explain the necessary infrastructure that will be put in place to cater for the rise in population and vehicles etc. I am deeply concerned about the effect this proposal will have on the already heavily congested roads around Send and Burnt Common and similarly have no confidence that the plan will deliver on its strategy of improving cycling and walking facilities. I drive along the Portsmouth Rd and A247 regularly and deem these roads are not adequate for casual cycling and are in fact unsafe.

**Attached documents:**

**Comment:** MM41 - LPMM18/764  **Respondent:** Kevin Nicholls 10829281  **Agent:**

**MM27 MM41 MM42 & MM48 Transport Strategy**

As highlighted in the Parish Council report, it is unclear how the traffic implications associated with development contained within the local plan, will be addressed. The proposed changes to the A3 are not adequate and a full and proper assessment needs to be carried out to examine the impact that thousands more vehicles will have around our existing village and environs.

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**Comment:** MM42 - LPMM18/765  **Respondent:** Kevin Nicholls 10829281  **Agent:**

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As highlighted in the Parish Council report, it is unclear how the traffic implications associated with development contained within the local plan, will be addressed. The proposed changes to the A3 are not adequate and a full and proper assessment needs to be carried out to examine the impact that thousands more vehicles will have around our existing village and environs.

**Attached documents:**

**Comment:** MM42 - LPMM18/767  **Respondent:** Kevin Nicholls 10829281  **Agent:**

**MM42 Land at Burnt Common, London Road, Send Policy A58**

There has been no explanation for the large increase in the proposed industrial site, which represents the largest new industrial allocation in any village in the borough; in addition to the proposed disproportionate housing developments???
This is in spite of the fact the original proposal was removed from the 2014 plan and a better alternative to use unused capacity at Slyfield has previously been suggested and ignored???

Sir, these proposals and others in the area represent a 45% increase in housing in our area. I find this truly disturbing. The council has offered fine words but no substance to its claims of ‘enhancing and improving the greenbelt’, ’improving our cycling and walkways’ and has clearly NOT answered its critics around how local infrastructure will cope with the demands placed upon it by an explosion in population?

I hope the council will see sense and adopt a common sense approach to meet local housing and business needs.

Attached documents:

Comment: MM48 - LPMM18/766  Respondent: Kevin Nicholls 10829281  Agent:

MM27 MM41 MM42 & MM48 Transport Strategy

As highlighted in the Parish Council report, it is unclear how the traffic implications associated with development contained within the local plan, will be addressed. The proposed changes to the A3 are not adequate and a full and proper assessment needs to be carried out to examine the impact that thousands more vehicles will have around our existing village and environs.

Attached documents:

Comment: MM2 - LPMM18/1879  Respondent: Geraldine Leiper 10829889  Agent:

Dear Sirs,

I write to strongly object to the GBC new local plan.

The examination in public needs to be re-opened so the latest office of National Statistics can be used.

I wholly support the representation made by WAG.

How on earth do GBC think they can over rule the S.O.S.who stated ,quite clearly,that NO BUILDING would be allowed on 3 Farm Meadows.

Attached documents:

Comment: MM44 - LPMM18/5969  Respondent: Brian Robinson 10830689  Agent:

I must object in the strongest terms possible to the most recent Planning Proposals for the village of Send and the surrounding area. It would seem that our previous objections have been swept aside and ignored.

It appears that no consideration has been given to the existing residents of Send just to justify the proposed new Planning Requirements.
Before any new proposals are reached detailed infrastructure plans must be established, Send and the surrounding area road layout must be agreed, it is now almost grid locked every day morning and evening.

Other factors including education, medical considerations will be completely over run, despite the ruination of the Village environment and the surrounding Green Belt.

Attached documents:

---

**Comment:** MM27 - LPMM18/3643  **Respondent:** AJ Cheeseman 10830753  **Agent:**

**MM27, MM41, MM42, MM48 Transport Strategy**

- All the proposed developments do not take into consideration the impact of traffic on the community. There could be a further 2000+ cars and lorries going through Send creating noise and air pollution and traffic gridlock. I have lived on Send Barns Lane for the last 6 years and have noticed the traffic get increasingly worse without any new developments. The pollution is evident from the pollution deposits I find on the inside window sills, I have no idea what it is doing to my lungs.
- GBC has no transport strategy.

Attached documents:

---

**Comment:** MM41 - LPMM18/3630  **Respondent:** AJ Cheeseman 10830753  **Agent:**

**MM41 Land at Garlick's Arch, Send Marsh. Policy A43**

I object to the increase in homes from 400 to 550 at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people;
- It is beautiful permanent Green Belt and no ‘exceptional circumstances’ exist;
- It will cause over-development of our village and the number of homes is excessive;
- It is exquisite ancient woodland that existed at the time of Elizabeth 1;
- It will join up Ripley and Send and defeat the purpose of the Green Belt;
- It is subject to frequent flooding and is currently a flood zone 2 allocation;
- It is contaminated by lead shot accumulated over fifty years;
- It will generate excessive traffic that will block up the local roads of Send and Ripley;
- It will create an increase in pollution which will be detrimental to the health of the villager;
- The current infrastructure re schools and medical facilities will not cope with the increase in population.

Attached documents:

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**Comment:** MM41 - LPMM18/3644  **Respondent:** AJ Cheeseman 10830753  **Agent:**

**MM27, MM41, MM42, MM48 Transport Strategy**
• All the proposed developments do not take into consideration the impact of traffic on the community. There could be a further 2000+ cars and lorries going through Send creating noise and air pollution and traffic gridlock. I have lived on Send Barns Lane for the last 6 years and have noticed the traffic get increasingly worse without any new developments. The pollution is evident from the pollution deposits I find on the inside window sills, I have no idea what it is doing to my lungs.
• GBC has no transport strategy.

Attached documents:

Comment: MM42 - LPMM18/3631  Respondent: AJ Cheeseman 10830753  Agent:

MM42 Land at Burnt Common, London Road, Policy A58

I object to the doubling of industrial and storage space from 7000 to minimum of 14800 sq m at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously and now for some reason it is back in the plan with a massive increase in scale;
• The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in demand for industrial land;
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford have empty sites and industrial units – use them first;
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt;
• The impact on small surrounding roads will create traffic gridlock and extra air and noise pollution from heavy goods vehicles.

Attached documents:

Comment: MM44 - LPMM18/3638  Respondent: AJ Cheeseman 10830753  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

I object to the new site for 120 homes because:

• It was deleted from an earlier draft because of all the objections;
• It is beautiful permanent Green Belt and no ‘exceptional circumstances’ exist;
• It will generate at least another 200 cars which will be too great for the narrow roads of Send Marsh and the traffic light crossroads at Send, plus extra pollution.

Attached documents:

Comment: MM48 - LPMM18/3647  Respondent: AJ Cheeseman 10830753  Agent:

MM27, MM41, MM42, MM48 Transport Strategy
• All the proposed developments do not take into consideration the impact of traffic on the community. There could be a further 2000+ cars and lorries going through Send creating noise and air pollution and traffic gridlock. I have lived on Send Barns Lane for the last 6 years and have noticed the traffic get increasingly worse without any new developments. The pollution is evident from the pollution deposits I find on the inside window sills, I have no idea what it is doing to my lungs.
• GBC has no transport strategy.

Attached documents:

Comment: MM9 - LPMM18/3640  Respondent: AJ Cheeseman 10830753  Agent:

MM9 Green Belt Policy

• The Green Belt should be protected under all circumstances with no exceptions. It is a precious commodity for the health and wellbeing of residents and of course wildlife. There should be no development by stealth on any aspect of the Green Belt.

Attached documents:

Comment: MM41 - LPMM18/2344  Respondent: PE Whatley 10830785  Agent:

I am writing to object to the proposed plans for our area.

Objection to MM41 - Land at Garlick's Arch A43

I object to the way that the huge previous response to the proportion of houses to be built in the village overall, but primarily on this site, has been ignored and instead has been increased! The number of houses to be built have been increased by a considerable margin, with a massive influx in the first few years and no plans for better infrastructure to be in place beforehand.

I object to the way the lack of required infrastructure has been swept to one side as if it is unimportant and the only thing that matters is getting more in homes in Guildford regardless of the effects on the existing population.

550 homes here (together with other planned developments in the village) will cause our already congested area with few transport links massive traffic problems. Affordable housing is a joke as the promises of large developers to offer 'affordable housing' and new infrastructure are well-documented to be left out when it comes to the point of delivery and with no possibility of enforcement.

The doctor's surgery and schools are already choked and Ripley School' closure means children will have to travel further to schools at a time when we are trying to cut down on unnecessary travel. This is a laughable situation.

Attached documents:

Comment: MM42 - LPMM18/2345  Respondent: PE Whatley 10830785  Agent:
Objection to MM42 Land at Burnt Common A58

This development was previously removed from the local plan, and I object to its re-insertion at a massively increased size. All industrial sites require more and bigger vehicles to access them. The access through Ripley is poor and already very congested especially at rush hour, and couple this with the increased traffic of the many many new homes planned for the area and this seems to be a step too far for Send.

Send already has new industrial developments and these are not at capacity. Slyfield and other Borough sites have empty space too. Where is the justification for 14800 sqm of industrial space? This will cause chaos, pollution and gridlock for all the village and its residents. Roads, public transport, drainage, power and other facilities are already fairly poor and this will increase the burden considerably.

Attached documents:

Objection to MM44 Land at Alderton's Farm A63

I object to the way the Green Belt is being proposed to be used for building houses when these homes seem to be far beyond the need, and there are no special circumstances. To suggest that proposed homes should be built on Green Belt land is totally unacceptable. I object to the potential retraction of the promises repeatedly made at elections to protect the Green Belt. It will set a precedent for building on any area of Green Belt land that is being lost forever.

Attached documents:

Comment: MM44 - LPMM18/2346  Respondent: PE Whatley 10830785  Agent:

Comment: MM2 - LPMM18/878  Respondent: Mrs Julia Ellis 10834625  Agent:

MM2 – the very recent data from the Office of National Statistics on projected household formation show significant change and provide a clear indication that the Guildford housing requirement should be lowered. I suggest that the Inspector must re-open the Examination of the Local Plan in public to examine this new data and take further advice from the experts.

MM2 – in view of the many critical comments about the required provision of new homes to meet Woking’s unmet need and since we in Guildford are experiencing exactly the same Green Belt constraints as Woking, it is argued that the figure of 42 new homes per year to meet Woking’s unmet need should be significantly reduced, and, if possible, eliminated completely. This view is reinforced by the further observation that Woking’s unmet need is itself likely/undoubtedly overstated following their latest ONS household formation data reduction.

Attached documents:

Comment: MM23 - LPMM18/879  Respondent: Mrs Julia Ellis 10834625  Agent:

MM23 – the importance of Master Planning is appreciated and supported. This is especially important for Gosden Hill Farm (Policy A25) to ensure that no development takes place until agreement is reached between the developer and GBC
on the key infrastructure requirements. However, this Policy makes no specific reference to infrastructure nor to the means by which the Master Plan will be approved. The position of the Master Plan in the planning process is left in the air. It is suggested that this deficiency should be rectified and clearly documented.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM35 - LPMM18/880  Respondent: Mrs Julia Ellis 10834625  Agent:</th>
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<tbody>
<tr>
<td>MM35 – Transport Strategy (1) for Gosden Hill Farm covers a two-way junction with the A3 whilst Transport Strategy (2) covers the possibility of an all movement junction of the A3, A3100, the B2215 and the A247. However, I continue to hold the view that there should be a four-way junction on the A3 itself at Gosden Hill Farm to avoid the unacceptable traffic congestion that this development will cause to both Burpham and Merrow and that Transport Strategy(1) should be amended accordingly.</td>
</tr>
<tr>
<td>MM35 – in view of the impact that the development of Gosden Hill Farm will have on the residents of Merrow I am pleased to note that consideration should be given at the Planning Application stage to safeguard land for a possible connector road to the B2215 London Road /A247 Clandon Road. I trust that this provision will be retained in the Local Plan as it goes forward.</td>
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<th>Comment: MM27 - LPMM18/2439  Respondent: Ms Katherine Gervasio 10836033  Agent:</th>
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<td>MM27 MM41 MM42 and MM48 Transport Strategy</td>
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<td>I object to the inadequate changes to the A3 and Clandon slip roads proposed by Guildford Borough Council which will not accommodate the huge increase in traffic if the Garlick Arch, Burnt Common Clockbarn and Alderton’s Farm developments go ahead. These developments added to the nearby Gosden Hill and Wisley/Ockham developments will augment the traffic on Send Barns Lane and Send Road as thousands more cars head to Woking every day and the damaging effect of this on pollution, noise, gridlock and delays has not been properly assessed.</td>
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<tr>
<td>I have lived at the above address for the last 22 years and I would like to make my objections known for the latest proposed Local Plan Modification in Send.</td>
</tr>
<tr>
<td>MM41 Land at Garlicks Arch, Policy A43</td>
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</table>
I object to the expansion of this development from 400 to 550 houses – it is just excessive and unnecessary. There were 7000 objections to the original proposal of 400 during the consultation so how on earth can this extra amount of houses be justified or are the objections of local residents completed disregarded? This development will basically join up Ripley and Send which surely constitutes over development. The site is often flooded and there is lead shot contamination in the field. Where will the children from this development go to school? Ripley Primary has just been closed and the other primary schools in the area are oversubscribed already! As to where all these people are going to find medical help – the Doctor Surgery is at full capacity.

Attached documents:

Comment: MM41 - LPMM18/2440  Respondent: Ms Katherine Gervasio 10836033  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

I object to the inadequate changes to the A3 and Clandon slip roads proposed by Guildford Borough Council which will not accommodate the huge increase in traffic if the Garlick Arch, Burnt Common Clockbarn and Alderton’s Farm developments go ahead. These developments added to the nearby Gosden Hill and Wisley/Ockham developments will augment the traffic on Send Barns Lane and Send Road as thousands more cars head to Woking every day and the damaging effect of this on pollution, noise, gridlock and delays has not been properly assessed.

I would like these objections to be noted and preferably listened to - unlike the 33,000 earlier objections sent in by me and other local residents which seem to have been completely ignored.

Attached documents:

Comment: MM42 - LPMM18/2436  Respondent: Ms Katherine Gervasio 10836033  Agent:

MM42 at Burnt Common, London Road, Send Policy A58

I object to this proposed industrial and storage development. It was DROPPED from the draft but now has not only been reinstated but expanded! There is no evidence that an industrial allocation this large is actually needed in any village in the borough, let alone Send and, along with the 25% increased development at Send Business Centre it makes this a bigger concentration than any other village with no proven demand. I object to this inclusion of a Green Belt site because Slyfield has unused capacity. Therefore there are no special circumstances in this case to use Green Belt land – Slyfield is the obvious choice.

Attached documents:

Comment: MM42 - LPMM18/2441  Respondent: Ms Katherine Gervasio 10836033  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

I object to the inadequate changes to the A3 and Clandon slip roads proposed by Guildford Borough Council which will not accommodate the huge increase in traffic if the Garlick Arch, Burnt Common Clockbarn and Alderton’s Farm developments go ahead. These developments added to the nearby Gosden Hill and Wisley/Ockham developments will
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I would like these objections to be noted and preferably listened to - unlike the 33,000 earlier objections sent in by me and other local residents which seem to have been completely ignored.

Attached documents:

Comment: MM44 - LPMM18/2437  Respondent: Ms Katherine Gervasio 10836033  Agent:

MM44 at Alderton’s Farm, Send Marsh Road Policy A63

I object to this proposed development. It was also dropped from an earlier draft because of objections and then re-instated during the public examination in July. It is Green Belt land and has no special circumstances to warrant its inclusion. It will detract from the heritage buildings at Send Marsh Green, the additional traffic from it will increase congestion at Send Crossroads with the resultant pollution damage and will increase the overall housing development in Send by 45% - far too much for the current infrastructure!

Attached documents:

Comment: MM48 - LPMM18/2442  Respondent: Ms Katherine Gervasio 10836033  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

I object to the inadequate changes to the A3 and Clandon slip roads proposed by Guildford Borough Council which will not accommodate the huge increase in traffic if the Garlick Arch, Burnt Common Clockbarn and Alderton’s Farm developments go ahead. These developments added to the nearby Gosden Hill and Wisley/Ockham developments will augment the traffic on Send Barns Lane and Send Road as thousands more cars head to Woking every day and the damaging effect of this on pollution, noise, gridlock and delays has not been properly assessed.

I would like these objections to be noted and preferably listened to - unlike the 33,000 earlier objections sent in by me and other local residents which seem to have been completely ignored.

Attached documents:

Comment: MM9 - LPMM18/2438  Respondent: Ms Katherine Gervasio 10836033  Agent:

MM9 Green Belt Policy

I object to the use of Green Belt land; it is being used for indiscriminate development under the guise of ‘special circumstances’ as in “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This is a very subjective test and has opened up the way for ruthless developers and speculators at the expense of local residents.

Attached documents:
### Comment: MM41 - LPMM18/795  
**Respondent:** J.H. Lakeman 10837665  
**Agent:**

Once again, I feel obliged to have to object to the modifications to the Local Plan as they impact the village of SEND excessively.

I object to MM41 Land at Garlicks Arch, Send Marsh, Policy A43, it is an ancient woodland & Green Belt and an increase of over 35% in housing with the resultant traffic will practically block the surrounding roads which are already heavily overcrowded. This will almost join-up Send & Ripley, wrecking two villages and strain both medical facilities and schools. The area of the site is contaminated by lead shot and subject to frequent flooding.

**Attached documents:**

### Comment: MM42 - LPMM18/797  
**Respondent:** J.H. Lakeman 10837665  
**Agent:**

I object to MM42 Land at Burnt Common, London Road, Send, Policy A58. This doubles the area deleted from the 2014 Plan and it is by far the largest industrial area projected for any of the Borough Villages! When Slyfield has unused capacity and as there are no special circumstances, it contradicts MM9. The Employment Land Needs Assessment showed a reduction in demand for Industrial Land and any increase in Large Lorry traffic would saturate the local narrow roads.

I & my family have [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] and all of that time your planners have made concerted efforts to spoil the green & pleasant village feel that we chose to live in, isnt it time you showed a little empathy with the pleas that you disregard?

**Attached documents:**

### Comment: MM44 - LPMM18/796  
**Respondent:** J.H. Lakeman 10837665  
**Agent:**

I object to MM44 Land at Aldertons Farm, Send Marsh Road Policy A63, yet again it is a Green Belt site in contradiction of Policy MM9 and there are no special circumstances and a certain detraction from the heritage building at Send Marsh Green. Send Crossroads will be subjected to extra traffic and when added to extra housing at Garlicks Arch, Clockbarn and Winds Ridge, it will swamp our infrastructure.

**Attached documents:**

### Comment: MM2 - LPMM18/2694  
**Respondent:** Jacky Fenton 10839009  
**Agent:**

**Policy S2**

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office
for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year.

I hope you take my objections into account when making your final decisions.

Attached documents:

Comment: MM27 - LPMM18/2690  Respondent: Jacky Fenton 10839009  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send with Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Gosden Hill and Wisley/Ockham developments have not been adequately addressed by the A3 changes and the Clandon slip roads. You have not assessed the amount of traffic that is currently on the roads let alone the thousands more cars heading to Woking everyday causing increased noise, pollution and gridlock!

Attached documents:

Comment: MM41 - LPMM18/2686  Respondent: Jacky Fenton 10839009  Agent:

Local Plan: Strategy and Sites - Main Modifications

I am writing again to object to the modifications to the Local Plan as follows:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

I strongly objected previously to the housing suggestion at Garlicks Arch. Now you are suggesting even more houses from 400 to 550 an increase of 37%, this is excessive! You have totally ignored our 7000 objections to the previous lower number.

Again, I strongly objected previously to removing Send from the Green Belt because this area is permanently protected by the NPPF which prevents merging settlements! This area contains ancient woodland with trees from the 16th Century.

Send Road is already gridlocked all day long and not just in rush hour. Another 800 cars on the road will block up all adjacent roads too.

Ours Schools and Medical Facilities are already stretched to capacity with the housing we have currently. These facilities cannot handle more population.

Garlicks Arch will join up Send and Ripley and will cause major over development and thus be subject to frequent flooding. This area is contaminated with lead shot so will pollute the areas around it.

Attached documents:

Comment: MM41 - LPMM18/2691  Respondent: Jacky Fenton 10839009  Agent:
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send with Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Gosden Hill and Wisley/Ockham developments have not been adequately addressed by the A3 changes and the Clandon slip roads. You have not assessed the amount of traffic that is currently on the roads let alone the thousands more cars heading to Woking everyday causing increased noise, pollution and gridlock!

Attached documents:

Comment: MM42 - LPMM18/2687  Respondent: Jacky Fenton 10839009  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

Again since my last objection this has increased from 7000 to a minimum of 14,800sqm of industrial usage and storage. You deleted it from the 2014 plan but since has returned and increased twice doubling the area! Why are you suggesting to build the largest new industrial allocation in any village, in the borough, when The Employment Land Needs Assessment showed a reduction in demand for industrial land? Send Business Centre already has a proposed 25% increase this makes the concentration in Send much larger than any other village with and no proven demand.

Slyfield Industrial Estate in Guildford has unused capacity so why propose another site? There are no special circumstances so it contradicts MM9.

We have very narrow surrounding roads which will be gridlocked and with the amount of traffic we currently have to endure our Nitrogen Dioxide levels are already dangerous.

Attached documents:

Comment: MM42 - LPMM18/2692  Respondent: Jacky Fenton 10839009  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send with Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Gosden Hill and Wisley/Ockham developments have not been adequately addressed by the A3 changes and the Clandon slip roads. You have not assessed the amount of traffic that is currently on the roads let alone the thousands more cars heading to Woking everyday causing increased noise, pollution and gridlock!

Attached documents:

Comment: MM44 - LPMM18/2688  Respondent: Jacky Fenton 10839009  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July and this is a Green Belt site with no special circumstances so it also contradicts policy MM9. The additional traffic will
put even more pressure on our roads especially the Send Cross Roads and increase our Nitrogen Dioxide levels further. Our infrastructure cannot cope with all these additional houses we are a small Village!

Comment: MM48 - LPMM18/2693  Respondent: Jacky Fenton 10839009  Agent: MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send with Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Gosden Hill and Wisley/Ockham developments have not been adequately addressed by the A3 changes and the Clandon slip roads. You have not assessed the amount of traffic that is currently on the roads let alone the thousands more cars heading to Woking everyday causing increased noise, pollution and gridlock!

Comment: MM9 - LPMM18/2689  Respondent: Jacky Fenton 10839009  Agent: MM9 Green Belt Policy

Your modifications claim to protect the Green Belt except in very special circumstances, “limited infilling” as you state! This basically means that if you chose you can offer the land to Developers which totally negates its protection.


MM42 - Land at Burnt Common, London Road, Send, Policy A58

MM44 - Land at Alderton's Farm, Send Marsh Road - Policy A63

MM9 - Green Belt Policy

MM27, MM41, MM42 and MM48 - Traffic

There are unimaginable difficulties with your proposed plan for Send and Send Marsh. There is not enough infrastructure to house the proposed amount (for example)

- of cars (and the extra pollution that they will bring)
- a lot more people needing healthcare
- schooling
- our small country lanes
• and we are **DEFINITELY NOT AN INDUSTRIAL AREA**, why not enlarge Slyfield, which has empty space readily available?
• plan to route the A3 traffic towards Woking through Burpham.

The proposed 750 houses will more than likely mean 1500 more cars on our narrow roads. We can't move freely now when there are roadworks or an accident or breakdown, let alone move with all this extra traffic.

Try coming around to this are at 'rush' hour or when there has been an accident - it's a nightmare.

NO, NO, NO TO YOUR PLAN

Attached documents:

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**Comment:** MM41 - LPMM18/1153  **Respondent:** F.A. Howell 10839393  **Agent:**

**Re: MM41 - Land at Garlicks Arch, Send Marsh, Policy A43**

**MM42 - Land at Burnt Common, London Road, Send, Policy A58**

**MM44 - Land at Alderton's Farm, Send Marsh Road - Policy A63**

**MM9 - Green Belt Policy**

**MM27, MM41, MM42 and MM48 - Traffic**

There are unimaginable difficulties with your proposed plan for Send and Send Marsh. There is not enough infrastructure to house the proposed amount (for example)

• of cars (and the extra pollution that they will bring)
• a lot more people needing healthcare
• schooling
• our small country lanes
• and we are **DEFINITELY NOT AN INDUSTRIAL AREA**, why not enlarge Slyfield, which has empty space readily available?
• plan to route the A3 traffic towards Woking through Burpham.

The proposed 750 houses will more than likely mean 1500 more cars on our narrow roads. We can't move freely now when there are roadworks or an accident or breakdown, let alone move with all this extra traffic.

Try coming around to this are at 'rush' hour or when there has been an accident - it's a nightmare.

NO, NO, NO TO YOUR PLAN

Attached documents:

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**Comment:** MM42 - LPMM18/1154  **Respondent:** F.A. Howell 10839393  **Agent:**

**Re: MM41 - Land at Garlicks Arch, Send Marsh, Policy A43**
MM42 - Land at Burnt Common, London Road, Send, Policy A58

MM44 - Land at Alderton's Farm, Send Marsh Road - Policy A63

MM9 - Green Belt Policy

MM27, MM41, MM42 and MM48 - Traffic

There are unimaginable difficulties with your proposed plan for Send and Send Marsh. There is not enough infrastructure to house the proposed amount (for example)

- of cars (and the extra pollution that they will bring)
- a lot more people needing healthcare
- schooling
- our small country lanes
- and we are DEFINITELY NOT AN INDUSTRIAL AREA, why not enlarge Slyfield, which has empty space readily available?
- plan to route the A3 traffic towards Woking through Burpham.

The proposed 750 houses will more than likely mean 1500 more cars on our narrow roads. We can’t move freely now when there are roadworks or an accident or breakdown, let alone move with all this extra traffic.

Try coming around to this area at ‘rush’ hour or when there has been an accident - it’s a nightmare.

NO, NO, NO TO YOUR PLAN

Attached documents:

Comment: MM44 - LPMM18/1155  Respondent: F.A. Howell 10839393  Agent:

Re: MM41 - Land at Garlicks Arch, Send Marsh, Policy A43

MM42 - Land at Burnt Common, London Road, Send, Policy A58

MM44 - Land at Alderton's Farm, Send Marsh Road - Policy A63

MM9 - Green Belt Policy

MM27, MM41, MM42 and MM48 - Traffic

There are unimaginable difficulties with your proposed plan for Send and Send Marsh. There is not enough infrastructure to house the proposed amount (for example)

- of cars (and the extra pollution that they will bring)
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- schooling
- our small country lanes
- and we are DEFINITELY NOT AN INDUSTRIAL AREA, why not enlarge Slyfield, which has empty space readily available?
- plan to route the A3 traffic towards Woking through Burpham.

The proposed 750 houses will more than likely mean 1500 more cars on our narrow roads. We can’t move freely now when there are roadworks or an accident or breakdown, let alone move with all this extra traffic.
Try coming around to this area at 'rush' hour or when there has been an accident - it's a nightmare.

NO, NO, NO TO YOUR PLAN

Attached documents:

Comment: MM48 - LPMM18/1160  Respondent: F.A. Howell 10839393  Agent:

Re: MM41 - Land at Garlicks Arch, Send Marsh, Policy A43

MM42 - Land at Burnt Common, London Road, Send, Policy A58

MM44 - Land at Alderton's Farm, Send Marsh Road - Policy A63

MM9 - Green Belt Policy

MM27, MM41, MM42 and MM48 - Traffic

There are unimaginable difficulties with your proposed plan for Send and Send Marsh. There is not enough infrastructure to house the proposed amount (for example)

- of cars (and the extra pollution that they will bring)
- a lot more people needing healthcare
- schooling
- our small country lanes
- and we are DEFINITELY NOT AN INDUSTRIAL AREA, why not enlarge Slyfield, which has empty space readily available?
- plan to route the A3 traffic towards Woking through Burpham.

The proposed 750 houses will more than likely mean 1500 more cars on our narrow roads. We can't move freely now when there are roadworks or an accident or breakdown, let alone move with all this extra traffic.

Try coming around to this area at 'rush' hour or when there has been an accident - it's a nightmare.

NO, NO, NO TO YOUR PLAN

Attached documents:

Comment: MM9 - LPMM18/1156  Respondent: F.A. Howell 10839393  Agent:

Re: MM41 - Land at Garlicks Arch, Send Marsh, Policy A43

MM42 - Land at Burnt Common, London Road, Send, Policy A58

MM44 - Land at Alderton's Farm, Send Marsh Road - Policy A63

MM9 - Green Belt Policy

MM27, MM41, MM42 and MM48 - Traffic
There are unimaginable difficulties with your proposed plan for Send and Send Marsh. There is not enough infrastructure to house the proposed amount (for example)

- of cars (and the extra pollution that they will bring)
- a lot more people needing healthcare
- schooling
- our small country lanes
- and we are **DEFINITELY NOT AN INDUSTRIAL AREA**, why not enlarge Slyfield, which has empty space readily available?
- plan to route the A3 traffic towards Woking through Burpham.

The proposed 750 houses will more than likely mean 1500 more cars on our narrow roads. We can't move freely now when there are roadworks or an accident or breakdown, let alone move with all this extra traffic.

Try coming around to this are at 'rush' hour or when there has been an accident - it's a nightmare.

**NO, NO, NO TO YOUR PLAN**

**Attached documents:**

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**Comment:** MM27 - LPMM18/1767  **Respondent:** Lawrence Harris 10839649  **Agent:**

MM27, MM41, MM42 and MM48...Transport Strategy

I cannot see any evidence that a proper traffic impact assessment has been carried out to ‘prove’ the actual impact on the villages of Send and Clandon of the proposed changes to the A3 at Burnt Common. It is not acceptable to merely ‘state’ that everything will be ‘fine’ when it clearly will not as thousands more vehicles head through both villages every day!!

**Attached documents:**

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**Comment:** MM41 - LPMM18/1763  **Respondent:** Lawrence Harris 10839649  **Agent:**

I refer to GBC Local Plan Main Modifications and wish to make the following objections to proposed modifications affecting the village of Send:

MM41...Policy A43

I object to the proposed increase in the number of houses from 400 to 550 as it is excessive (37%) and takes absolutely no notice of all previous objections to this development. There appears to have been little or no consideration of points raised with respect to drainage, Green Belt infringement, traffic congestion, ground contamination, destruction of ancient woodland and the creation of ribbon development along the A3 which effectively connects Send with Ripley.

**Attached documents:**

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**Comment:** MM41 - LPMM18/1768  **Respondent:** Lawrence Harris 10839649  **Agent:**
MM27, MM41, MM42 and MM48....Transport Strategy

I cannot see any evidence that a proper traffic impact assessment has been carried out to ‘prove’ the actual impact on the villages of Send and Clandon of the proposed changes to the A3 at Burnt Common. It is not acceptable to merely ‘state’ that everything will be ‘fine’ when it clearly will not as thousands more vehicles head through both villages every day!!

Attached documents:

Comment: MM42 - LPMM18/1764  Respondent: Lawrence Harris 10839649  Agent:

MM42....Policy A58

This area was deleted from the 2014 Plan and seems to have entered later plans ‘by the back door’ despite many previous objections. I would question whether there is a need for additional industrial sites on Green Belt land such as this when designated sites such as Slyfield have unused capacity. I note that a 25% increase at Send Business Centre has been ‘approved ‘ in the previous incarnation of the plan despite all objections and the latest proposal means that there will be a bigger concentration of industrial sites in Send than any other village with no proven demand for such facilities.

Attached documents:

Comment: MM42 - LPMM18/1769  Respondent: Lawrence Harris 10839649  Agent:

MM27, MM41, MM42 and MM48....Transport Strategy

I cannot see any evidence that a proper traffic impact assessment has been carried out to ‘prove’ the actual impact on the villages of Send and Clandon of the proposed changes to the A3 at Burnt Common. It is not acceptable to merely ‘state’ that everything will be ‘fine’ when it clearly will not as thousands more vehicles head through both villages every day!!

Attached documents:

Comment: MM44 - LPMM18/1765  Respondent: Lawrence Harris 10839649  Agent:

MM44....Policy A63

This development was deleted from earlier drafts due to the number of objections and I can see no reason why it should be approved now. I therefore object to its inclusion as it clearly contradicts Policy MM9 with respect to Green Belt development as well as making the total number of 770 new houses in Send an increase of 45% over the current number of properties in the village.

Attached documents:

Comment: MM48 - LPMM18/1770  Respondent: Lawrence Harris 10839649  Agent:
MM27, MM41, MM42 and MM48...Transport Strategy

I cannot see any evidence that a proper traffic impact assessment has been carried out to ‘prove’ the actual impact on the villages of Send and Clandon of the proposed changes to the A3 at Burnt Common. It is not acceptable to merely ‘state’ that everything will be ‘fine’ when it clearly will not as thousands more vehicles head through both villages every day!!

I thank you for your attention to this matter and request your serious consideration of my objections and the many others that you have no doubt received with respect to the proposed developments under the latest modifications to the Local Plan.

Attached documents:

Comment: MM9 - LPMM18/1766  Respondent: Lawrence Harris 10839649  Agent:

MM9...Green Belt

I would question whether this policy will actually protect the Green Belt it seems that in reality it will lead to the development of any land on the edge of our village where developers and speculators will be able to circumvent the Policy by providing judicious responses to the subjective test required under the Policy.

Attached documents:

Comment: MM41 - LPMM18/1013  Respondent: Mark Pycraft 10839937  Agent:

MM41 - Land at Garlick's Arch, Send Marsh Burnt Common and Ripley

This site is also falls foul of the National Planning Policy Framework (point 80), as detailed above (see MM44), as it would join up Ripley and Send. In terms of building, there is ancient woodland at this site; even more notable is that, like site MM44 it is often flooded, and, I have been informed, poses a serious health threat, as it is contaminated with lead shot.

Even if these valid reasons are ignored, then it seems ridiculous to have increased the proposed number of houses to be built by nearly 40% more than in previous versions of the plan.

Main access to this site is proposed to be via the A247. Everyone familiar with this road knows that it already suffers from heavy congestion throughout the day, and during the rush hours can even be brought to a standstill, with traffic backed up from the Burnt Common roundabout, all the way down to Woking. Woking itself is undergoing significant redevelopment, so there will be a further increase in traffic as a result. Factor into this the additional 770 houses proposed for the area (at Clockbarn, Winds Ridge and Garlick's Arch), and one can see how chaotic the situation will be.

This is arguably the most significant reason to object to the development of sites MM44, MM42, and MM41; Send simply does not have the infrastructure to cope with the increased traffic. It is a small area with few roads, which are narrow and twisting, and are already struggling to cope with the current level of traffic. When one also considers the difficulty driving past the school in Send, with its speed restriction layout and the volume of cars parked on the road and grass verges as parents drop off or collect their children, one not only has to consider traffic congestion, but also the safety of pedestrians, including the increased pollution. Anyone who actually lives in or around Send knows that it is simply unsuitable for further development.

I hope these concerns are given due consideration.
Comment: MM42 - LPMM18/1012  Respondent: Mark Pycraft 10839937  Agent:

MM42 - Land around Burnt Common warehouse, London Road, Send

MM42 is another site which qualifies as 'inappropriate development', so I refer you once again to Policy P2, MM9, Policy Paragraph (1), as detailed above under my comments for MM44. However, as I fear that this will be ignored, I would also implore you to consider that there is a large area of the already existing industrial site at Slyfield that should be utilised instead of building anew at MM42.

I have also noticed that the proposed area at MM42 has now more than doubled in size compared to previous versions of the plan; this at a time when the Employment Needs Assessment actually showed that there is much less demand for industrial sites than there was previously, thus making the development of this site much harder to justify.

Attached documents:

Comment: MM44 - LPMM18/1011  Respondent: Mark Pycraft 10839937  Agent:

I am writing to object to the Local Plan proposals for Send and Send Marsh. My objections are as follows:

MM44 - Land west of Alderton's Farm, Send Marsh Road, Send

This site is inappropriate for development for several reasons. Firstly, traffic filters off the A3 and down through Send Marsh via Send Marsh Road, the only road which passes the proposed site. This road is narrow, so much so that vehicles have to slow in order to give way to oncoming traffic over a bridge on a stretch of this road very near to the site. Traffic along the road is additionally slowed by a near-90-degree turn at Send Marsh Green (the site of several accidents over the years). There is a similar turn at the other end of the road on the approach to Mays Corner crossroads. All these factors already slow the traffic. Therefore, the traffic from the proposed housing at the site will only add to the traffic flow problem. This additional burden will also add to the slow, heavy commuter traffic that travels through Send, which frequently approaches gridlock.

The site in question is also unsuitable due to this particular area of land flooding easily and often, particularly during winter (the area is called Send Marsh for a reason).

For these reasons, this site should be considered to be one of inappropriate development. Policy P2, MM9, Policy Paragraph (1) states that 'inappropriate development will not be permitted unless very special circumstances can be demonstrated.' There are no such circumstances in this case.

A final objection is that this site acts as a barrier between Send Marsh and Send Village. Therefore, the proposal falls foul of the National Planning Policy Framework (point 80), which states that one of the purposes of Green Belt land is 'to prevent neighbouring towns merging into one another'.

Attached documents:

Comment: MM27 - LPMM18/1136  Respondent: J.A. Manlow 10840321  Agent:
The impact on Send Barns Lane and Send Road as thousands more cars lead to Woking every day, causing increased noise, pollution, delays and gridlock, will be much heavier.

Attached documents:

**Comment:** MM41 - LPMM18/1132  **Respondent:** J.A. Manlow 10840321  **Agent:**

It has been brought to my attention that all the objections raised regarding the redevelopment of Send and surrounding areas has been rejected. This is the 4th letter I have written because, as a resident of Send Marsh since 1968, I feel very strongly that the infrastructure of this historic beautiful area will be destroyed.

**MM41 - Land at Garlicks Arch, Policy A43**

An increase of 37% in the number of houses proposed is excessive - 7000 objections have been ignored.

Attached documents:

**Comment:** MM41 - LPMM18/1137  **Respondent:** J.A. Manlow 10840321  **Agent:**

MM27 MM41 MM42 + MM48 - Transport

The impact on Send Barns Lane and Send Road as thousands more cars lead to Woking every day, causing increased noise, pollution, delays and gridlock, will be much heavier.

Attached documents:

**Comment:** MM42 - LPMM18/1133  **Respondent:** J.A. Manlow 10840321  **Agent:**

MM42 - Land at Burnt Common, London Road, Send, Policy A58

Why put new industrial sites in the Green Belt when Slyfield has unused capacity.

Attached documents:

**Comment:** MM42 - LPMM18/1138  **Respondent:** J.A. Manlow 10840321  **Agent:**

MM27 MM41 MM42 + MM48 - Transport
The impact on Send Barns Lane and Send Road as thousands more cars lead to Woking every day, causing increased noise, pollution, delays and gridlock, will be much heavier.

**Attached documents:**

**Comment: MM44 - LPMM18/1134  Respondent: J.A. Manlow 10840321  Agent:**

**MM44 - Land at Aldertons Farm, Send Marsh Road, Policy A63**

New site for 120 homes - including some self build. It will detract from the heritage buildings at Send Marsh Green and the additional traffic will increase pressure on the Send crossroads.

**Attached documents:**

**Comment: MM48 - LPMM18/1139  Respondent: J.A. Manlow 10840321  Agent:**

**MM27 MM41 MM42 + MM48 - Transport**

The impact on Send Barns Lane and Send Road as thousands more cars lead to Woking every day, causing increased noise, pollution, delays and gridlock, will be much heavier.

**Attached documents:**

**Comment: Other comments - LPMM18/1140  Respondent: J.A. Manlow 10840321  Agent:**

Why do we have to have a Travellers' site on Send Hill. The mess and devastation caused by these sites is a real problem.

I hope my objections will be looked into thoroughly, keeping Surrey and its villages beautiful.

**Attached documents:**

**Comment: MM2 - LPMM18/2284  Respondent: John Pyne 10840641  Agent:**

**POLICY S2**

- I object to the way GBC uses the word 'need' in place of 'demand' when promoting house building requirements in this area.
- I object that the figure for Guildford Borough housing need used by the Inspector was 789 per annum. This has been discredited as shown to be a high over-estimate and therefore is an unreliable and irrelevant basis on which to plan housing for the area.
• I object that GBC is using failing to acknowledge and amend their discredited figure of 789 per annum when Barton Willmore - a respected consultancy - has said that the correct figure should be 431.
• I object that GBC is not considering relevant data when proposing housing need and this will impact on and encourage excessive development in Send and destroy our village and its character.
• I object that GBC fails to take into account publicly available data which proposes a much lower number of housing need for our borough and village and - in the face of sustained and numerous objections from residents - instead proposes numbers and developments which would only meet the needs of housebuilders and developers.

Attached documents:

Comment: MM27  LPMM18/2276  Respondent: John Pyne 10840641  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

• I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM41  LPMM18/2267  Respondent: John Pyne 10840641  Agent:

RE: Objections to Guildford Borough Council (GBC) Local Plan - Consultation due to close on 23.10.2018

I am writing in response to the latest version of the Local Plan as outline in GBC-LPSS-026. As in earlier versions of the plan, the modifications presented for Send are inappropriate, excessive and will be highly detrimental to our village, our quality of life and our future. These changes will result in irreversible destruction of our village.

The local plan in its current form illustrates the continued failure of GBC to provide a plan that is fit for purpose, supported by competent data made available in the public domain, which provides for the needs of current residents, and secures the best future for them and LISTENS TO LOCAL VOICES.

MM41 LAND AT GARLICK’S ARCH, SEND MARCH, POLICY A43

• I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide 'exceptional circumstances' to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
• I object that this development is proposed on Green Belt Land and will destroy countryside and ancient woodland.
• I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
• I object because local infrastructure will not be able to support the additional demands of new residents.
• I object to GBC’S proposal to consider and adequately address infrastructure requirements when proposing an excessive, unnecessary and disproportionate increase in housing for Send and Send Marsh.
• I object because local schools and medical facilities will not be able to support the massive increase in demands resulting from this plan.
• I object because wildlife will be displaced.
• I object because the site is subject to frequent flooding, which will only worsen with increased buildings and ground coverage.
• I object because the land is contaminated by lead shot and this will compound the problem of increased flooding as outlined in my previous objection and be detrimental to health and well-being.
• I object to GBC ignoring the 7,000 previous objections raised by local residents with regard to developing this area.
• I object to GBC increasing by 37% the number of houses in this development, which is excessive and not supported by need but demand and proposed to promote excessive and unnecessary housing development in this area to the benefit of housing developers but not residents.
• I object to this development as it will 'join up' Send and Ripley and local character will be destroyed by this over development.
• I object that GBC continues to stand by its discredited and unreliable estimate for future housing need and fails to adjust this downwards by considering its erroneous assumption about student population forecasts in Guildford. This would of course impact on housing need across neighbouring areas including Send.

Attached documents:

Comment: MM41 - LPMM18/2278  Respondent: John Pyne 10840641  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

• I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM42 - LPMM18/2270  Respondent: John Pyne 10840641  Agent:

MM42 LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

• I object to the proposal that an industrial unit be developed in this area, and the failure to demonstrate need or benefit.
• I object to GBC proposing this development in the face of the Employment Land Needs Assessment showing a reduction in demand for industrial land. It is not desired nor justifiable.
• I object to GBC proposing building this site, without demonstrating special circumstances and contradicting MM9.
• I object to GBC proposing the development of industrial sites in the Green Belt where there is unused capacity at Slyfield.
• I object that this proposal, coupled with 25% increased at Send Business Centre means there is a much bigger concentration of such land use with no proven demand, and is both disproportionate and unfair when comparing Send with other villages.

Attached documents:

Comment: MM42 - LPMM18/2280  Respondent: John Pyne 10840641  Agent:
- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM44 - LPMM18/2272  Respondent: John Pyne 10840641  Agent:

MM44 LAND AT ALDERTON'S FARM, SEND MARSH ROAD, POLICY A63

- I object to the late inclusion of this site, deleted from an earlier draft due to the strength of local objections and that GBC ignore these by only re-inserting this proposal at the public examination in July. This late inclusion does not follow correct process or allow for legitimate consultation.
- I object to this development as it will contradict Government guidance in their proposals to build on Greenbelt land and because GBC fail to provide 'exceptional circumstances' to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
- I object that this development is proposed on Green Belt land and will destroy countryside.
- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
- I object because local infrastructure will not be able to support the additional demands of new residents.
- I object because wildlife will be displaced.
- I object because GBC continues to promote excessive and unnecessary housing demand, rather than allowing for open and democratic evaluation of housing need in the area.
- I object because this additional development will result in traffic and increased pressure on already over-utilised and traffic blocked roads in the village.
- I object because the proposal of adding 770 houses to our village (including 550 at Garlicks Arch, 60 at Clockbarn, 40 at Winds Ridge) is disproportionate and places excessive and unachievable demand on local services roads and the infrastructure and character of our village. The addition of 770 new houses to the current population of 1700 properties would be an increase of more than 45%. This cannot be accommodated by the existing infrastructure.

Attached documents:

Comment: MM48 - LPMM18/2282  Respondent: John Pyne 10840641  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM9 - LPMM18/2273  Respondent: John Pyne 10840641  Agent:

MM9 GREEN BELT POLICY
• I object to the GBC claim that they are protecting the Green Belt as this is highly subjective and exposing any land on the edge of our village for excessive and over-development.
• I object as the approach proposed will create significant opportunities for interested parties to undermine and erode the protections enshrined in the green belt designation and will certainly lead to the continued expansion of the settlement boundaries.
• I object to the wording of policy paragraph (1) as it is devoid of meaning. The paragraph states that "Inappropriate development will not be permitted unless very special circumstances can be demonstrated". Are we to understand that inappropriate development will be permitted in special circumstances? The paragraph goes on to state that "Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations". This is clearly nonsense masquerading as reason and provides no objective criteria for its application.
• I object to all proposals to build on Green Belt land in the borough and that GBC uses discredited and exaggerated housing 'need' data to support this. Urban brownfield areas could accommodate all the true and required development that is needed and such sites are close to existing transport systems and links. NO such infrastructure exists in our village.

Attached documents:

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**Comment:** MM27 - LPMM18/1245  **Respondent:** Rosemarie Haxton 10840769  **Agent:**

MM27, MM41, MM42, MM48 Transport Strategy

• This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.

Attached documents:

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**Comment:** MM41 - LPMM18/1241  **Respondent:** Rosemarie Haxton 10840769  **Agent:**

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

My objections to this proposal are

• This will join up the villages of Send and Ripley, losing their identity and causing over development.
• The excessive increase in cars and numbers of residents will block already busy roads, there are no school places as the local school in Ripley has already closed and the GP surgery is already overbooked
• 37% increase in houses is excessive and previous objections to a lesser number has been ignored, the local residents are not being listened to.

Attached documents:

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**Comment:** MM41 - LPMM18/1246  **Respondent:** Rosemarie Haxton 10840769  **Agent:**

MM27, MM41, MM42, MM48 Transport Strategy
• This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.

Attached documents:

Comment: MM42 - LPMM18/1242  Respondent: Rosemarie Haxton 10840769  Agent:

MM42 Land at Burnt Common, Policy A58

My objections to this proposal are:

• There is already unused industrial sites at Slyfield, the Employment Land Needs Assessment show the need for this type of land has reduced and a 25% increase at Send Business Centre negate the need for this type of development.
• It is on Green Belt land
• With Send Business Centre increase, it makes unnecessary concentrated increase in Send village which is not proposed in any other village.
• Increase in traffic will block already busy roads

Attached documents:

Comment: MM42 - LPMM18/1247  Respondent: Rosemarie Haxton 10840769  Agent:

MM27, MM41, MM42, MM48 Transport Strategy

• This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.

Attached documents:

Comment: MM44 - LPMM18/1243  Respondent: Rosemarie Haxton 10840769  Agent:

MM44 Land at Alderton’s Farm, Policy A63

My objections to this proposal are:

• This is Green Belt land and there are heritage centres at Send Marsh Green which will be affected
• Increase in traffic will block already busy roads and Send crossroads
• If Garlicks Arch, Clockbarn and Winds Ridge developments were to all go ahead, this would increase the number of houses by 45% with already insufficient infrastructure, including the GP surgery, school and facilities for the current 1700 homes in Send.

Attached documents:
MM27, MM41, MM42, MM48 Transport Strategy

- This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.

Attached documents:

MM9 Green Belt Policy

My objections to this proposal are:

- The modifications to the Green Belt policy actually leave it open to more development, not less, as it now becomes subjective reasoning open to abuse and misinterpretation so that it will no longer be protected.

Attached documents:

MM41, MM42, MM44, MM9, MM27 MM48

I am writing to object to plans for our village. I have lived here for 20 years and have seen traffic increase dramatically. I have to use the A3 up to M25 J10 most weekdays and it is perfectly clear that Send cannot cope with further traffic.

Increasing industrial areas and a massive increase in housing is completely the wrong thing for a village. We have a strong village feel in both Ripley and Send and I have lived in North London as a child and saw my village merge with the next one and eventually become part of London and it destroyed the area. I don’t want to see this happen here. There are some glorious greenbelt areas and ancient woodland and so there will be far better places to build that are brownfield sites.

I have already watched the Tannery Lane industrial area increasing in size. This is already a ridiculous place for an industrial site, right by the river along a narrow country lane and to increase the size is just not thought through!

I live on Send Marsh Road and building at Alderton’s will make an already dangerous and busy road, even worse. The sharp bend is very difficult to drive around and to cross over to get to Polesden Lane and with a dramatic increase in traffic, this would be impossible.

Along with Garlick’s Arch, Clockbarn, Winds Ridge etc, it is just too much for our infrastructure to bare. I have just had to wait 2 weeks for an appointment at the doctors and increased housing will just exacerbate the problem so that it is out of control.

My children were lucky enough to get into George Abbot school, but what do you intend doing with all the new children and associated traffic that so much building would create? Closing Ripley Primary was ill-thought out if you are intent on going ahead with this building, despite objections and the traffic at the Burntcommon roundabout to get to Send Primary will be ridiculous, especially if you’re considering building new slip roads to the A3 too.
So my main concerns are traffic congestion, destruction of the green belt, no provision for increased infrastructure such as doctors with so many new homes, increase in industrial space not appropriate for a village setting, over-development, flooding and a completely ignoring all previous objections!

Please reconsider destroying our villages of Send and Ripley. They will be destroyed if even a portion of this building goes ahead along with the modifications we are not able to object against such as the traveller’s site and Clockbarn etc. Please listen to your residents and think of the future of Surrey as a beautiful place to live and not just the financial advantages. In the long run, stopping this dense build up of population will save money, as the social problems in north London now, where I grew up are immense.

Attached documents:

Comment: MM41 - LPMM18/5840  Respondent: Yvonne Woozley 10843521  Agent:

MM41, MM42, MM44, MM9, MM27 MM48

I am writing to object to plans for our village. I have lived here for 20 years and have seen traffic increase dramatically. I have to use the A3 up to M25 J10 most weekdays and it is perfectly clear that Send cannot cope with further traffic.

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Attached documents:

Comment: MM48 - LPMM18/5844  Respondent: Yvonne Woozley 10843521  Agent: MM41, MM42, MM44, MM9, MM27 MM48

I am writing to object to plans for our village. I have lived here for 20 years and have seen traffic increase dramatically. I have to use the A3 up to M25 J10 most weekdays and it is perfectly clear that Send cannot cope with further traffic.

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Attached documents:

**Comment: MM41 - LPMM18/266  Respondent: Jackie Payne 10843585  Agent:**

I wish to object to the proposed serious over-development of Send.

MM41 - land at Garlicks Arch, Send Marsh, Policy A43

This land is Green Belt and also ancient woodland. The building of 550 homes on this land would have a chronic effect on the infrastructure around Send's already busy roads. There would be an additional 800 cars on the local roads from this development alone. The local schools and doctor's surgery can't cope currently, let alone if this development goes ahead. An increase from 400 - 550 houses is totally unreasonable. The infrastructure just can't cope with this level of development.

Attached documents:

**Comment: MM42 - LPMM18/267  Respondent: Jackie Payne 10843585  Agent:**

MM42 - land at Burnt Common, London Road, Send, Policy A58

There is no clear need to have new industrial sites in the Green Belt. Slyfield has unused capacity. Narrow surrounding roads will be choked with traffic and pollution. The Employment Land Needs Assessment showed a reduction in demand for industrial land.

Attached documents:

**Comment: MM44 - LPMM18/268  Respondent: Jackie Payne 10843585  Agent:**
MM44 - land at Alderton's Farm, Send Marsh Road, Policy A63

This is Green Belt land with no special circumstances so it contradicts policy MM9. There are some beautiful heritage buildings on Send Marsh Green and such a development will detract from this pretty village. There will be increased pressure on the Send crossroads at Mays Corner. This is already very busy in the mornings with commuters and school buses.

There were many objections to this proposal when it was raised before and it was taken out of the Local Plan and then somehow re-inserted in July 2018. All previous objections have been totally ignored.

The proposed development sites for Send and Send Marsh mean in increase of 45% for our village which is far too much for the infrastructure. There will be many many more cars heading to Woking and Guildford every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

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Comment: MM27 - LPMM18/4364  Respondent: Rosemary Key 10844641  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

Traffic management and infrastructure has not been properly addressed by the changes at the A3 slip roads, there needs to be a proper independent traffic impact analysis on the increase of traffic, through traffic as well as local due to the proposed increase in both housing and industrial estate development. The noise, pollution, delays and problems on the roads in these small poorly managed current roading has not been addressed in any documents provided to residents.

**Attached documents:**

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Comment: MM41 - LPMM18/4349  Respondent: Rosemary Key 10844641  Agent:

MM41 Garlicks arch Send Marsh Policy A43 for the following reasons:

The infrastructure within the area will not take the increase of the number of cars that will come out of the proposed housing numbers approximately 450 initially. We live in the area and have been waiting over 4 years for the current roads that will be impacted on to have the pot holes filled, the over all management of the street lighting and general repairs to the roads. We have seen no planing to support the infill of housing in this area. The impact on the small roads will be horrendous, traffic jams, accidents and delays within the Ripley and Send areas. Roads are too small to take this volume of expected traffic.

The joining of the two villages Ripley and Send will then create one large over developed area in an identified greenbelt area. The increase in proposed houses being built will surely be over development in this sensitive area.

Many thousands of objections have already been put to the Guildford Council and I wonder where these objections are now? Have they been disregarded? We voted the public committee members into position and they need to hear the voices of the electorate

**Attached documents:**
MM27 MM41 MM42 and MM48 Transport Strategy

Traffic management and infrastructure has not been properly addressed by the changes at the A3 slip roads, there needs to be a proper independent traffic impact analysis on the increase of traffic, through traffic as well as local due to the proposed increase in both housing and industrial estate development. The noise, pollution, delays and problems on the roads in these small poorly managed current roading has not been addressed in any documents provided to residents.

Attached documents:

Comment: MM42 - LPMM18/4355  Respondent: Rosemary Key 10844641  Agent:

MM42 Burnt Common, London Road, Send Policy A58

We have already had a significant increase in the industrial area within the above named areas. Again this is a small village environment yet it has had more than double the area than any other area has had put upon them. This again impacts on the sensitive, greenbelt area and we are all aware of the used SLYFIELD site that could be more utilised. As there are no special circumstances this seems more of a directive rather than a thoughtful, sensitive understanding of the environment being impacted upon.

Again the significant increase in traffic through small lanes, still unprepared from our last two winters of damage, will again cause more damage which the current council has been remiss in their duties to repair for current residents and through traffic a proposal to increase this through traffic and increase the local traffic on these roads needs to be seriously looked at.

When London is looking at reducing CO2 levels in their environment we are looking at increasing this through the significant increase of traffic, lorries and associated traffic in an area little set up to accommodate or support this increase.

Attached documents:

Comment: MM42 - LPMM18/4367  Respondent: Rosemary Key 10844641  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

Traffic management and infrastructure has not been properly addressed by the changes at the A3 slip roads, there needs to be a proper independent traffic impact analysis on the increase of traffic, through traffic as well as local due to the proposed increase in both housing and industrial estate development. The noise, pollution, delays and problems on the roads in these small poorly managed current roading has not been addressed in any documents provided to residents.

Attached documents:

Comment: MM44 - LPMM18/4358  Respondent: Rosemary Key 10844641  Agent:

MM44 Alderton's Farm, Send Marsh Road Policy A63
Why has a group of objections to this area being built on, suddenly be reinserted until a recent examination in July? This still remains a greenbelt area and as no changes have been put in place to this, it contradicts policy MM9.

The increase in housing will impact again on a poorly managed infrastructure that is currently under managed and struggling to cope with current traffic numbers and requirements.

**Attached documents:**

**Comment:** MM48  -  LPMM18/4369  **Respondent:** Rosemary Key 10844641  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

Traffic management and infrastructure has not been properly addressed by the changes at the A3 slip roads, there needs to be a proper independent traffic impact analysis on the increase of traffic, through traffic as well as local due to the proposed increase in both housing and industrial estate development. The noise, pollution, delays and problems on the roads in these small poorly managed current roading has not been addressed in any documents provided to residents.

**Attached documents:**

**Comment:** MM9  -  LPMM18/4361  **Respondent:** Rosemary Key 10844641  **Agent:**

**MM9 Green Belt Policy**

Is the green belt a greenbelt or is it something that the Guildford council is negating and leaving future development/speculators possibly using loopholes - ineffective legislation to safe guard the greenbelt which was set up to ensure mass housing did not occur around the outer London areas, of which Ripley, Send Marsh and Garlicks Arch are part of.

**Attached documents:**

**Comment:** Other comments -  LPMM18/4372  **Respondent:** Rosemary Key 10844641  **Agent:**

**Other Developments**

A further 40 houses and a travellers site on Send Hill, 60 house at the Clockbarn Tannery Lane and the increase of industrial development in the Send Business Centre will again create massive impact on the traffic through small lanes poorly maintained by the current processes run by the Guildford Council. Again this area is meant to be protected under the Wey Conservation area.

We ask the question why two small villages are being asked to carry the weight of excessive housing numbers and incredible increase in industrial area requirements when there are many other sites still under developed and able to absorb most of what is being proposed.

We the locals, understand the need for housing but this must be done in consultation with the local villages it will impact most upon and the council needs to ensure the infrastructure can support the development before it is built rather than after when all is chaos and too late to prevent.
Comment: MM41 - LPMM18/4592  Respondent: James Purkiss 10844673  Agent:

I object to MM41 for the following reasons; the number of houses proposed is far too many, infrastructure including roads, schools etc. is insufficient and there are no plans to address this.

Attached documents:

Comment: MM42 - LPMM18/4593  Respondent: James Purkiss 10844673  Agent:

I object to MM42 for the following reasons; there is no evidence of the need for additional industrial space in this area, the roads accessing this area are woefully inadequate, it bewilders me how the planning officers justify this plan.

Attached documents:

Comment: MM44 - LPMM18/4594  Respondent: James Purkiss 10844673  Agent:

I object to MM44 for the following reason; too much new housing for a little village, it will increase traffic beyond what these little roads can take, pollution is already bad enough, the green belt is not for development even if its the council who wants to do it.

Attached documents:

Comment: MM9 - LPMM18/4591  Respondent: James Purkiss 10844673  Agent:

It has become evident that GBC planners are attempting to exhaust the local residents with dozens of plans and modifications in the hope that we will let them do as they please with our villages and tire of objecting to these clearly ill conceived plans.

The thousands upon thousands of objections and strong opposition should show that this is nothing to do with nimbysim but fear for our communities.

I strongly object to any underhanded council attempt to reclaim our green belt to sell land to developers. I do appreciate that as housing needs grow we must find new space to accommodate. I support the use of Wisley airfield for housing.

I do support adding additional exit and entry points to the A3 in the hope it will alleviate the pressure on Ripley village.

I object to MM9 as I have stated there is no need to pillage the green belt, it is there for a reason despite it not being convenient for GBC. There are no valid exceptions.
I wish to make comment on Policy S2

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year.

After this Barton Willmore, Consultancy, has found that the correct figure should be 431. Following on from this, September data from the Office for National Statistics, which carries out population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year.

It seems that the Local Plan is inaccurate.

Conclusion:

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites. GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

Please explain why thousands of previous objections are ‘not relevant’ this time round? How difficult can it be for GBC to listen to the people who know the area best - the residents? The whole process of this Local Plan has been a farce. I suggest GBC take note of local residents concerns and objections before the implications are borne out at the next council election.

I am not completely against development, but I oppose development without thought and consideration for the basics, and which will be detrimental for the area.

Attached documents:

Comment: MM2 - LPMM18/2571  Respondent: John Wright 10844929  Agent:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

Comment: MM41 - LPMM18/2563  Respondent: John Wright 10844929  Agent:

I wish my comments to be seen by the Planning Inspector
I object to the following specific modifications to the Local Plan:

Policy A43, Land at Garlicks Arch, Send Marsh (Modification MM41)

I object to modifications MM41 Land at Garlicks Arch due to the following points.

An increase of 37% in housing numbers is excessive and will result in urban sprawl and the neighbouring villages merging into one another. It constitutes over development. These further additions to the housing numbers are not required.

It is an unsustainable location. It will undoubtedly cause traffic chaos on the minor surrounding roads. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, anyone who lives in these areas will confirm that this is the case. Substantially more vehicle movements will result in even more congestion and greater pollution. Residents and the environment will suffer as a result.

This green belt land contains ancient woodland dating back to the 16th century, which should be preserved. There is no good reason to tamper with it with additional housing numbers.

An extra 150 houses means easily an extra 300 cars on the local roads, which cannot be accommodated.

This site is identified as being in a Flood Zone 2 and regularly floods during winter months.

This site contains land which is heavily contaminated by many years of shooting with lead shot.

The local school and medical facilities won’t be able to accommodate extra housing. It is already at maximum capacity (not helped by the feeble decision to close Ripley school).

Above all, the latest changes to this site have completely ignored the thousands of previous comments from residents (who know the area best of all) during the previous consultations.

Attached documents:

Comment: MM41 - LPMM18/2568  Respondent: John Wright 10844929  Agent:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

Comment: MM42 - LPMM18/2564  Respondent: John Wright 10844929  Agent:

Policy A58 Land at BurntCommon (Modification MM42)

I object to modifications MM42 Land at Burnt Common due to the following points:
There is no requirement for new (and certainly not increased) industrial or warehouse space as there is ample availability at Slyfield and Guildford Industrial estates, developing in this way is pure stupidity and is just building for the sake of it.

Additionally, this site is in the Green Belt, there are no exceptional circumstances to justify development here.

This proposal completely contradicts the statement MM9 makes.

According to the latest Employment Land Needs Assessment there is a reduction in demand for industrial land in the whole borough. Everywhere you look around the borough there are empty industrial buildings! Again…pure stupidity.

Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

Any extra traffic would cause traffic chaos in the local area with its small roads, adding commercial vehicles to this would be completely unsustainable.

After this site was deleted from the 2014 Local Plan due to massive objections, it has now been re introduced and doubled in size, farcical, especially on top of a 25% increase in size of Send Business Centre. This results in an excessive concentration in this village than any other in the borough. And there’s no requirement for it!

Attached documents:

Comment: MM42 - LPMM18/2569  Respondent: John Wright 10844929  Agent:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

Comment: MM44 - LPMM18/2565  Respondent: John Wright 10844929  Agent:

Policy A63 Land at Aldertons Farm, Send Marsh Road (Modification MM44)

I object to modifications MM44 Land at Aldertons due to the following points:

This site is in the Green Belt, there are no exceptional circumstances to justify development here so it contradicts Policy MM9.

This site is located close to listed historic buildings at Send Marsh Green and any development here would be too modern, and without a doubt designed so badly that it would ruin the rural character of the whole area. I cannot think of a modern development that doesn’t stand out like a sore thumb and looks totally out of place.

The inevitable extra traffic would cause increased congestion at Send Mays Corner crossroads. Combined with the extra traffic on the Send Road due to the other increases at Garlicks Arch and Burntcommon, and the whole area would become unsustainable.
With the proposed extra numbers of houses at Garlicks Arch & Clockbarn sites it would overcome the current infrastructure.

This site was sensibly removed from an earlier version of the Local Plan, and was re introduced in July. Why?

Attached documents:

Comment: MM48 - LPMM18/2570  Respondent: John Wright 10844929  Agent:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

Comment: MM9 - LPMM18/2566  Respondent: John Wright 10844929  Agent:

I object to Modification MM9 Green Belt Policy due to the following points:

The modifications in this policy are supposed to protect the Green Belt. However in reality, they allow ‘limited infilling outside the identified settlement boundary’ in certain circumstances. In other words, a loophole which allows indiscriminate development.

Attached documents:

Comment: MM1 - LPMM18/1853  Respondent: Mrs Natasha Lock 10845377  Agent:

There is no justification for taking these sites out of greenbelt, there are many other sites in Surrey that are brownfield that could be built on instead. This plan will completely change East and West Horsley with no infrastructure in place to cope with the added population that the development will bring. Our roads flood on a regular basis and they too will not cope with the extra houses planned for our village.

Attached documents:

Comment: MM51 - LPMM18/1873  Respondent: Mrs Natasha Lock 10845377  Agent:

There is no justification for taking land in The Horsley out of the greenbelt. There are many more sites within Surrey that are brownfield that could be built on instead. There is no plan for any infrastructure to support these extra homes and our
village will not cope with the extra population. We already have a busy station, doctors and our roads flood whenever there is rain. It is unnecessary to build on areas of green beauty when other options are available.

Attached documents:

Comment: MM27 - LPMM18/378  Respondent: John Ford 10846241  Agent:

It is with extreme disappointment that I have to, yet again, protest against the over development of Send. It beggars belief that the Planning Inspectorate in collusion with GBC have increased the number of properties planned for the village (as per the refs. above).

Do the PI and GBC not recognise the damage this will do to the infrastructure of this area? At the same time I understand there will be some incursion onto Green Belt land which contradicts Green Belt Policy.

I hope that the Local Plan is reviewed to allow Send to be relieved of the developments planned and more suitable sites found.

Attached documents:

Comment: MM41 - LPMM18/373  Respondent: John Ford 10846241  Agent:

It is with extreme disappointment that I have to, yet again, protest against the over development of Send. It beggars belief that the Planning Inspectorate in collusion with GBC have increased the number of properties planned for the village (as per the refs. above).

Do the PI and GBC not recognise the damage this will do to the infrastructure of this area? At the same time I understand there will be some incursion onto Green Belt land which contradicts Green Belt Policy.

I hope that the Local Plan is reviewed to allow Send to be relieved of the developments planned and more suitable sites found.

Attached documents:

Comment: MM42 - LPMM18/374  Respondent: John Ford 10846241  Agent:

It is with extreme disappointment that I have to, yet again, protest against the over development of Send. It beggars belief that the Planning Inspectorate in collusion with GBC have increased the number of properties planned for the village (as per the refs. above).

Do the PI and GBC not recognise the damage this will do to the infrastructure of this area? At the same time I understand there will be some incursion onto Green Belt land which contradicts Green Belt Policy.

I hope that the Local Plan is reviewed to allow Send to be relieved of the developments planned and more suitable sites found.
### Comment: MM44 - LPMM18/375  **Respondent:** John Ford 10846241  **Agent:**

It is with extreme disappointment that I have to, yet again, protest against the over development of Send. It beggars belief that the Planning Inspectorate in collusion with GBC have increased the number of properties planned for the village (as per the refs. above).

Do the PI and GBC not recognise the damage this will do to the infrastructure of this area? At the same time I understand there will be some incursion onto Green Belt land which contradicts Green Belt Policy.

I hope that the Local Plan is reviewed to allow Send to be relieved of the developments planned and more suitable sites found.

### Attached documents:

### Comment: MM48 - LPMM18/376  **Respondent:** John Ford 10846241  **Agent:**

It is with extreme disappointment that I have to, yet again, protest against the over development of Send. It beggars belief that the Planning Inspectorate in collusion with GBC have increased the number of properties planned for the village (as per the refs. above).

Do the PI and GBC not recognise the damage this will do to the infrastructure of this area? At the same time I understand there will be some incursion onto Green Belt land which contradicts Green Belt Policy.

I hope that the Local Plan is reviewed to allow Send to be relieved of the developments planned and more suitable sites found.

### Attached documents:

### Comment: MM9 - LPMM18/377  **Respondent:** John Ford 10846241  **Agent:**

It is with extreme disappointment that I have to, yet again, protest against the over development of Send. It beggars belief that the Planning Inspectorate in collusion with GBC have increased the number of properties planned for the village (as per the refs. above).

Do the PI and GBC not recognise the damage this will do to the infrastructure of this area? At the same time I understand there will be some incursion onto Green Belt land which contradicts Green Belt Policy.

I hope that the Local Plan is reviewed to allow Send to be relieved of the developments planned and more suitable sites found.

### Attached documents:
POLICY S2

I object that the figure for Guildford Borough housing need used by the Inspector was 789 per annum. This has been discredited as shown to be a high over-estimate and therefore is an unreliable and irrelevant basis on which to plan housing for the area.

I object that GBC is using failing to acknowledge and amend their discredited figure of 789 per annum when Barton Willmore – a respected consultancy – has said that the correct figure should be 4311.

I object that GBC is not considering relevant data when proposing housing need and this will impact on and encourage excessive development in Send and destroy our village and its character.

I object that GBC is proposing to amend its housing need by considering September data from the OFFICE FOR NATIONAL STATISTICS which suggests that appropriate growth for Guildford Borough can be achieved with 460 houses a year.

I object that GBC fails to take into account publicly available data which proposes a much lower number of housing need for our borough and village and - in opposition to the sustained and numerous objections from residents - instead proposes numbers and developments which would please only house builders and developers.

footnote:

1. At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are hugely less than the total assumed by the Inspector. This could make a massive difference to developments in Send.

Attached documents:

Comment: MM27 - LPMM18/3323  Respondent: Frank Drennan 10846625  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM41 - LPMM18/3318  Respondent: Frank Drennan 10846625  Agent:

RE: Objections to Guildford Borough Council (GBC) Local Plan – Consultation due to close on 23.10.2018.

I am writing in response to the latest version of the Local Plan as outline in GBC-LPSS-026. This letter is in addition to that submitted on behalf of my wife via my email of the 18th of October. As we share the same views and objections I have maintained the same arguments, and am submitting this further letter to ensure that my objections are separately registered.
As in earlier versions of the plan, the modifications presented for Send are inappropriate, excessive and will be highly detrimental to our village, our quality of life and our future. These changes will result in irreversible destruction of our village. It is clear from the latest ONS data (as highlighted in the footnote on page 4) that the case for this level of development is weak. It is fundamental to the effective workings of our public institutions, and the trust the public has in these, that decisions are made taking proper accounts of the objective facts. My objections are not against development per se, but against this excessive level of development that is being belligerently advanced on discredited data.

The local plan in its current form illustrates the continued failure of GBC to provide a plan that is fit for purpose, supported by competent data made available in the public domain, which provides for the needs of current residents, and secures the best future for them and LISTENS TO LOCAL VOICES.

**MM41 LAND AT GARLICK’S ARCH, SEND MARCH, POLICY A43**

- I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide ‘exceptional circumstances’ to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
- I object that this development is proposed on Green Belt Land and will destroy countryside and ancient woodland.
- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
- I object because local infrastructure will not be able to support the additional demands of new residents.
- I object because local schools and medical facilities will not be able to support the massive increase in demands resulting from this plan.
- I object because wildlife will be displaced.
- I object because the site is subject to frequent flood, which will only worsen with increased buildings and ground coverage.
- I object because the land is contaminated by lead shot and this will compound the problem of increased flooding as outline in my previous objection and be detrimental to health and well-being.
- I object to GBC ignoring the 7,000 previous objections raised by local residents with regard to developing this area.
- I object to GBC increasing by 37% the number of houses in this development, which is excessive and not supported by need but demand and proposed to promote excessive and unnecessary housing development in this area.
- I object to this development as it will ‘join up’ Send and Ripley and local character will be destroyed by this over development.
- I object that GBC continues to stand by its discredited and unreliable estimate for future housing need and fails to adjust this downwards by considering its erroneous assumption about student population forecasts in Guildford. This would of course impact on housing need across neighbouring areas including Send.

**Attached documents:**

**Comment:** MM41 - LPMM18/3324  **Respondent:** Frank Drennan 10846625  **Agent:**

**MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY**

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

**Attached documents:**
MM42 LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

- I object to the proposal that an industrial unit be developed in this area, and the failure to demonstrate need or benefit.
- I object to GBC proposing this development in the face of the Employment Land Needs assessment showing a reduction in demand for industrial land. It is not desired nor justifiable.
- I object to GBC proposing building this site, without demonstrating special circumstances and contradicting MM9.
- I object to GBC proposing the development of industrial sites in the Green Belt where there is unused capacity in Slyfield.
- I object that this proposal, coupled with 25% increase at Send Business Centre means there is a much bigger concentration of such land use with no proven demand, and is both disproportionate and unfair when comparing Send with other villages.

Attached documents:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

MM44 LAND AT ALDERTON’S FARM, SEND MARSH ROAD, POLICY A63

- I object to the late inclusion of this site, deleted from an earlier draft due to the strength of local objections and that GBC ignore these by only re-inserting this proposal at the public examination in July.
- I object to this development as it will contradict Government guidance in their proposals to build on Greenbelt land and because GBC fail to provide ‘exceptional circumstances’ to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
- I object that this development is proposed on Green Belt Land and will destroy countryside.
- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
- I object because local infrastructure will not be able to support the additional demands of new residents.
- I object because wildlife will be displaced.
- I object because GBC continues to promote excessive and unnecessary housing demand, rather than allowing for open and democratic evaluation of housing need in the area.
- I object because this additional development will result in traffic and increased pressure on already over-utilised and traffic blocked roads in the village.
- I object because the proposal of adding 770 houses to our village (including 550 at Garlicks Arch, 60 at Clockbarn, 40 at Winds Ridge) is disproportionate and places excessive and unachievable demand on local services roads and the infrastructure and character of our village. The addition of 770 new houses to the current
population of 1700 properties would be an increase of more than 45%. This cannot be accommodated by the existing infrastructure.

**Comment:** MM48 - LPMM18/3326  **Respondent:** Frank Drennan 10846625  **Agent:**

**MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY**

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

**Comment:** MM9 - LPMM18/3321  **Respondent:** Frank Drennan 10846625  **Agent:**

**MM9 GREEN BELT POLICY**

- I object to the GBC claim that they are protecting the Green Belt as this is highly subjective and exposing any land on the edge of our village for excessive and overdevelopment.
- I object as the approach proposed will create significant opportunities for interested parties to undermine and erode the protections enshrined in the green belt designation and will certainly lead to the continued expansion of the settlement boundaries.
- I object to the wording of policy paragraph (1) as it is devoid of meaning. The paragraph states that “Inappropriate development will not be permitted unless very special circumstances can be demonstrated”. Are we to understand that inappropriate development will be permitted in special circumstances? The paragraph goes on to state that “Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. This is clearly nonsense masquerading as reason and provides no objective criteria for its application.

**Comment:** MM2 - LPMM18/4569  **Respondent:** Amanda McDougall 10850625  **Agent:**

The Local Plan is unsound because:

1. It lacks simple guidelines for mass and scale to protect Guildford from further inappropriate developments of an excessive height such as the Solum station development. It is unacceptable to allow such a lacuna in protection whilst awaiting adoption of a Development Management DPD in several years’ time.

3. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

4. Housing numbers should reflect the latest ONS figures and projections; these are lower than the previous figures which the Council is using.
Attached documents:

**Comment: MM3 - LPMM18/4570  Respondent: Amanda McDougall 10850625  Agent:**

2. The town centre policy does not address the infrastructure deficit, in particular the traffic congestion.

Attached documents:

**Comment: MM41 - LPMM18/4572  Respondent: Amanda McDougall 10850625  Agent:**

6. The Council’s proposals rely on A3 improvements and, as these are beyond the Council’s control, the Council cannot deliver their proposals.

Attached documents:

**Comment: MM9 - LPMM18/4571  Respondent: Amanda McDougall 10850625  Agent:**

5. The grounds for green belt development are invalid because the Council has not demonstrated ‘exceptional circumstances’

Attached documents:

**Comment: MM2 - LPMM18/1522  Respondent: Andrea Wright 10851425  Agent:**

I wish to make the following comments and reservations about the local plan, especially in relation to MM2:

1) I am very disappointed that the Council has not fully exploited the opportunities within the town centre and other brownfield sites before turning its development thoughts to our precious green belt. Developers will always jump at the chance to develop green belt but the Council seem to believe that they cannot guide where development takes place and therefore has to offer Green belt when there are so many brown field sites in the area.

2) The new developments proposed on the green belt rely heavily on significant improvement being made to the A3. Whilst there has been talk for some time about the A3 being improved nothing has happened and the Council has no control over these improvements. It would seem particularly short sighted to offer prime green belt land for sale when the infrastructure is not there to support it.

3) New housing projections released from the ONS show a significant reduction in the proposed number of new homes required for the Guildford area. The enquiry should be re-opened as a matter of urgency so that these new targets and their impact on the plan can be reassessed. Guildford has also been forced to pick up extra housing from Woking whose council appears to have decided not to build on their green belt - their housing target has also been reduced. We run the risk of losing our precious green belt to provide housing above and beyond what is actually required. Once it is gone it is
gone. The new numbers must be taken into account and the plan adjusted to reflect this. NO BUILDING ON GREEN BELT unless absolutely no other opportunities are available. Th enquiry MUST be re-opened to assess the impact of these new and significantly lower figures.

4) Building on green belt should only be done in exceptional circumstances. I do not believe that the plan meets these exceptional circumstances and all effort should be targeted at ensuring these areas are protected, and brownfield sites used first.

Attached documents:

Comment: MM2 - LPMM18/4780  Respondent: S Freeland 10852065  Agent:

I object to the building of more houses in Send. I have lived in the village all my life and have seen it built up enough already. You cannot cross the main road now. With more traffic it will be impossible. Schools and medical facilities are over stressed now.

Taking all the lovely greenbelt.

Attached documents:

Comment: MM27 - LPMM18/493  Respondent: Evan Parry-Morris 10853249  Agent:

2. I wish to raise the following objections to the Guildford Local Plan MM27, MM41, MM42, MM48:

Many local roads around the villages of Send, Ripley and Clandon are narrow and there are already many instances of vehicles having to mount pavements to allow large vehicles to pass. This is particularly an issue on the A247 between Burnt Common and Clandon Crossroads. The inclusion of the Garlick’s Arch proposal, particularly the industrial and warehousing elements of the plan, is certain to make the situation far worse. I object to the development proposed in the local plan, which will result in more traffic using narrow roads.

Many of the villages are suffering from severe congestion, for example the Shell roundabout at Burnt Common, and the Newark Road & Rose Lane junction in Ripley. I object to the further development which will cause further congestion in and around our villages.

The A3 and M25 already suffer from severe congestion during rush hours, in addition, Highways England have no plans to improve the A3 prior to 2020. I object to the development of these sites shown in the local plan because trunk roads would be unable to cope.

Attached documents:

Comment: MM41 - LPMM18/494  Respondent: Evan Parry-Morris 10853249  Agent:

2. I wish to raise the following objections to the Guildford Local Plan MM27, MM41, MM42, MM48:
Many local roads around the villages of Send, Ripley and Clandon are narrow and there are already many instances of vehicles having to mount pavements to allow large vehicles to pass. This is particularly an issue on the A247 between Burnt Common and Clandon Crossroads. The inclusion of the Garlick’s Arch proposal, particularly the industrial and warehousing elements of the plan, is certain to make the situation far worse. I object to the development proposed in the local plan, which will result in more traffic using narrow roads.

Many of the villages are suffering from severe congestion, for example the Shell roundabout at Burnt Common, and the Newark Road & Rose Lane junction in Ripley. I object to the further development which will cause further congestion in and around our villages.

The A3 and M25 already suffer from severe congestion during rush hours, in addition, Highways England have no plans to improve the A3 prior to 2020. I object to the development of these sites shown in the local plan because trunk roads would be unable to cope.

Attached documents:

Comment: MM41 - LPMM18/497  Respondent: Evan Parry-Morris 10853249  Agent:

3. I wish to raise the following objections to the Guildford Local Plan MM41, Policy A43:

The increase in the number of houses by 37% is excessive.

The large number of previous objections (about 7000) have been ignored.

It is green belt land containing ancient woodland.

The site is contaminated and is subject to frequent flooding.

The increase in the number of cars, perhaps in excess of 800, will block adjacent roads.

Many local health services, such as the Villages Medical Centre, Send, are being stretched already, and it’s becoming more difficult to get doctor/nurse appointments without unacceptable delays. This would become significantly worse should the draft local plan be implemented. I object to the additional stress that would be caused should the proposals be implemented.

It will join Send and Ripley and constitute over-development.

Attached documents:

Comment: MM42 - LPMM18/495  Respondent: Evan Parry-Morris 10853249  Agent:

2. I wish to raise the following objections to the Guildford Local Plan MM27, MM41, MM42, MM48:

Many local roads around the villages of Send, Ripley and Clandon are narrow and there are already many instances of vehicles having to mount pavements to allow large vehicles to pass. This is particularly an issue on the A247 between Burnt Common and Clandon Crossroads. The inclusion of the Garlick’s Arch proposal, particularly the industrial and warehousing elements of the plan, is certain to make the situation far worse. I object to the development proposed in the local plan, which will result in more traffic using narrow roads.
Many of the villages are suffering from severe congestion, for example the Shell roundabout at Burnt Common, and the Newark Road & Rose Lane junction in Ripley. I object to the further development which will cause further congestion in and around our villages.

The A3 and M25 already suffer from severe congestion during rush hours, in addition, Highways England have no plans to improve the A3 prior to 2020. I object to the development of these sites shown in the local plan because trunk roads would be unable to cope.

Attached documents:

Comment: MM42 - LPMM18/498  Respondent: Evan Parry-Morris 10853249  Agent:

4. I wish to raise the following objections to the Guildford Local Plan MM42, Policy A58:

There is no need for a new industrial development on green belt land, especially as Slyfield has unused capacity.

The minimum 14,800 sq m of industrial and storage areas is by far the largest industrial allocation in the borough, and is far too big for the area.

It would be expected that local roads would be gridlocked, with resultant dangerous pollution.

Attached documents:

Comment: MM44 - LPMM18/499  Respondent: Evan Parry-Morris 10853249  Agent:

5. I wish to raise the following objections to the Guildford Local Plan MM44, Policy A63:

This is green belt land, and there are no special circumstances for the building of 120 homes.

The resultant increase in traffic would cause issues at Send crossroads.

Attached documents:

Comment: MM48 - LPMM18/496  Respondent: Evan Parry-Morris 10853249  Agent:

2. I wish to raise the following objections to the Guildford Local Plan MM27, MM41, MM42, MM48:

Many local roads around the villages of Send, Ripley and Clandon are narrow and there are already many instances of vehicles having to mount pavements to allow large vehicles to pass. This is particularly an issue on the A247 between Burnt Common and Clandon Crossroads. The inclusion of the Garlick’s Arch proposal, particularly the industrial and warehousing elements of the plan, is certain to make the situation far worse. I object to the development proposed in the local plan, which will result in more traffic using narrow roads.
Many of the villages are suffering from severe congestion, for example the Shell roundabout at Burnt Common, and the Newark Road & Rose Lane junction in Ripley. I object to the further development which will cause further congestion in and around our villages.

The A3 and M25 already suffer from severe congestion during rush hours, in addition, Highways England have no plans to improve the A3 prior to 2020. I object to the development of these sites shown in the local plan because trunk roads would be unable to cope.

Attached documents:

Comment: MM9 - LPMM18/492  Respondent: Evan Parry-Morris 10853249  Agent:

1. I wish to raise the following objections to the Guildford Local Plan MM9:

Green belt is not being protected if ‘very special circumstances’ are allowed. Preservation of green belt is sacrosanct. There are no special circumstances for the removal of green belt. I object to the proposals for the removal of Send, Ripley and Clandon from green belt. Once taken, the green belt is forever lost.

Attached documents:

Comment: MM41 - LPMM18/282  Respondent: Sian Holwell 10854241  Agent:

MM41 Garlicks Arch.  Despite over 7,000 objections to 400 homes, the plan is now for 550. The initial plan of building 400 homes seemed excessive to say the least given the immense strain it would place on local infrastructure and the lack of plans to develop nearby roads and services. To increase the development to 550 homes seems short-sighted at best and suggests you don’t care for the views of local people or the quality of the environment that you will be creating for residents (both existing and new)

Attached documents:

Comment: MM42 - LPMM18/283  Respondent: Sian Holwell 10854241  Agent:

MM42 Burnt Common. Why is there a need for further industrial and storage sites in the area when there is unused capacity at Slyfield Green, a purpose built industrial estate away from houses and where expansion should be focused. It should be noted that Send has already increased its business centre by 25% with no proven demand.

Attached documents:

Comment: MM44 - LPMM18/284  Respondent: Sian Holwell 10854241  Agent:
**MM44 Alderton’s Farm.** Why has this been re-added after its prior removal due to objections. The current plans include the addition of 1700 homes in Send that's an increase of 45%. We simply don't need all these new houses....have you seen how many "for sale" boards are up in the area and very few properties are being sold. The economy is grinding to a halt and building all these houses will not help.

I am of the firm opinion that the Guildford Planning Inspector clearly does not live in this area and so does not care about the mess that is being proposed for the people who live here.

**Attached documents:**

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**Comment:** MM9 - LPMM18/281  **Respondent:** Sian Holwell 10854241  **Agent:**

Having received so many written objections to the previous plans, did you seriously feel the villagers of Send would not continue to save their village and environment. The Surrey infrastructure as a whole is at breaking point to say the least and so increasing the traffic whether by increasing the number of houses or industrial/storage space is absolutely stupid.

Clearly the Planning Inspector is ignoring the **Green Belt** (MM9) and under no circumstances can the actions proposed be said to be protecting it. Your plans are inviting developers and speculators to purchase land for development..

**Attached documents:**

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**Comment:** MM2 - LPMM18/5170  **Respondent:** J O'Byrne 10855265  **Agent:**

1) I think it is imperative to implement the plan ASAP to be able to have control over our borough’s planning applications. Any plan is better than none in that regard and I believe as much care as possible has been taken to outline what the relevant needs are and what can be done against the relevant constraints.

2) In terms of the main conurbations proposed - I.e. Gosden Hill Farm, Wisley Airfield and the site running up to the A31? - I think concentration on one site at a time would be sensible so that the relevant infrastructures I.e. schools, shops, doctors can be put in and a community formed. The proposed distribution of building numbers across all sites would not allow that and I would be concerned the numbers of affordable (I prefer low cost) accommodation can be provided.

3) Sites are identified for possible self-build projects but I think there should be a commitment within the plan to support community led housing and the development of community land trusts. I think this is especially pertinent for additions to village boundaries. This allows for community involvement and perhaps then less objections. There are many positive examples of this approach in the country - see Cambridge. Your own land, development company, ability to raise funds and ability to coordinate efforts can ensure low cost housing into perpetuity.

4) I would want to see the council use the developments as a vehicle for local resources, businesses and people. This is an opportunity for employment / apprenticeships and stimulating the local economy. I would like to see this kind of approach embedded in the plan.

**Attached documents:**

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**Comment:** MM3 - LPMM18/5171  **Respondent:** J O'Byrne 10855265  **Agent:**

1049 of 2554
5) Changes to retail impact on town centre plans and I understand the need for refreshing approaches. Look to encourage local business and cooperatives to keep money within the town. It would be great to be able to compel land owners to proceed with developments in the town e.g. the land at the bottom of the Portsmouth Road opposite The Mount which has just been growing budleahs for years and the empty properties in the triangle between Leapale Road and Woodbridge Road.

6) Anything that can be done to resolve traffic problems is to be welcomed! I like the ideas of the Guildford Vision Group for changing the roads in the town.

**Attached documents:**

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**Comment: MM27 - LPMM18/2190  Respondent: Susan Mansbridge 10855297  Agent:**

MM27 MM41 and MM48 Transport Strategy

I OBJEKT to what appears to be a lack of common sense to how the traffic situation can be solved, the infrastructure is just not there to be able to cope.

**Attached documents:**

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**Comment: MM41 - LPMM18/2186  Respondent: Susan Mansbridge 10855297  Agent:**

MM41 Land at Garlicks Arch, Send Marsh. Policy A43

I OBJEKT to the number of houses to be built at Garlicks Arch, an increase of 37% of properties will mean a great number of extra vehicles blocking all adjacent roads.

The area is well known for flooding.

Like the rest of Send any traffic problems that occur on the A3 bring the village to a halt due to the traffic being diverted through our village this also causes hold-ups in Old Woking.

Send Barns Lane already has busy traffic due to parents bringing and collecting their children each day to school.

How will the schools cope with extra pupils and our village Medical Centre cope with extra patients, they are already under a great deal of strain.

**Attached documents:**

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**Comment: MM41 - LPMM18/2191  Respondent: Susan Mansbridge 10855297  Agent:**

MM27 MM41 and MM48 Transport Strategy

I OBJEKT to what appears to be a lack of common sense to how the traffic situation can be solved, the infrastructure is just not there to be able to cope.
**Comment:** MM42 - LPMM18/2187  **Respondent:** Susan Mansbridge 10855297  **Agent:**

MM42 Land at Burnt Common, London Road, Send, Policy A58.

I OBJECT to the large new industrial and storage allocation this is on top of a 25% increase at Send Business Centre.

**Attached documents:**

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**Comment:** MM44 - LPMM18/2188  **Respondent:** Susan Mansbridge 10855297  **Agent:**

MM44 Land at Alderton's Farm, Send Marsh Road Policy A6

I OBJECT to more houses being built on this very narrow village road, once again how will the villages cope with the traffic? This is a Green Belt site.

**Attached documents:**

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**Comment:** MM48 - LPMM18/2192  **Respondent:** Susan Mansbridge 10855297  **Agent:**

MM27 MM41 and MM48 Transport Strategy

I OBJECT to what appears to be a lack of common sense to how the traffic situation can be solved, the infrastructure is just not there to be able to cope.

**Attached documents:**

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**Comment:** MM9 - LPMM18/2189  **Respondent:** Susan Mansbridge 10855297  **Agent:**

MM9 Green Belt Policy

I OBJECT to the modifications of that GBC want to make to the Green Belt boundaries, as this negate Green Belt protection.

**Attached documents:**

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**Comment:** MM41 - LPMM18/2760  **Respondent:** Imelda Rider 10855329  **Agent:**
I would like to object to the Main Modifications to the Guildford Local Plan.

MM41 Garlicks Arch - I object to 550 houses in this Green Belt site. It will create considerable traffic congestion for existing and new residents, and local shops, schools and doctors are insufficient to meet increased demand. Morning and evening traffic will increased considerably, impacting journey times and the environment.

Attached documents:

Comment: MM42 - LPMM18/2761  Respondent: Imelda Rider 10855329  Agent:

MM42 Burnt Common - I Object to the doubling in size of this proposed commercial site on Greenbelt site. It will increase trucks etc using the small roundabout at A247/B2215 causing further delays in what is already a busy and often congested roundabout. It would be better to expand existing commercial sites that have the infrastructure to cope with trucks etc.

Attached documents:

Comment: MM44 - LPMM18/2762  Respondent: Imelda Rider 10855329  Agent:

MM44 Alderton Farm - I object to the return of this Greenbelt housing development to the Guildford Local Plan. 120 houses will put an impossible demand on Send Marsh Road and Polesden Lane - the only entry/exit roads for this site. Polesden Lane is narrow with passing places - there is no way it can cope with 120 extra households. With neighbouring proposed developments, local medical & school infrastructure will not be cope with big increase in demand

Attached documents:

Comment: MM41 - LPMM18/156  Respondent: Emma Tallick 10855553  Agent:

I would like to register my objections to the current planning for additional developments around Send Village.

In particular I would like to object to the developments MM44 and MM41.

As well as impacting on the heritage of the area around Send Marsh Green, MM44 also contradicts the Green Belt policy of MM9. This land has always been listed as green belt land and therefore other non-green belt sites should be considered before developing this green belt land. In addition, the whole area around Send is at full capacity for what the current infrastructure can support, this includes:-

Roads
Schools
Doctors
Dentists

Send Villages Medical Practice is full, takes many days if not weeks to get a Doctor's appointment. Ripley has now lost is local primary school and only has one small dentist practice. The roads around this area are heavily congested at all times and safety is becoming an issue as more and more major accidents are happening on the A3 section parallel to the Send/
Ripley area as well as parking being pretty non-existent during peak times. With no local schools being able to take a large influx of new residents, this would result in yet more traffic as new residents would have to drive their children to distant schools outside of the local area.

Therefore, without substantial additional infrastructure to support the above, this area cannot support any more additional housing as shown in MM44 and MM41.

Attached documents:

**Comment: MM44 - LPMM18/155  Respondent: Emma Tallick 10855553  Agent:**

I would like to register my objections to the current planning for additional developments around Send Village.

In particular I would like to object to the developments MM44 and MM41.

As well as impacting on the heritage of the area around Send Marsh Green, MM44 also contradicts the Green Belt policy of MM9. This land has always been listed as green belt land and therefore other non-green belt sites should be considered before developing this green belt land. In addition, the whole area around Send is at full capacity for what the current infrastructure can support, this includes:-

Roads
Schools
Doctors
Dentists

Send Villages Medical Practice is full, takes many days if not weeks to get a Doctor's appointment. Ripley has now lost its local primary school and only has one small dentist practice. The roads around this area are heavily congested at all times and safety is becoming an issue as more and more major accidents are happening on the A3 section parallel to the Send/Ripley area as well as parking being pretty non-existent during peak times. With no local schools being able to take a large influx of new residents, this would result in yet more traffic as new residents would have to drive their children to distant schools outside of the local area.

Therefore, without substantial additional infrastructure to support the above, this area cannot support any more additional housing as shown in MM44 and MM41.

Attached documents:

**Comment: MM27 - LPMM18/841  Respondent: Anna Crawford 10856673  Agent:**

I object to Transport strategies MM27 MM41 MM42 MM48

As the traffic impact on this area with thousands more cars will increase the pollution noise & delays

Attached documents:

**Comment: MM41 - LPMM18/838  Respondent: Anna Crawford 10856673  Agent:**
RE: Policy A43

I object as this large proposed increase in the number of houses is excessive.

The site is subject to flooding & the greater number of cars relating to this, will block the roads schools & medical facilities will be at breaking point. Send & Ripley will be joined up & constitutes over development.

This area is Green Belt with ancient woodland.

Attached documents:

Comment: MM41 - LPMM18/842  Respondent: Anna Crawford 10856673  Agent:

I object to Transport strategies MM27 MM41 MM42 MM48

As the traffic impact on this area with thousands more cars will increase the pollution noise & delays

Attached documents:

Comment: MM42 - LPMM18/840  Respondent: Anna Crawford 10856673  Agent:

I object to Policy A58

There is no need for a new industrial site on this green belt land, Slyfield has unused spaces

The surrounding roads are narrow & nitrogen dioxide levels are already dangerous

Attached documents:

Comment: MM42 - LPMM18/843  Respondent: Anna Crawford 10856673  Agent:

I object to Transport strategies MM27 MM41 MM42 MM48

As the traffic impact on this area with thousands more cars will increase the pollution noise & delays

Attached documents:

Comment: MM44 - LPMM18/839  Respondent: Anna Crawford 10856673  Agent:

I object to Policy A63 as this Green Belt site has no exceptional circumstances & contradicts Policy MM9
An increase of 45% housing in Send is too much for the infrastructure.

**Comment:** MM48 - LPMM18/844  **Respondent:** Anna Crawford 10856673  **Agent:**

I object to Transport strategies MM27 MM41 MM42 MM48

As the traffic impact on this area with thousands more cars will increase the pollution noise & delays

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/1856</th>
<th>Respondent: Dr William Kyte OBE 10857889</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>This modification is unsound as it is based on out of date and unsound data.</td>
<td></td>
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<tr>
<td>The latest ONS population projections for Guildford and the new standard OAN methodology have not been used which render the underlying basis of the plan unsound and mean that the Examination in Public should be reopened.</td>
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<tr>
<td>A report by Neil McDonald shows that 360 homes/year would meet both the need and cater for economic growth.</td>
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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/1605</th>
<th>Respondent: Angela Otterson 10858977</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I am writing to object to: MM41,MM42,MM44,MM9, MM27.</td>
<td></td>
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<tr>
<td>POLICY S2.</td>
<td></td>
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<tr>
<td>At the public examination the figure for Guildford B.C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated.</td>
<td></td>
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<tr>
<td>The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.</td>
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<tr>
<td>The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.</td>
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<tr>
<td>This latest data makes a mockery of G.B.C consultants figures which have always been very suspect.</td>
<td></td>
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<tr>
<td>I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.</td>
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</tbody>
</table>

**Attached documents:**
Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Lane and Send Road will cause horrendous noise, air pollution delays and gridlock.

We are living on Send Barns Lane and trust me it is bad enough now – it is becoming harder and harder to get out of our drive and two of my daughters have developed asthma, just walking along Send Barns Lane during rush hour makes breathing difficult now – what will it be like when you add thousands more cars into the mix?

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.

This is an increase of 37% in the number of houses to be built and I can only assume that the Conservative Guildford Borough Council are punishing Send for throwing out the Conservative Councillors and electing Green Belt Councillors.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking.

This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.
This site is contaminated by many years of Clay Pigeon Shooting and is prone to frequent flooding.

Up to a thousand cars and between 1600 to 1700 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

Why have over 7000 objections to the earlier plan been ignored and more houses etc added?

**Attached documents:**

**Comment: MM42 - LPMM18/1608  Respondent: Angela Otterson 10858977  Agent:**

MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

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**Attached documents:**

**Comment: MM44 - LPMM18/1610  Respondent: Angela Otterson 10858977  Agent:**

MM44 Land at Aldertons Farm, Send Road, Policy A63.

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY.

With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%

How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment.

Agin this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

**Attached documents:**
Comment: MM48 - LPMM18/1609  Respondent: Angela Otterson 10858977  Agent:

MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account ?

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons ,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads.

They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Lane and Send Road will cause horrendous noise, air pollution delays and gridlock.

We are living on Send Barns Lane and trust me it is bad enough now – it is becoming harder and harder to get out of our drive and two of my daughters have developed asthma, just walking along Send Barns Lane during rush hour makes breathing difficult now – what will it be like when you add thousands more cars into the mix?

Attached documents:

Comment: MM9 - LPMM18/1611  Respondent: Angela Otterson 10858977  Agent:

MM9 GREEN BELT POLICY.

How can you say the modifications claim to protect our precious GREEN BELT except in very special circumstances ?

GBC make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE.

This is a catch all statement which is completely subjective causing complete uncertainty and completely negates GREEN BELT PROTECTION.

Virtually any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish the above objections to be considered and this huge imposition of housing and commercial development to be largely abandoned as Send Village is at present at bursting point.

Attached documents:

Comment: MM27 - LPMM18/875  Respondent: Mrs C OWEN-Crane 10859073  Agent:

Changes to the A3 will not address the additional traffic through the villages it will only affect through traffic

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/870</th>
<th>Respondent: Mrs C OWEN-Crane 10859073</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>I object to any additional houses being built and certainly not the increased number. Any number of homes would put a huge strain on our local roads which are already congested at rush hour and significantly at times when there is a problem on the A3 or M25. Our local school in Send is full. Where are the additional children going to go? Our local surgery is running at capacity, where will the additional number of people go for an appointment? Send is surrounded by glorious woodland as part of the green belt, woodland absorbs the pollutants from the A3 and M25.</td>
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<th>Respondent: Mrs C OWEN-Crane 10859073</th>
<th>Agent:</th>
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<tr>
<td>Feeder roads around this area are too narrow to accommodate additional traffic, there is no additional land either side of these narrow country roads to relieve the congestion.</td>
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<td>Attached documents:</td>
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<thead>
<tr>
<th>Comment: MM42 - LPMM18/871</th>
<th>Respondent: Mrs C OWEN-Crane 10859073</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I object to the increase in industrial and storage area. There is already brown field land that is already underused without increasing traffic within a small village setting.</td>
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<td>Attached documents:</td>
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<th>Respondent: Mrs C OWEN-Crane 10859073</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I object to this site being used for 'self build' houses as there would be no control over the appearance of the houses and again there would be additional traffic and strain on our present infrastructure</td>
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<td>Attached documents:</td>
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<th>Respondent: Mrs C OWEN-Crane 10859073</th>
<th>Agent:</th>
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<tr>
<td>I object to the addition of self build houses that will put an additional strain on our already congested infrastructure and resources.</td>
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<td>Attached documents:</td>
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<tr>
<td>Comment</td>
<td>MM48 - LPMM18/877</td>
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<tr>
<td>I'm not sure how the increase of houses, cars and people leads to an environment improvement scheme.</td>
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<tr>
<th>Comment</th>
<th>MM9 - LPMM18/874</th>
<th>Respondent: Mrs C OWEN-Crane 10859073</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I object to the sacrifice of our precious green belt. We were told that development would only happen if there was the necessary infrastructure, this is obviously not the case with these proposals</td>
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<tr>
<th>Comment</th>
<th>MM27 - LPMM18/1280</th>
<th>Respondent: Neil Haxton 10859265</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM27, MM41, MM42, MM48 Transport Strategy</td>
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<td>This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.</td>
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<tr>
<th>Comment</th>
<th>MM41 - LPMM18/1276</th>
<th>Respondent: Neil Haxton 10859265</th>
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<tbody>
<tr>
<td>MM41 Land at Garlicks Arch, Send Marsh, Policy A43</td>
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<tr>
<td>I object to this because;</td>
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<tr>
<td>This will join up the villages of Send and Ripley, causing over development with an excessive 37% increase in houses.</td>
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<tr>
<td>Previous objections to a lesser number have been ignored</td>
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<tr>
<td>The excessive increase in cars will block already busy roads,</td>
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<tr>
<td>The excessive increase in residents will put the infrastructure under pressure, with no school places, as the local school in Ripley has already closed and the GP surgery is under strain</td>
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<tr>
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</table>
MM27, MM41, MM42, MM48 Transport Strategy

This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.

Attached documents:

Comment: MM42 - LPMM18/1277  Respondent: Neil Haxton 10859265  Agent:

MM42 Land at Burnt Common, Policy A58

I object to this because;

It is on Green Belt land and makes unnecessary concentrated increase of industrial development in Send village which is not proposed in any other village.

There is already unused industrial sites at Slyfield, the Employment Land Needs Assessment show there is less need for this type of land, and an increase in Send Business Centre show there is no demand for it.

Increase in traffic will block already busy roads

Attached documents:

Comment: MM42 - LPMM18/1282  Respondent: Neil Haxton 10859265  Agent:

MM27, MM41, MM42, MM48 Transport Strategy

This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.

Attached documents:

Comment: MM44 - LPMM18/1278  Respondent: Neil Haxton 10859265  Agent:

MM44 Land at Alderton’s Farm, Policy A63

I object to this because;

This is Green Belt land and there are heritage centres at Send Marsh Green which will be affected with an increase in traffic blocking already busy surrounding roads including Send crossroads.

Garlicks Arch, Clockbarn and Winds Ridge developments would increase the number of houses by 45% with an already insufficient infrastructure.

Attached documents:
Comment: MM48 - LPMM18/1283  Respondent: Neil Haxton 10859265  Agent:

**MM27, MM41, MM42, MM48 Transport Strategy**

This will not address the excessive increase in cars causing gridlock, extensive delays, noise and nitrous dioxide pollution.

**Attached documents:**

Comment: MM9 - LPMM18/1279  Respondent: Neil Haxton 10859265  Agent:

**MM9 Green Belt Policy**

I object to this because the changes to the Green Belt policy leave it open to more development with it no longer being protected.

**Attached documents:**

Comment: MM3 - LPMM18/5177  Respondent: Annabel Agace 10859361  Agent:

I recently attended a talk by the GVG about the Plan. I was impressed at the quality and diligence of their efforts to assist the Council in creating a truly ‘local plan’. I fear that the Council are not particularly interesting in listing to and leaning from those who live in the local plan area.

I am aware of the revisions that the Council has made in light of your comments. I have long believed that there is a need for a more comprehensive masterplan for the town centre. I do not believe that the hastily penned S3 goes far enough - the area is covers is too small and does not address the very real infrastructure issues our town is facing.

There is also too much future housing development on green belt sites when brownfield opportunities exist.

The public hearings should be re-opened on these subjects to allow re-examination.

**Attached documents:**

Comment: MM51 - LPMM18/3990  Respondent: Barbara Sansom 10859425  Agent:

I wish to protect the rural character of the landscape enjoyed by residents & visitors in the village Of West Horsley Therefore I confirm my approval of this modification.

**Attached documents:**
Comment: MM2 - LPMM18/1917  Respondent: Neil Langridge 10862977  Agent:

I believe the Local Plan examination should be re-opened because the housing figures are no longer up to date. The methodology is outdated, and new research from the Office of National Statistics significantly reduces housing requirement for Guildford. This makes the plan fundamentally flawed, and will cause unnecessary green belt loss as well as a focus on over development.

Attached documents:

Comment: MM35 - LPMM18/1918  Respondent: Neil Langridge 10862977  Agent:

The proposals for the improved infrastructure are completely insufficient. Burpham is already highly congested, and adding southern slip roads will further reduce traffic to halt in what is already a very busy village/suburb. The sustainable movement corridor along London Road is impossible, with no scope to widen the road, and the only option to improve local traffic is the A3 tunnel which this development could threaten (due to building on the point at which it would start). The local sewage infrastructure is already barely capable of current loads, and so further development would create horrendous potential consequences. GBC does not run buses, and indeed local bus services have been reduced, not increased, so the implication of a greater focus on non-car traffic is unrealistic. Previous reports have found development, and a rail station here, to be undesirable in creating a London commuter settlement, and nothing has changed that.

Attached documents:

Comment: MM41 - LPMM18/1102  Respondent: Mr (Mr Alec McIndoe) 10864065  Agent:

There were apparently over 7000 objections to the previous proposal for 400 homes on this site. It appears that the Council has not only disregarded 7000 residents and voters, but have made the proposal even more objectionable by increasing the proposed development by 37.5% ! Nothing has changed since the last proposal: The site is still Green Belt, it still contains ancient woodland, it has still been used for clay pigeon shooting, and the local educational and medical situations have not altered apart from the closure of Ripley School. The proposed development will put an unnecessary strain on the local infrastructure causing increased traffic, danger, and air and noise pollution.

Attached documents:

Comment: MM42 - LPMM18/1103  Respondent: Mr (Mr Alec McIndoe) 10864065  Agent:

This proposal is, and always has been, inappropriate for the area. Send, Send Marsh and Ripley are rural villages each with their own unique aspects. The siting of a massive industrial site at Burnt Common will inevitably change the character of the villages - for the worse. I understand that there is spare capacity at Slyfield Green. Similarly, there are numerous "brown" sites within Surrey which could be used if there is a demand for this kind of development which is questionable. The infrastructure is not, I believe, capable of coping with the stresses which would be put on it, were this proposal to go ahead. The quality of life of the existing residents would be hugely affected by the increase in heavy duty traffic. Also, it seems that the original proposal has been doubled since the original proposal was deleted from the 2014 plan. WHY?

Attached documents:
I object most strongly to this proposal. It has already been deleted from an earlier draft plan because of the numerous objections. It is a Green Belt site, it would go some way to "joining" the two communities of Send and Send Marsh (which is, I believe, not wanted by either community) and, it appears to me that there is very little demand in the area for additional housing. Properties, both new and existing, are not selling, and I see no reason to suppose that 120 new homes coming to the market would change that. Additionally, if 120 new homes were to be built and occupied, Send Marsh Road would become even more congested than it already is, and make the junction with the Portsmouth Road and the Send Crossroads junction chaotic.

Attached documents:

Ref: Guildford Borough Council's Modified Local Plan consultation I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents' Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited 2. There is too much reliance on A3 improvements and these are beyond the council's control 3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit 4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for 'exceptional circumstances'.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:
1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt 2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share The A247 I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road. The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic. I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years' time the traffic will be stop-start heading to the A3 during the morning peak and similarly in
the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic 2. The development of 550 houses at Garlick's Arch (an addition of 150) with the main entrance/exit on the A247 3. The development of 120 houses (new site) at Alderton's Farm, Send Marsh 4. The development of 1800 houses at Gosden Hill 5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247 6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3 7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing 8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. 9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments 10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247 The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are: 1. The junction with the current A3 south-bound slip road (modifications are underway) 2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph 3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council's proposal to build a 1,000 place school on the site behind the station. 4. The sight lines for the exit of the Onslow Arms car park 5. The narrowness of the road near Summers 6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement 7. The sharp bend near Clandon Regis 8. The narrowness of the road at the Bull's Head 9. The Clandon Junior School and the, in places, narrow footpath for children walking to school 10. The sharp bend with poor sight lines in either direction at the church 11. No continuous footpath through the length of the village 12. The speed of traffic 13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the
Green Belt.

E. The Guildford Residents' Association's Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government's standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking's need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

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**Comment: MM23 - LPMM18/3649  Respondent: Edwina Fassom 10865537  Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid "could be anywhere" estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of "green approaches" should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

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**Comment: MM23 - LPMM18/3656  Respondent: Edwina Fassom 10865537  Agent:**

MM23 - POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council's Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/3646  Respondent: Edwina Fassom 10865537  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate

F. The Guildford Vision Group's Objections and Concerns Which I Share
MM3 - POLICY S3 Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 - POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 - POLICY S3. Guildford Borough Council should adopt Guildford Vision Group's proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/3650  Respondent: Edwina Fassom 10865537  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/3651  Respondent: Edwina Fassom 10865537  Agent:

MM32 A height limit for White Lion Walk is required
Comment: MM33 - LPMM18/3652  Respondent: Edwina Fassom 10865537  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Comment: MM35 - LPMM18/3653  Respondent: Edwina Fassom 10865537  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Comment: MM41 - LPMM18/3654  Respondent: Edwina Fassom 10865537  Agent:

MM41 Garlick's Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Comment: MM44 - LPMM18/3655  Respondent: Edwina Fassom 10865537  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Comment: MM9 - LPMM18/3648  Respondent: Edwina Fassom 10865537  Agent:
MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM27 - LPMM18/383 Respondent: Christine Reeves 10866305 Agent:

MM41 - Policy A43
MM42- Policy A58
MM44 -Policy A63
MM9
MM27 MM41 MM42 MM48

I objected to the Land at Garlicks Arch Send Marsh being developed on in my last objection letter so to consider having another 37% development on the site would be outrageous considering 7000 objections were ignored previously for a fewer number of houses being built.

Businesses and employees that have been on the site for many years would loose their jobs as companies have to close or relocate. Their jobs have been their lifeline and income in some cases for their lifetime.

Over the years all the roads locally have been transformed from quiet country lanes to Grand Prix tracks and the lanes and roads infrastructure certainly couldn’t cope with extra housing, cars producing more dangerous nitrogen dioxide putting more people at health risk which they hoped to escape from by moving to the country. We certainly don’t need more people, housing or cars choking our village depleting our woodland areas and picturesque Send March green.

Roads, schools, health centres and hospitals are already overstretched.

Attached documents:

Comment: MM41 - LPMM18/380 Respondent: Christine Reeves 10866305 Agent:

MM41 - Policy A43
MM42- Policy A58
MM44 -Policy A63
MM9
MM27 MM41 MM42 MM48

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Roads, schools, health centres and hospitals are already overstretched.

Attached documents:

Comment: MM42 - LPMM18/381  Respondent: Christine Reeves 10866305  Agent:

MM41 - Policy A43
MM42- Policy A58
MM44 -Policy A63
MM9
MM27 MM41 MM42 MM48

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Roads, schools, health centres and hospitals are already overstretched.

Attached documents:

Comment: MM44 - LPMM18/382  Respondent: Christine Reeves 10866305  Agent:

MM41 - Policy A43
MM42- Policy A58
MM44 -Policy A63
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Roads, schools, health centres and hospitals are already overstretched.

Comment: MM48 - LPMM18/384  Respondent: Christine Reeves 10866305  Agent: MM41 - Policy A43  
MM42- Policy A58  
MM44 -Policy A63  
MM9  
MM27 MM41 MM42 MM48  
I objected to the Land at Garlicks Arch Send Marsh being developed on in my last objection letter so to consider having another 37% development on the site would be outrageous considering 7000 objections were ignored previously for a fewer number of houses being built.

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Roads, schools, health centres and hospitals are already overstretched.

Comment: Other comments - LPMM18/379  Respondent: Christine Reeves 10866305  Agent:
Roll on Brexit !!, controlled immigration, when is the government going to realise we are a small island, far too congested and wake up to reality.

The buy to let market is a farce and should be stopped.

The country should be helping Companies to provide a suitable wage to enable people to save for a house or afford to rent.

What about affordable old people’s homes, for people who have worked all their life had a nice home, and deserve help in old age without being ripped off?

**Attached documents:**

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**Comment:** MM44 - LPMM18/5884  **Respondent:** Andy Court 10866721  **Agent:**

I am strongly objecting to the new site you are proposing at Aldertons Farm, Send Marsh Road Policy A63.

1/This land is Green Belt with no special circumstances, additionally is has a BAT COLONY located nearby.

2/This area is a quiet location and will not with the current infrastructure cope with additional housing, schools, doctors and road network will implode

3/It contradicts Policy MM9

4/It will detract from the heritage buildings in Send Marsh

5/The additional traffic that at least 240 cars will create will put too much pressure on the current traffic situation – already Send Marsh Road queues up to Portsmouth Road during the morning rush

6/With planning for Garlick’s Arch, Clockbarn and Winds Ridge this is an increase of 45% far too much for the current infrastructure and will add at least an additional 1540 cars to our road network.

7/Living in Tuckey Grove I back onto the Alderton Farm Fields and can confirm as noted above that during dusk there are many bats flying around so a bat colony is clearly located close by.

Can you please explain why local councils do not seem to look at current infrastructures, adding so many additional homes to and already crowded village will bring it to a standstill. Why are councils not looking to building new villages which are self-supporting (own doctors surgery, schools and shops) away from existing villages.

These proposals you are putting forward MM41, MM42, MM44, MM9, M27 and MM48 will increase noise, nitrogen dioxide, diesel particulate pollution, delays/gridlock due to thousands of additional cars.

This is such a heavy concentration of additional housing in one village, it will not be able to cope. You will need to create additional road networks, schools, doctors surgery’s and allow more parking at each property as currently most houses have a minimum of 2 cars and only parking for one.

Please do not destroy our village.

**Attached documents:**
Comment: MM2 - LPMM18/3086  Respondent: Mike Pinder 10866881  Agent:

I’m a resident of East Horsley – my address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

I would like to object to the proposed local plan

1. Number of Houses (MM2) - Last month the ONS released new household growth projections for Guildford for the plan period which significantly reduce the expected growth in the number of households from 11,142 to 6,635. This is such a massive decrease in the projected number of houses that I cannot see any situation in which it could be argued that the previous projections should continue to be used. I object to more houses than are needed being built in this area. I am particularly incredulous that, even though GBC and the Inspector, Jonathan Bore, were both aware of the likely significant reduction in population projections, (as projections were released in May 2018 showing this), they continued with the housing numbers in the local plan and instead of reducing it, the Inspector chose to increase the number of houses required to take on Woking’s unmet need.

2. Re-opening the public examination (MM2) – due to the massive differences between the plan and the latest ONS data, the only course of action can be to re-open the public examination by the Planning Inspector, to take these changes into account and significantly reduce the number of houses in the GBC local plan.

Attached documents:

Comment: MM9 - LPMM18/3087  Respondent: Mike Pinder 10866881  Agent:

1. Policy P2: Green Belt (MM9) – Although this policy has been changed significantly, this section has not factored in the massive reduction in the number of projected houses from the latest data released by the ONS. More than half of the plan’s housing is due to be built on land that is currently in the Green Belt – this is now no longer necessary due to the reduction in housing number requirements. There can be no justification to build such a large number of houses on the Green Belt and choosing to ignore the new housing figures, with the consequence that land that is currently in the Green Belt will be built on and therefore lost for future generations, is frankly, criminal.

I would like the Local Plan public examination to be re-opened so that the new ONS housing data can be factored into the housing calculations so that only the houses that are required are built and no Green Belt land is built on unnecessarily.

Attached documents:

Comment: MM2 - LPMM18/4127  Respondent: Kristine Good 10866945  Agent:

Send is facing a total transformation over the next few years. It will be the end of the village as we know it today – four new housing developments, two traveller sites, a huge industrial/warehouse complex, an enlarged business centre, building on perimeter fields, two new A3 slip roads and an incalculable increase in traffic congestion. Clearly this is too much development for one village.

Attached documents:

Comment: MM27 - LPMM18/4131  Respondent: Kristine Good 10866945  Agent:
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock, as already stated in previous points. This area is unable to support increased residential traffic and is unsuitable for heavy commercial traffic.

In conclusion, development of this scale in this rural village will be detrimental to the character of this living space, and impact hugely on residents, there is insufficient consideration of the enormous size of development being placed in one small area of the constituency, as opposed to spacing out development, which would ease traffic overloading, decrease the escalating problem of pollution, share the increased strain on services; education, health.

I urge the planners to take these objections in to consideration and listen to the observations regarding these plans from the people who live and work in these areas and see each day how the infrastructure is completely inappropriate to support such huge development in squeezed into one small area of the borough.

Attached documents:

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**Comment:** MM41 - LPMM18/4132  **Respondent:** Kristine Good 10866945  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

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**Comment:** MM42 - LPMM18/4128  **Respondent:** Kristine Good 10866945  **Agent:**

MM42 Land at Burnt Common, London Road, Send, Policy A58

Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

Since being deleted from the 2014 plan this has been increased twice, doubling the area despite objections to its inclusion originally.
It is by far the largest new industrial allocation in any village in the borough.

**There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity.**

There are no special circumstances so it also contradicts MM9. The Employment Land Needs Assessment showed a reduction in demand for industrial land.

This is in addition to the 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.

The road though Send to Woking is narrow, residential with tight bends towards Old Woking. This road has seen several serious accidents, and is gridlocked regularly from Broadmeads through Send towards Burnt Common several times a month with current usage.

Nitrogen dioxide levels are already dangerous in what is a highly residential area, recent press coverage implied that maintaining air quality for its constituents was very important to Surrey County Council and local councils. *Guildford Borough Council Air Quality Strategy – 2017 v10/Surrey County Council Air Quality Strategy (2016)*

**Attached documents:**

---

**Comment:** MM42 - LPMM18/4133  **Respondent:** Kristine Good 10866945  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

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**Attached documents:**

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**Comment:** MM44 - LPMM18/4129  **Respondent:** Kristine Good 10866945  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

New site for 120 Homes including some self build

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
It is a Green Belt site with no special circumstances so it also contradicts policy MM9

It will detract from the heritage buildings at Send Marsh Green

The additional traffic will increase pressure on the Send Crossroads.

With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure. It will change the character of the villages of Send, Send Marsh and Ripley irrevocably.

Comment: MM8 - LPMM18/4134  
Respondent: Kristine Good 10866945  
Agent: MM27 MM41 MM42 and MM48 Transport Strategy

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock, as already stated in previous points. This area is unable to support increased residential traffic and is unsuitable for heavy commercial traffic.

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I urge the planners to take these objections in to consideration and listen to the observations regarding these plans from the people who live and work in these areas and see each day how the infrastructure is completely inappropriate to support such huge development in squeezed into one small area of the borough.

Attached documents:

Comment: MM9 - LPMM18/4130  
Respondent: Kristine Good 10866945  
Agent: MM9 Green Belt Policy

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents. This is not rigorous enough to protect the very precious Green Belt encircling the village boundary.

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<td>• An increase of 37% in the number of houses proposed is excessive</td>
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<td>• 7000 objections to the previous lower number have been ignored</td>
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<td>• It is Green Belt containing ancient woodland</td>
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<td>• It will join up Send and Ripley and constitute over development</td>
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<td>• The site is subject to frequent flooding and contaminated by lead shot</td>
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<td>• At least 800 extra cars will block up the adjacent roads</td>
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• There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
• The Employment Land Needs Assessment showed a reduction in demand for industrial land
• This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Attached documents:

Comment: MM42 - LPMM18/1537 Respondent: Steve Loosley 10867105  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM44 - LPMM18/1533 Respondent: Steve Loosley 10867105  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
• It is a Green Belt site with no special circumstances so it also contradicts policy MM9
• It will detract from the heritage buildings at Send Marsh Green
• The additional traffic will increase pressure on the Send Crossroads
• With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/1538 Respondent: Steve Loosley 10867105  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:
MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

why must we have such a huge increase in the original number of houses? This greenbelt area is a well known area for frequent flooding and huge influx of house owners will only put more strain on already over populated area....a fact that was Stressed in the previous objection which appears to have been ignored.

Attached documents:

this is a huge increase industrial allocation for a village of this size well it must be almost twice the size of the previous application. The adjacent A3 has only one way access to the area and used As a diversion which means surrounding roads will be gridlocked even more than they are now. Nitrogen dioxide levels are already dangerously high.

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this motion contradicts policy MM9. Again adding 45% more houses to the 1700 currently in Send is too much for infrastructure. The surrounding roads will be gridlocked especially on the Send crossroad.

**Attached documents:**

**Comment:** MM9 - LPMM18/1916  **Respondent:** mr David Govey 10867873  **Agent:**

although the modifications claim to protect the greenbelt except in very special circumstances GBC make an exception for limited in filling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village. This introduces a subjective test, Considerable uncertainty and effectively negates green belt protection. Any land on the edge of our village could be picked off for development, and open invitation to developers and speculators at the expense of residence.

**Attached documents:**

**Comment:** MM45 - LPMM18/5599  **Respondent:** Nicola Ford 10868161  **Agent:**

I am writing to object to MM45, dealing with Policy A64.

This site is Green Belt land and previous applications to build on it have been rejected. No new exceptional circumstances have been put forward to make this proposal any different.

If the proposal did go ahead, it would merge Flexford and Normandy together, without providing any new amenities to contribute to the village community.

There are Brown field sites in Guildford town centre which would be more suitable to build houses on, which have so far been overlooked in the Local Plan.

Please register my strong objection to Policy A64.

**Attached documents:**

**Comment:** MM27 - LPMM18/2296  **Respondent:** Ron and Charmian Leach 10868193  **Agent:**

MM27 MM41 MM48

The transport in Send Barns Lane and Send Road is now very bad at peak times. Cars standing in traffic increases air pollution, noise, gridlock and frustration getting to work every day. The school and medical centre are in the middle of this chaos.

**Attached documents:**
Opening new entry/exit slip roads off the A3 will overload Send Village, Send Barns Lane and Send Road with unacceptable levels of vehicular traffic, a lot of it HGV. The road network is unsuitable for this level of traffic and will give rise to unacceptable levels of pollution of all types. I therefore OBJECT.

Attached documents:

7000 objections to the previous proposals were ignored. Green Belt, glorious woodland, rare bird life etc to be destroyed. The proposed increase of 37% houses is excessive - school & medical centre would not cope.

Attached documents:

The proposed increase in industrial and storage is not warranted. The narrow roads are getting gridlocked. Send already has the biggest concentration of industrial buildings than any other village and no proven need.

Attached documents:

The proposed increase of 45% in housing is just too much for the infrastructure especially at the Send Crossroads. Again a Green Belt site!

Attached documents:

MM27, MM41, MM42 and MM48 Transport Strategy

Comment: MM41 - LPMM18/2297  Respondent: Ron and Charmian Leach 10868193  Agent:

Comment: MM41 - LPMM18/2301  Respondent: Ron and Charmian Leach 10868193  Agent:

Comment: MM42 - LPMM18/2300  Respondent: Ron and Charmian Leach 10868193  Agent:

Comment: MM44 - LPMM18/2299  Respondent: Ron and Charmian Leach 10868193  Agent:

Comment: MM48 - LPMM18/2298  Respondent: Ron and Charmian Leach 10868193  Agent:
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Attached documents:

Comment: MM9 - LPMM18/2295  Respondent: Ron and Charmian Leach 10868193  Agent:

Re: Send Planning Policy

As residents in Send since 1970 we are devastated at the continuing proposals for our beautiful village. Although we realise new developments are necessary there is plenty of land available without concentrating on Send Village & immediate surroundings. The following are of great concern.

MM9 Green Belt Policy

You are not honouring our Green Belt areas which makes Green Belt just a farce & meaningless. Developers etc are just waiting to cover them beautiful areas.

Attached documents:

Comment: Other comments - LPMM18/2302  Respondent: Ron and Charmian Leach 10868193  Agent:

Other Developments

Travellers Sites Send Hill.

This was a site (unlawful) some years ago & caused [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] property developed & peoples lives badly effected. There is plenty of land elsewhere for proper well managed sites.

PLEASE LOOK AGAIN AT ALL OUR CONCERNS AS A VILLAGE AND FIND MORE SUITABLE AREAS AND SOLUTIONS.

Attached documents:

Comment: MM2 - LPMM18/2716  Respondent: Robert Lockie 10868609  Agent:

The recently revised ONS statistics show a huge over 40% reduction in housing need for Guildford Borough as well as a huge reduction for housing needs in Guildford's neighbouring boroughs. Therefore the figures for Guildford need to be reviewed.

These figures would mean that GBC should not have to pick up any of Woking's shortfall.
If Woking’s shortfall is because they want to maintain their greenbelt, why should Guildford have to build on its greenbelt to meet Woking's need?

**Attached documents:**

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**Comment:** MM41 - LPMM18/2713  **Respondent:** Robert Lockie 10868609  **Agent:**

I object to the new proposals to the GBC local plan.

MM41 Garlicks Arch

1 An increase of a third in the number of houses proposed is excessive
2 7000 objections to previous lower number ignored
3 Local infrastructure strained to breaking point
4 Create gridlock on local roads, already at that point frequently
5 Further building on Green Belt
6 Unique nature of Send and Ripley as villages will be ruined

**Attached documents:**

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**Comment:** MM42 - LPMM18/2714  **Respondent:** Robert Lockie 10868609  **Agent:**

MM42 Burnt Common

1 Since deleted from the 2014 plan this has been increased doubling the area
2 It is by far the largest industrial allocation in any village in the borough
3 No need to put industrial sites in Green Belt when Slyfield has unused capacity. There are no special circumstances so it contradicts MM9
4 The Employment Land Needs Assessment showed a reduction in demand for industrial land
5 This on top of a 25% increase at Send Business Centre making a much bigger concentration in Send than any other village with no proven demand
6 Narrow local lanes and roads will be gridlocked

**Attached documents:**

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**Comment:** MM44 - LPMM18/2715  **Respondent:** Robert Lockie 10868609  **Agent:**
MM44 Aldertons Farm

1. This was deleted from earlier draft plan because of all the objections, not re-inserted until the public examination in July.

2. Again Green Belt site with no special circumstances so it also contradicts policy MM9.

3. It will detract from the heritage buildings on Send Marsh green.

4. Additional traffic will increase pressure at Send crossroads.

5. With Garlicks Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 new houses to the 1700 currently in Send an increase of 45% much too much for our infrastructure.

Attached documents:

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**Comment:** MM27 - LPMM18/573  **Respondent:** Richard Vickery 10869345  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

This area suffers from very high traffic throughout the week. The surrounding villages, Ripley, Clandon, Ockham and Old Woking, are overwhelmed at times. This plan will increase the problem and make it intolerable to get anywhere by bringing more traffic through the villages, especially Send, to get on and off the A3 at Burnt Common.

Attached documents:

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**Comment:** MM41 - LPMM18/570  **Respondent:** Richard Vickery 10869345  **Agent:**

I write yet again as a resident of Send to object strongly to the overall plan regarding Send. Particularly that the development proposal is predominately on greenbelt land, which should not be considered. The infrastructure in this village - roads, school and healthcare - can scarcely cope at times with the number of people and cars. To increase all of these problems by building an excessive number of new houses is inexplicable to say the least.

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

This area is in the green belt, with ancient woodland, and is subject to flooding. The number of proposed homes will mean that the school and medical surgery, which are already under immense pressure, will be overwhelmed.

Attached documents:

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**Comment:** MM41 - LPMM18/574  **Respondent:** Richard Vickery 10869345  **Agent:**

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**Attached documents:**

**Comment:** MM42 - LPMM18/571  **Respondent:** Richard Vickery 10869345  **Agent:** 

**MM42** Land at Burnt Common, London Road, Send Policy A58

There is no need for and industrial site in Send at all, let alone in a green belt area, as the Slyfield site is not full and money spent there would remove the necessity for this type of development.

**Attached documents:**

**Comment:** MM42 - LPMM18/575  **Respondent:** Richard Vickery 10869345  **Agent:** 

**MM27 MM41 MM42 and MM48** Transport Strategy

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**Attached documents:**

**Comment:** MM48 - LPMM18/576  **Respondent:** Richard Vickery 10869345  **Agent:** 

**MM27 MM41 MM42 and MM48** Transport Strategy

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**Attached documents:**

**Comment:** MM9 - LPMM18/572  **Respondent:** Richard Vickery 10869345  **Agent:** 

**MM9** Green Belt Policy

This green belt land, which is precious to us as residents, should be unobtainable to speculative developments.
**Comment: MM27 - LPMM18/561  Respondent: Rosalyn Vickery 10870305  Agent:**

Traffic implications for the Send, Burnt Common, Ripley area are not improved by the proposed alterations to the A3 and Clandon access. Access to the A3 may be improved but the surrounding roads will be severely impacted by the number of additional cars coming from the huge number of new homes. During rush hour there are already long queues on Send Barns Lane, Send Road and adjoining roads - some of which are single lane. Send school has totally inadequate parking now for parents to drop off children and with both parents working there is no time to walk.

The whole area will be affected by the number of additional vehicles and the local roads are not suitable now for the current volume of traffic.

**Comment: MM41 - LPMM18/566  Respondent: Rosalyn Vickery 10870305  Agent:**

This land is green belt. It is prone to flooding. The number of cars cannot be accommodated on the existing congested roads. The school and medical centre are already oversubscribed and don't have space for expansion. The number of extra cars used to drop children off at the school will cause total chaos as there is already insufficient space for the existing numbers. there is no suitable public transport and parents have no time to walk to school when both work. The number of houses has been increased when even the previous lower number was considered excessive.

**Comment: MM42 - LPMM18/568  Respondent: Rosalyn Vickery 10870305  Agent:**

There is no necessity for an additional industrial site in Send. Space is still available at Slyfield and this is green belt land.

**Comment: MM44 - LPMM18/569  Respondent: Rosalyn Vickery 10870305  Agent:**

This is green belt land and no special circumstances apply. The local roads are unable to cope with existing traffic and the number of extra cars would cause gridlock. There is no public transport available. The infrastructure cannot cope with the number of additional people proposed for the area.
Comment: MM9 - LPMM18/560  Respondent: Rosalyn Vickery 10870305  Agent:

'Limited infilling outside the indentified settlement boundaries' is so vague as to remove existing protection for the green belt. It should not be considered unless ALL other options have been tried, and it should only be done in conjunction with the local (parish) planners.

Attached documents:

Comment: MM27 - LPMM18/2598  Respondent: Lynn Durbridge 10871169  Agent:

My First objections are to : MM41,MM42,MM44,MM9, MM27.

At the public examination the figure for Guildford Borough Council housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. (This is illegal, by law you have to show how you have arrived at such figures. ... To this end Police involvement may be necessary as fraud may have taken place.)

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspicious.

My expectation is that the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

Table S2b: Spatial Strategy: Distribution of Housing 2015 – 2034 (net number of homes) states that the net number of homes within villages is 154, this contradicts other figures and is obviously a lie?

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

And 2000 new homes at Wisley airfield is totally unacceptable. Not only will Send and Ripley be joined but the whole of Guildford...the whole of surrey will be connected in one sprawling mass of houses and industrial parks with barely a patch of green as far as the eye can see. Individual communities will no longer have their own identities and roads will be even more congested. Services have only received lip service, Gps and schools (and parking) that are already at bursting point have not been thought about at all.

MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account ?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill, Wisley and Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. It seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.
This massive increase in traffic and associated air pollution will affect pupils of Send 1st school which will take brunt of the increased pollution as will St Beads middle school. The dropping off of children at Send 1st school is already absolute mayhem and it is only a question of time before a fatality happens. With an increase of traffic the chances of a fatality goes up exponentially

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**MM41 Land at Garlicks Arch,Send Marsh,Policy A43.**

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.

This is an increase of 37% in the number of houses to be built and I can only assume that the Conservative Guildford Borough Council are punishing Send for throwing out the Conservative Councillors and electing Green Belt Councillors.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the objections have died down and nobody is checking.

This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

This site is contaminated by lead from many years of Clay Pigeon Shooting and is prone to frequent flooding.

Up to a thousand cars and between 1600 to 1700 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

Our local Health Centre is already oversubscribed and struggling to work in overwhelming conditions.

There is no money to build any extension or employ more health staff. Again the local infrastructure will be totally overwhelmed.

You already have over 7000 objections to the earlier plans but these objections have been totally ignored and more houses etc added?

**Attached documents:**

**Comment:** MM42 - LPMM18/2601  **Respondent:** Lynn Durbridge 10871169  **Agent:**

**My First objections are to : MM41,MM42,MM44,MM9, MM27.**

At the public examination the figure for Guildford Borough Council housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. (This is illegal, by law you have to show how you have arrived at such figures. ... To this end Police involvement may be necessary as fraud may have taken place.)

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My expectation is that the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.
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**MM42. Land at Burnt Common, London road Send Policy A58.**

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land why has again Send been picked on again to have the largest industrial allocation in any village in the Borough, is it politics?

This is a further increase of 25% making it a huge increase in Send, bigger than any other village.

There is no need for new industrial sites when Slyfield is has unused capacity There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.

There is no need to put Industrial premises in our precious GREEN BELT, except if as a Council Cabinet you want to punish Send.

This plan has since being deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.

**Attached documents:**

**Comment:** MM44 - LPMM18/2602

**Respondent:** Lynn Durbridge 10871169  **Agent:**

**My First objections are to:** MM41, MM42, MM44, MM9, MM27.
At the public examination the figure for Guildford Borough Council housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. (This is illegal, by law you have to show how you have arrived at such figures. To this end Police involvement may be necessary as fraud may have taken place.)

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**MM44 Land at Aldertons Farm, Send Road, Policy A63.**

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY.

With Garlics Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%

How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment.

Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

**Attached documents:**

**Comment:** MM48 - LPMM18/2603  **Respondent:** Lynn Durbridge 10871169  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy.**

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?
The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill, Wisley and Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. It seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

This massive increase in traffic and associated air pollution will affect pupils of Send 1st school which will take brunt of the increased pollution as will St Beads middle school. The dropping off of children at Send 1st school is already absolute mayhem and it is only a question of time before a fatality happens. With an increase of traffic the chances of a fatality goes up exponentially.

Attached documents:

Comment: MM9 - LPMM18/2600 Respondent: Lynn Durbridge 10871169 Agent:

My First objections are to: MM41, MM42, MM44, MM9, MM27.

At the public examination the figure for Guildford Borough Council housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. (This is illegal, by law you have to show how you have arrived at such figures. ... To this end Police involvement may be necessary as fraud may have taken place.)

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspicious.

My expectation is that the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

table S2b: Spatial Strategy: Distribution of Housing 2015 – 2034 (net number of homes) states that the net number of homes within villages is 154, this contradicts other figures and is obviously a lie?

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

And 2000 new homes at Wisley airfield is totally unacceptable. Not only will Send and Ripley be joined but the whole of Guildford...the whole of surrey will be connected in one sprawling mass of houses and industrial parks with barely a patch of green as far as the eye can see. Individual communities will no longer have their own identities and roads will be even more congested. Services have only received lip service, Gps and schools (and parking) that are already at bursting point have not been thought about at all.

MM9 Green Belt Policy.

How can you say the modifications claim to protect our precious GREEN BELT except in very special circumstances?
GBC make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE.

This is a catch all statement which is completely subjective causing complete uncertainty and completely negates GREEN BELT PROTECTION.

Virtually any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish all the above objections to be considered and this huge imposition of housing and commercial development that is simply not needed for it to be largely abandoned as Send Village is presently at bursting point.

It is so obvious to all and sundry this is not being done to government requirements but for private gains!

It is obvious that financial gain motivates the reasoning behind the proposed plans, when non green belt areas are available (but not as profitable from a sales point of view) that this is not being done to government requirements.

If real housing need is the only motivation then the proposed sites need to be explained fully and transparently.

All the previous letters and objections should still be taken into account at this time.

Attached documents:

**Comment:** MM2 - LPMM18/3387  **Respondent:** Rob Stevens 10873313  **Agent:**

Before I begin I have to question whether you should be looking for sites for new homes when you have one and it’s yet to be developed.

The Vision engineering site was agreed to have a new building on the basis the old one was removed and houses built on the site. There appears to be absolutely no progress on that and GBC should be held to account for not protecting the village and ensuring developments are held to their agreements. Why look to have sites for new houses when you have the site and allowed development based upon the building of houses and you font even pursue it.

As to my objections on the developments now raised:

My initial objection is to: MM41,MM42,MM44,MM9, MM27.

**POLICY S2.**

The housing number predictions have been shown to be incorrect so this is all starting from a incorrect basis. The latest data makes a mockery of G.B.C consultants figures.

At the public examination the figure for Guildford.B.C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated.

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.
I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

Attached documents:

Comment: MM27 - LPMM18/3388  Respondent: Rob Stevens 10873313  Agent:

MM27. MM41. MM42.and MM48 Transport Strategy

The effect of thousands more cars has not appear to have been properly taken into account? The A3 junction wont fix the issue of masses of traffic along A roads to Woking.

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons ,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM41 - LPMM18/3389  Respondent: Rob Stevens 10873313  Agent:

MM27. MM41. MM42.and MM48 Transport Strategy

The effect of thousands more cars has not appear to have been properly taken into account? The A3 junction wont fix the issue of masses of traffic along A roads to Woking.

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons ,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM41 - LPMM18/3394  Respondent: Rob Stevens 10873313  Agent:

MM41 Land at Garlicks Arch,Send Marsh.Policy A43.
I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years, an increase of 37% in the number of houses to be built and I can only assume that the Conservative Guildford Borough Council are punishing Send for throwing out the Conservative Councillors and electing Green Belt Councillors.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking.

This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

This site is contaminated by many years of Clay Pigeon Shooting and is prone to frequent flooding.

Up to a thousand cars and between 1600 to 1700 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

Why have over 7000 objections to the earlier plan not just been ignored but more houses etc added?

Attached documents:

**Comment:** MM42 - LPMM18/3390  **Respondent:** Rob Stevens 10873313  **Agent:**

MM27. MM41. MM42.and MM48 Transport Strategy

The effect of thousands more cars has not appear to have been properly taken into account? The A3 junction wont fix the issue of masses of traffic along A roads to Woking.

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

**Comment:** MM42 - LPMM18/3395  **Respondent:** Rob Stevens 10873313  **Agent:**

MM42. Land at Burnt Common,London road Send Policy A58.

There is no need for new industrial sites when Slyfield is has unused capacity There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.

There is no need to put Industrial premises in our precious GREEN BELT, except if as a Council Cabinet you want to punish Send.

This plan has since being deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.
You don't seem to think of the greenbelt being protected and available for future generations - you just want to take advantage and use it now.

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land why has again Send been picked on again to have the largest industrial allocation in any village in the Borough, is it politics?

This is a further increase of 25% making it a huge increase in Send, bigger than any other village.

Attached documents:

Comment: MM44 - LPMM18/3396  Respondent: Rob Stevens 10873313  Agent:

MM44 Land at Aldertons Farm, Send Road, Policy A63.

Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY.

With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%.

How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment.

Attached documents:

Comment: MM48 - LPMM18/3391  Respondent: Rob Stevens 10873313  Agent:

MM27. MM41. MM42. and MM48 Transport Strategy

The effect of thousands more cars has not appear to have been properly taken into account? The A3 junction won’t fix the issue of masses of traffic along A roads to Woking.

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three grandchildren who live on Send Barns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM9 - LPMM18/3397  Respondent: Rob Stevens 10873313  Agent:
MM9 GREEN BELT POLICY.

The modifications claim to protect our precious GREEN BELT except in very special circumstances, clearly that is not true.

GBC make an exception for "LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE."

This is vague and benefits only those who wish to ignore the protection. Its a catch all statement which is completely subjective causing complete uncertainty and completely negates protecting the Green belt and simply means that any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish the above objections to be considered and this huge imposition of housing and commercial development to be largely abandoned as Send Village is at present at bursting point.

Attached documents:

Comment: MM2 - LPMM18/5274  Respondent: Monika Brewer 10873633  Agent:

I object - on the following grounds:

There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release

I have not been advised of the consultation

The examination in public should be reopened so that the latest Office of National Statistics can be used

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM14 - LPMM18/5922  Respondent: Margaret Pearce 10874273  Agent:

MM14 the transport strategy relies too much on the A3 which is already over crowded.

Attached documents:

Comment: MM2 - LPMM18/5919  Respondent: Margaret Pearce 10874273  Agent:

I am writing to OBJECT to the following main modifications.
MM2 the hearing should be reopened so that the latest ONS figures and household figures can be taken into account. MM2 There should be no requirement to take in Woking’s unmet need.

Attached documents:

Comment: MM23 - LPMM18/5924  Respondent: Margaret Pearce 10874273  Agent:

I also OBJECT to MM23, for all the reasons stated by the Council. Paragraph 7 should be deleted from the local plan.

Attached documents:

Comment: MM3 - LPMM18/5920  Respondent: Margaret Pearce 10874273  Agent:

MM3 there is too much allocation in the town centre. All recent evidence shows that on-line shopping and business taxes are having a serious effect on shopping in the town’s centres. The many empty shops on our town centre would indicate this.

Attached documents:

Comment: MM40 - LPMM18/5921  Respondent: Margaret Pearce 10874273  Agent:

Site specific A35. Three Farm Meadows. The addition of land to the South of the appeal site does not mitigate as much of the new land is constrained by the VOR (air traffic control beacon).

Attached documents:

Comment: MM40 - LPMM18/5923  Respondent: Margaret Pearce 10874273  Agent:

MM47 the biodiversity of the SNCI will be destroyed plus an appropriate Assessment and a Habitats Regulation Assessment have not been completed—— in breach of case law.

Attached documents:

Comment: MM9 - LPMM18/5929  Respondent: Margaret Pearce 10874273  Agent:

Also I believe that the proposed insetting of East Horsley from the Green Belt (policy MM9, policy P2). Is unsound and should be removed from the list of proposed inset villages. Thank you for reading my objections.
I strongly support all the comments made by East Horsley Parish Council on the proposed modifications to the plan.

Attached documents:

**Comment:** MM2 - LPMM18/3460  **Respondent:** Valerie Austin 10875969  **Agent:**

I object to the infilling of local villages, the impact on wildlife, pollution levels, crowding of car parks at Stations and our high streets.

I call for the examination in public to be reopened so that the latest Office of National Statistics can be used.

Attached documents:

**Comment:** MM40 - LPMM18/3457  **Respondent:** Valerie Austin 10875969  **Agent:**

I wish to register my objection to the plans for the former Wisley Airfield, that were rejected by the Secretary of State in the summer.

Attached documents:

**Comment:** MM41 - LPMM18/3458  **Respondent:** Valerie Austin 10875969  **Agent:**

I object strongly to the certain impact of traffic on the A3 and local lanes.

Attached documents:

**Comment:** MM9 - LPMM18/3461  **Respondent:** Valerie Austin 10875969  **Agent:**

I object to the use of Green Belt land for such a development.

I support the representation by WAG which was written with the advice of Richard Harwood QC.

Attached documents:

**Comment:** MM27 - LPMM18/5101  **Respondent:** Margaret Powell 10876609  **Agent:**
I wish to object to ALL the above Main Modifications 9, 27, 41, 42 & 48

Our village is big enough already - the roads get very congested & Send Primary School would not be big enough to take all the extra children especially as Ripley School is closing! It is getting increasingly difficult to get teachers - so are our children going to get any decent education

I have lived the village most of my life & over the last ten years there are now fewer places to walk & get out into the countryside! The Green Belt land & woodlands are becoming non existent.

Why build more Industrial Units - in the past they have been left empty & some now turned into living space - so why do we need more!!! Places are being vacated weekly & left into disrepair - so definitely don't need anymore!

The houses that have recently been built in the village & surrounding areas have not sold - so how are they going to sell a few hundred more! You are DESTROYING village life & going to pollute the countryside! Therefore a lot more health problems without sufficient Medical facilities available - what a NIGHTMARE!

I Strongly object to ALL the above Modifications. - so please re think your policies.

Attached documents:

Comment: MM41 - LPMM18/5102  Respondent: Margaret Powell 10876609  Agent:

I wish to object to ALL the above Main Modifications 9, 27, 41, 42 & 48

Our village is big enough already - the roads get very congested & Send Primary School would not be big enough to take all the extra children especially as Ripley School is closing! It is getting increasingly difficult to get teachers - so are our children going to get any decent education

I have lived the village most of my life & over the last ten years there are now fewer places to walk & get out into the countryside! The Green Belt land & woodlands are becoming non existent.

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The houses that have recently been built in the village & surrounding areas have not sold - so how are they going to sell a few hundred more! You are DESTROYING village life & going to pollute the countryside! Therefore a lot more health problems without sufficient Medical facilities available - what a NIGHTMARE!

I Strongly object to ALL the above Modifications. - so please re think your policies.

Attached documents:

Comment: MM42 - LPMM18/5103  Respondent: Margaret Powell 10876609  Agent:

I wish to object to ALL the above Main Modifications 9, 27, 41, 42 & 48

Our village is big enough already - the roads get very congested & Send Primary School would not be big enough to take
all the extra children especially as Ripley School is closing! It is getting increasingly difficult to get teachers - so are our children going to get any decent education?

I have lived the village most of my life & over the last ten years there are now fewer places to walk & get out into the countryside! The Green Belt land & woodlands are becoming non-existent.

Why build more Industrial Units - in the past they have been left empty & some now turned into living space - so why do we need more!!! Places are being vacated weekly & left into disrepair- so definitely don't need anymore!

The houses that have recently been built in the village & surrounding areas have not sold - so how are they going to sell a few hundred more! You are DESTROYING village life & going to pollute the countryside! Therefore a lot more health problems without sufficient Medical facilities available - what a NIGHTMARE!

I Strongly object to ALL the above Modifications. - so please re think your policies.

Attached documents:

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Comment: MM48 - LPMM18/5104  Respondent: Margaret Powell 10876609  Agent:

I wish to object to ALL the above Main Modifications 9, 27, 41, 42 & 48

Our village is big enough already - the roads get very congested & Send Primary School would not be big enough to take all the extra children especially as Ripley School is closing! It is getting increasingly difficult to get teachers - so are our children going to get any decent education?

I have lived the village most of my life & over the last ten years there are now fewer places to walk & get out into the countryside! The Green Belt land & woodlands are becoming non-existent.

Why build more Industrial Units - in the past they have been left empty & some now turned into living space - so why do we need more!!! Places are being vacated weekly & left into disrepair- so definitely don't need anymore!

The houses that have recently been built in the village & surrounding areas have not sold - so how are they going to sell a few hundred more! You are DESTROYING village life & going to pollute the countryside! Therefore a lot more health problems without sufficient Medical facilities available - what a NIGHTMARE!

I Strongly object to ALL the above Modifications. - so please re think your policies.

Attached documents:

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Comment: MM2 - LPMM18/1570  Respondent: Michael Hurdle 10876993  Agent:

MM2 - Spatial Development Strategy and Housing Numbers

I OBJECT -

The housing number is too high. It is essential that that plan is evidence-based, and the September 2018 ONS should be taken seriously – this would indicate a target in the low 300s per annum.

Attached documents:
MM2 - Spatial Development Strategy and Housing Numbers

I OBJECT -

The housing number is too high. It is essential that that plan is evidence-based, and the September 2018 ONS should be taken seriously – this would indicate a target in the low 300s per annum.

Attached documents:

MM23 D1 para 13 - 17 Masterplan

I OBJECT -

This is far too much developer led, and would push GBC into compliance with plans which had no status or approval.

Attached documents:

MM3 - Delivery of Development and Regeneration within Guildford Town Centre

I SUPPORT –

This is a welcome chance to replace falling retail demand with residential building.

Attached documents:

MM41 - Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley. POLICY A43

I OBJECT -

Will impact Send more that Ripley or Clandon, as residents will have to use Send Primary School and the Villages Medical Centre based in Send. Many will use Send shops. Apart from the Medical Centre, there is no space for expansions of these facilities.

On its own, new Garlick’s Arch proposals increase homes in Send by a further 8.8% in addition to the 23% of the previous plan. Together with other new additions, total impact in Send would have 16% more homes than in the previous plan, and the Burnt Common industrial area as well.
Previous concerns about traffic on Burnt Common Roundabout are further increased – roundabout already beyond capacity at busy times and there is no space to improve infrastructure. Objections to traffic issues are routinely brushed aside; traffic impacts on quality of life and air pollution. Current traffic monitoring methodology tends to average out and hide the peaks. There is too much reliance on A3 improvements which GBC cannot direct.

This would effectively join up Send and Ripley – the kind of ‘urban sprawl’ the Green Belt legislation is meant to prevent.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/1568</th>
<th>Respondent: Michael Hurdle 10876993</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM42 – Land around Burnt Common Warehouse, London Road, Send POLICY A 58</td>
<td>I OBJECT -</td>
<td></td>
</tr>
<tr>
<td>This would introduce substantial burden of heavy goods vehicles to area, starting with Burnt Common Roundabout, already beyond capacity at busy times and with no space to improve infrastructure.</td>
<td>Traffic will go through unsuitable choked road through Send, Old Woking and through Clandon – narrow roads with no opportunities for infrastructure improvement. There is too much reliance on A3 improvements which GBC cannot direct.</td>
<td>The ELNA shows reduced demand for industrial land, and there is already unused capacity at Slyfield.</td>
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<tr>
<td>Heavy vehicles will cause air pollutions – there is already increased nitrogen dioxide levels at points along the A247 (determined by EarthSense <a href="http://www.bbc.co.uk/news/science-environment-42566393">http://www.bbc.co.uk/news/science-environment-42566393</a>)</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM44 - LPMM18/1569</th>
<th>Respondent: Michael Hurdle 10876993</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>MM44 – Land WEST OF Aldertons Farm, Sendmarsh Road, Send POLICY A63</td>
<td>I OBJECT -</td>
<td></td>
</tr>
<tr>
<td>Will add significant traffic burden to overstretched road – both exits at Mays Corner A247 and at the B2215 are stretched already</td>
<td>On its own, adds 7% to homes in village. Together with other new additions, total impact in Send would have 16%more homes than in previous plan, and the Burnt Common industrial area as well.</td>
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<th>Respondent: Michael Hurdle 10876993</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM7 - Rural Exception Homes</td>
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</tbody>
</table>
I OBJECT -

Whilst I fully support affordable housing in principle, this should be in areas allocated by the local plan. The Rural exception Scheme would mean no effective limit on building, even in badly overstretched areas.

Attached documents:

Comment: MM41 - LPMM18/5910  Respondent: Phil Beddoes 10878529  Agent:

MM 41

Could I ask again that you clarify and give examples of what 'otherwise adverse material impacts....' Means?

Attached documents:

Comment: MM42 - LPMM18/5908  Respondent: Phil Beddoes 10878529  Agent:

The recently published ONS figures significantly revise downwards the predicted housing noted in GBC. This revision must be reflected in the Local Plan. The failure to do so would likely result in a judicial review and a significant delay in the plans approval. The reduction predicted by the ONS provides an opportunity to remove one or more of the numerous sites in Send

MM42

The unclear and uncertain minimum floor space of this development puts a Blight on the area. It also means that there will be difficulties matching highway needs to traffic flows and routes. Much of the wording is unclear and ambiguous....what does 'otherwise adverse material impacts....' actually mean?

I am writing with real concern for the Send community and village. It does appear to many in the village that the disproportionate amount of both housing and commercial development in our community is as a result of politicians directing officers to load it on a non Conservative area. I am not of that view. I think each development in our village has been considered separately by officers using all appropriate technical tools and guidance.....but then no due regard to the overall impact on Send has been undertaken or commented upon. I fear that officers and politicians have put in place plans which will see a village devastated by over development resulting in the urbanisation of what is a lovely Surrey village. It will also be a village of unaffordable affordable homes which will not meet our housing need especially for our young people.

This is a sad time for us all in Send

I fear like the many thousand comments made previously on this matter that the words above will be read and forgotten within seconds. I guess that is what today's local government is about.

Yours with a sad heart

Attached documents:
The site will fill a gap between Send Marsh and Send which will invariably result in eventual merging of these settlements. The site has not been open to public scrutiny as have others at the Hearing. The site takes more green belt from the village without reason other than you need early build. Is that an exceptional reason for building on fields?

Attached documents:

I offer below my comments on the set of main modifications to the amended GBC Local Plan:

1. NUMBER OF HOUSES (MM2)

The current version of the Plan has increased the number of houses from 12,426 to 12,600. However, the ONS recently released the projected household growth figures which shows a 40.5% reduction to 6635 households or 4,507 less. This equates to, for example, the dwellings proposed at Wisley airfield (site A35, MM40) of 2,000 and Gosden Hill Farm (site A25, MM35) of 1,800 plus a further 707 at any of the various other targeted sites.

Consequently the increase seems totally unwarranted.

2. RE-OPENING THE PUBLIC EXAMINATION (MM2)

Due to the very large differences between the Plan and the current ONS household data, the Public examination of the Plan by the Planning Inspector must be re-opened.

4. POLICY P2- GREEN BELT (MM2)

This Policy has been redrafted, but takes absolutely no account of the large reduction in projected households referred to in 1.above.

66% of the proposed housing is planned to be built on land that currently lies within the Green Belt.

Thus it is completely unwarranted to consider that the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances to justify any development in the Green Belt exist; they do not.

Attached documents:

3. NEW POLICY S3 FOR THE TOWN CENTRE (MM3)

Policy S3 is verbose, very general, imprecise and lacking precision. It fails to clearly describe what is planned, whereabouts it is planned or when it is proposed action should be taken.

This draft is therefore inadequate.

Attached documents:
5. POLICY A35-FORMER WISLEY AIRFIELD (MM40)

On June 13, 2018, the Secretary of State published his decision to uphold the Council's decision to refuse permission for the Wisley Airfield planning application (15/P/00012), and the applicant's planning appeal was dismissed.

3 months later the Local Plan (including Policy A35, essentially the same scale as that rejected by the Secretary of State) was submitted for the present public consultation.

This seems very strange when the official household projections on which the Plan was based had been reduced by 40% (see 1 above).

The SNCI has been reduced to some 20% of its former size and about one third of the residual area is "safeguarded" for waste operations. Never less the Plan curiously states that "every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures". This sounds contradictory.

Attached documents:

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Comment: MM51 - LPMM18/2048 Respondent: Jess Kimpton 10880225 Agent:

Re: Guildford Local Plan - Strategy & Sites - Main Modifications 2018 Sept 2018

MM51 Amendment 1: Horsleys - West Horsley (South) - map page 84

We strongly approve this amendment, which moves a previously proposed unsound and indefensible boundary - being a basic post & rail fence - and therefore not a valid argument to bring greenbelt land into village settlement boundary.

We can see no merit including this high value prime agricultural land into the village boundary. Possible development will be vigorously opposed, costly and be of little value to an affordable housing vision.

The new proposed modification now runs in a straight line along the back of Silkmore Lane and will protect and preserve the highly valued rural character of West Horsley South as it faces beautiful open countryside toward the National Trust's Hatchland Park.

The tranquility and beauty of this unspoilt side of the village adjacent to the conservation area with its 42 listed buildings, is highly valued not only by village and local residents, but also by visitors to the area, particularly specified by Olympic and frequent cycling events, should be preserved at all costs.

Attached documents:

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Comment: MM27 - LPMM18/3385 Respondent: James Anderson 10880481 Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine
words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more
cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses
and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send
Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy
concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM41 - LPMM18/3381  Respondent: James Anderson 10880481  Agent:

MM41 Land at Garlick’s Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the
first five years

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
- It is Green Belt containing ancient woodland
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

Comment: MM42 - LPMM18/3382  Respondent: James Anderson 10880481  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of
industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no
  special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any
  other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Attached documents:

Comment: MM42 - LPMM18/3392  Respondent: James Anderson 10880481  Agent:
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM44 - LPMM18/3383  Respondent: James Anderson 10880481  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/3393  Respondent: James Anderson 10880481  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:
Comment: MM9 - LPMM18/3384  Respondent: James Anderson 10880481  Agent:

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM2 - LPMM18/4562  Respondent: Chris Cotton 10880705  Agent:

• It appears that the council is not conforming to its own development hierarchy under which all potential uses of brownfield sites should be explored.
• I understand that the housing numbers used in the plan are not based on the most recent data from the ONS. Although forecasts are always subject to error it is nonetheless crucial to use the most up to date figures available. If this means that public hearings must be restarted then so be it, it is far better than making plans based on outdated forecasts.

Attached documents:

Comment: MM3 - LPMM18/4564  Respondent: Chris Cotton 10880705  Agent:

• Policy S3 for the regeneration of the town centre can be improved once the two points above have been addressed.

Attached documents:

Comment: MM41 - LPMM18/4563  Respondent: Chris Cotton 10880705  Agent:

• Parts of the plan are contingent on improvements to the A3, but this is not under the council's control.

Attached documents:

Comment: MM6 - LPMM18/4566  Respondent: Chris Cotton 10880705  Agent:

• Section MM6, paragraph 4a now states that "the Council will consider the following ..." whereas the previous wording was "the Council may consider the following ...". This significantly weakens the Council's position
when trying to ensure that developers provide the required amount of affordable housing. This should be changed back to "may".

Attached documents:

Comment: MM27 - LPMM18/546  Respondent: Roger Knee 10880993  Agent:

Traffic Implications

MM27, MM41, MM42 and MM44.

The effect of greatly increased traffic on Send Barns Lane and Send Road is not fully understated by GBC. It seems there's a feeling that "it will be alright on the night". Well it won't be so until GBC commit to a proper study of the matter which will be made public and up to debate.

Attached documents:

Comment: MM41 - LPMM18/542  Respondent: Roger Knee 10880993  Agent:

GBC Local Plan

I require the following objections to be duly noted.

MM41

1. If this area is developed, Send, Sendmarsh and Ripley will become one and it will be a case of over-development.

2. It is Green Belt Land.

3. There has been an increase from 400 to 550 homes. Why is this? This will mean an entire 900 or more cars leading to local roads being blocked.

4. Local Facilities (not just roads) will be [unreadable text]. For example, when will local GP services be provided to cope?

5. The large numbers of objections, to the entire proposal have been ignored. [unreadable text]?

6. The mature woodland must not be destroyed.

Attached documents:

Comment: MM41 - LPMM18/547  Respondent: Roger Knee 10880993  Agent:

Traffic Implications
MM27, MM41, MM42 and MM44.

The effect of greatly increased traffic on Send Barns Lane and Send Road is not fully understated by GBC. It seems there's a feeling that "it will be alright on the night". Well it won't be so until GBC commit to a proper study of the matter which will be made public and up to debate.

Attached documents:

Comment: MM42 - LPMM18/543  Respondent: Roger Knee 10880993  Agent:

MM42

1. The increase to a minimum of 14,800sq.m has not been justified.

2. Why is unused land at Slyfield (not Green Belt) not been considered?

3. This development is not a proper use of Green Belt land as there are *special circumstances* - see MM9.

4. As with MM41, local roads are totally inadequate to meet the increase in [unreadable text]. What [unreadable text] are there to [unreadable text]

Attached documents:

Comment: MM42 - LPMM18/548  Respondent: Roger Knee 10880993  Agent:

Traffic Implications

MM27, MM41, MM42 and MM44.

The effect of greatly increased traffic on Send Barns Lane and Send Road is not fully understated by GBC. It seems there's a feeling that "it will be alright on the night". Well it won't be so until GBC commit to a proper study of the matter which will be made public and up to debate.

Attached documents:

Comment: MM44 - LPMM18/544  Respondent: Roger Knee 10880993  Agent:

MM44

1. What are the "special circumstances" requiring this development. It falls [unreadable text] with policy to safeguard the Green Belt - see MM9.

2. These [unreadable text], together with [unreadable text], added 770 to the 1700 in Send at present. There is an increase of no less than 45%. The local infrastructure will be totally flooded.
3. This was deleted from an earlier draft because of the weight of objection. Why has it reappeared?

Attached documents:

Comment: MM44 - LPMM18/549  Respondent: Roger Knee 10880993  Agent:

Traffic Implications

MM27, MM41, MM42 and MM44.

The effect of greatly increased traffic on Send Barns Lane and Send Road is not fully understated by GBC. It seems there's a feeling that "it will be alright on the night". Well it won't be so until GBC commit to a proper study of the matter which will be made public and up to debate.

Attached documents:

Comment: MM9 - LPMM18/545  Respondent: Roger Knee 10880993  Agent:

MM9

It appears to me that protection of Green Belt Land is neglected by the policy in the proposals at MM42 and MM44 and probably at MM41. GBC is supposed to have a [unreadable text] not just for now but for the future.

Attached documents:

Comment: MM41 - LPMM18/5702  Respondent: Ben Stevens 10881217  Agent:

Re: Guildford Local Plan: Strategy and Sites – Main Modifications 2018

I repeat my concern that the objections of local residents have not been listened to and I feel that the village of Send has been disproportionately targeted for excessive building development.

I object to MM41 - Policy A43 at Garlick’s Arch to build a huge estate of 550 homes. This is an outrageous number of new homes for our village to absorb all once and would cause disastrous over-development altering the character of our village for ever. It will become a sprawling suburb of Guildford - joining up Ripley and Send and eroding our beautiful greenbelt land. This will also increase the already bad traffic congestion and will block up the surrounding roads. As well as this, it is another area in Send that is subject to frequent flooding and is currently a flood zone 2 allocation. Removing it from greenbelt would completely destroy the beautiful ancient woodland dating back to the time of Elizabeth 1st.

Attached documents:

Comment: MM42 - LPMM18/5703  Respondent: Ben Stevens 10881217  Agent:
I object to MM42 - Policy A58 at Burnt Common. This is the largest new industrial allocation in any village in the borough. It makes no sense that an industrial development is required when there are empty sites and industrial units at Slyfield and in Guildford. In addition, it contradicts MM9 as it is a Greenbelt site because as far as I am aware, there are no special circumstances.

Attached documents:

Comment: MM44 - LPMM18/5704  Respondent: Ben Stevens 10881217  Agent:

I object to MM44 - Policy A63 because an extra site for 120 homes on top of the 550 in Garlick’s Arch, the 60 in Clockbarn and the 40 in Winds Ridge will add 770 homes to Send which is an increase of 45%. This is far too many to be acceptable and will have a massive impact on all our surrounding roads increasing congestion as well as pollution. Such a heavy concentration in one village is unreasonable and the building should be spread more evenly throughout Surrey.

Attached documents:

Comment: MM2 - LPMM18/3283  Respondent: Christine Brockbank 10881921  Agent:

Firstly, may I say that I am confused as to why the public examination figure for Guildford Borough Housing need is fixed at 789 per year, when the correct figure should be 431 per year.

To be seen as a transparent and open council, supporting the residents of the Borough, it is necessary to use correct and substantiated facts.

Unfortunately, the council action over the housing needs and plans has only demonstrated a lack of consideration or honesty by council members, and will result in a lack of confidence by the public at large.

7000 people having already written to voice concerns about the proposed development, the council now proposes increasing the original development plans, yet will not allow any concerns about the original plan - only the additional plans. Could someone please explain how this is democratic or acceptable?

Attached documents:

Comment: MM41 - LPMM18/3284  Respondent: Christine Brockbank 10881921  Agent:

MM41: Land at Garlicks Arch

I object to this increase of 37% on the initial 400 proposal.

you received over 7000 objections to the original proposal of 400 - yet up have chosen to ignore 7000 objections and now increased the number to 550.

This constitutes blatant over-development, not just of houses and households, but cars and the requirements for medical and educational services.
<table>
<thead>
<tr>
<th>Comment: MM42</th>
<th>LPMM18/3286</th>
<th><strong>Respondent:</strong> Christine Brockbank 10881921</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>MM42: land at Burnt Common</strong></td>
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<tr>
<td>An increase FROM 7000 TO over double the size at 14,800 sq. metres of industrial and storage facilities.</td>
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<tr>
<td>I object to this increase. It was deleted from the 2014 plan- but is now doubled in size.</td>
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<td>As there is a reduction in demand for industrial land (Land Needs Assessment) it appears to be perverse and suspect to propose such a large and unnecessary development.</td>
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<tr>
<th>Comment: MM44</th>
<th>LPMM18/3287</th>
<th><strong>Respondent:</strong> Christine Brockbank 10881921</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>MM44 land at Alderton's Farm</strong></td>
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<tr>
<td>New site for 120 homes</td>
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<td>This was deleted from an earlier draft because of objections, yet is included in current plans.</td>
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<td>I object to this proposal on grounds of over-population and increase in infra-structure requirements.</td>
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<table>
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<tr>
<th>Comment: MM48</th>
<th>LPMM18/3296</th>
<th><strong>Respondent:</strong> Christine Brockbank 10881921</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>MM48 Transport Strategy.</strong></td>
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<td>I object to the fact that a real assessment of the traffic requirements have not been considered. The implications for the current residents are horrendous. Air, pollution, traffic noise, grid lock and delays will be the order of the day for residents of Send. Walking children to school in such polluted air will be out of the question, and lead to ever more cars on the road.</td>
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<tr>
<td>There has already been considerable development of sites such as the Tannery on Tannery Lane, and it is proposed 60 houses on the Clockbarn site. This has already had adverse effects on residents in the area in terms of increased traffic, but is of nothing compared to the effects of this outrageous over development that the council is foisting upon us against our will.</td>
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<td>It is very disappointing to feel that the council members do not consider the opinions of the current residents and that they treat us with such contempt.</td>
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**Attached documents:**
Comment: MM9 - LPMM18/3294  Respondent: Christine Brockbank 10881921  Agent: 

MM9 Green Belt Policy

It is up to councils and residents to protect the countries green belts- not eradicate them as the Guildford Borough Council seems intent on doing.

Attached documents:

Comment: MM41 - LPMM18/5953  Respondent: Amanda Stevens 10882113  Agent: 

Re: Guildford Local Plan: Strategy and Sites Main Modifications 2018

I object to MM41 at Garlicks Arch, Send, Policy A43. I think an additional 550 homes is far too many to build in this area and will completely change the character of the surrounding villages. There are likely to be around 800 to 900 more cars on the surrounding roads as most adults have a car each, not one car per family. I would also bring to your attention again that neighbours who have lived there for some time have assured me that the land is contaminated by lead shot accumulated over 50 years which is not suitable for family housing. In addition to all of this, as well as more erosion of our beautiful greenbelt land and joining up the villages of Ripley and Send, it will generate huge traffic congestion that will block up the surrounding roads even more so than is the case at the moment further increasing the levels of nitrogen dioxide.

Attached documents:

Comment: MM42 - LPMM18/5954  Respondent: Amanda Stevens 10882113  Agent: 

I object to MM42 at Burnt Common - Policy A58. It seems to have been re-instated and the area has been doubled making it the largest new industrial allocation anywhere in Surrey. This despite Slyfield and Guildford having empty sites and the Employment Land Needs Assessment which showed a reduction in demand for industrial land. Again, the repercussions of all that extra traffic will cause complete gridlock in the mornings. These roads are usually heavily congested and Nitrogen dioxide levels are already at dangerous levels

Attached documents:

Comment: MM44 - LPMM18/5955  Respondent: Amanda Stevens 10882113  Agent: 

I object to Policy A63, MM44 regarding the land at Alderton’s Farm, Send Marsh Road. It is a green belt site with no special circumstances and so it contradicts policy MM9. With Garlick’s Arch, Clockbarn and Winds Ridge, 770 houses will be added to the 1700 currently in Send which is an increase of 45%. This is too much for our infrastructure and in my view Surrey’s housing need should be spread more evenly throughout the villages in Surrey.

Attached documents:
Comment: MM2 - LPMM18/5025  Respondent: Anita Marshall 10883905  Agent:

I am writing to support WAAG's representation and objections by their legal adviser Mr. Richard Harwood Q.C.

The housing targets are incorrect and there are no exceptional circumstances to justify in any way development within the Green Belt. Development should be concentrated and permitted on brownfield sites within urban boundaries.

Attached documents:

Comment: MM2 - LPMM18/2872  Respondent: Dave Fassom 10884993  Agent:

Ref: Guildford Borough Council's Modified Local Plan consultation I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents' Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited. 2. There is too much reliance on A3 improvements and these are beyond the council's control. 3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit. 4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for 'exceptional circumstances'.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share The A247 I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road. The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years' time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.
What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic 2. The development of 550 houses at Garlick's Arch (an addition of 150) with the main entrance/exit on the A247 3. The development of 120 houses (new site) at Alderton's Farm, Send Marsh 4. The development of 1800 houses at Gosden Hill 5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247 6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3 7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing 8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. 9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments 10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247 The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway) 2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph 3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council's proposal to build a 1,000 place school on the site behind the station.
2. The sight lines for the exit of the Onslow Arms car park 5. The narrowness of the road near Summers 6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement 7. The sharp bend near Clandon Regis 8. The narrowness of the road at the Bull's Head 9. The Clandon Junior School and the, in places, narrow footpath for children walking to school 10. The sharp bend with poor sight lines in either direction at the church 11. No continuous footpath through the length of the village 12. The speed of traffic 13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents' Association's Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government's standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking's need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2875  Respondent: Dave Fassom 10884993  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid "could be anywhere" estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of "green approaches" should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/2883  Respondent: Dave Fassom 10884993  Agent:
MM23 - POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council's Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

Comment: MM3 - LPMM18/2873  **Respondent:** Dave Fassom 10884993  **Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

Comment: MM3 - LPMM18/2882  **Respondent:** Dave Fassom 10884993  **Agent:**

1. The Guildford Vision Group's Objections and Concerns Which I Share

MM3 - POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 - POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 - POLICY S3. Guildford Borough Council should adopt Guildford Vision Group's proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

Comment: MM31 - LPMM18/2876  **Respondent:** Dave Fassom 10884993  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

**Attached documents:**
MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2877  Respondent: Dave Fassom 10884993  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2878  Respondent: Dave Fassom 10884993  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2879  Respondent: Dave Fassom 10884993  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2880  Respondent: Dave Fassom 10884993  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2881  Respondent: Dave Fassom 10884993  Agent:
MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2874  Respondent: Dave Fassom 10884993  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM27 - LPMM18/3459  Respondent: Jim Browne 10893921  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM41 - LPMM18/3444  Respondent: Jim Browne 10893921  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
- It is Green Belt containing ancient woodland
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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Attached documents:

---

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand

Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Attached documents:

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Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

**Comment:** MM44 - LPMM18/3452  **Respondent:** Jim Browne 10893921  **Agent:**

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

**Comment:** MM48 - LPMM18/3469  **Respondent:** Jim Browne 10893921  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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Attached documents:

**Comment:** MM9 - LPMM18/3456  **Respondent:** Jim Browne 10893921  **Agent:**

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively
negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM27 - LPMM18/1659  Respondent: Kerstin Browne Kaempf 10896929  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/1655  Respondent: Kerstin Browne Kaempf 10896929  Agent:

I am writing to object to the local plan Main Modifications as outlined below:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years – this has been objected before

• An increase of 37% in the number of houses proposed is excessive
• 7000 objections to the previous lower number have been ignored
• It is Green Belt containing ancient woodland
• It will join up Send and Ripley and constitute over development
• The site is subject to frequent flooding and contaminated by lead shot
• At least 800 extra cars will block up the adjacent roads and getting to work will become impossible – Guildford and Woking are both very congested already
• School and medical facilities will be strained to breaking point – Ripley primary school was closed, there is no natural secondary school for this area

Attached documents:

Comment: MM41 - LPMM18/1660  Respondent: Kerstin Browne Kaempf 10896929  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.
Comment: MM42 - LPMM18/1656  Respondent: Kerstin Browne Kaempf 10896929  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Comment: MM42 - LPMM18/1661  Respondent: Kerstin Browne Kaempf 10896929  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Comment: MM44 - LPMM18/1657  Respondent: Kerstin Browne Kaempf 10896929  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July!
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.
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<th>E.M. Ellery 10897313</th>
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<td>As most of Normandy is ribbon development a housing estate of this magnitude does not fit!! Which I thought, planning is all about, plus its Green Belt with no special circumstances, except a very high water table, between five and fifteen houses propped in here and there go unnoticed, that way you retain village status, site A64 is some distance away from village school, surgery, shops, village hall, so out comes the car. So no wonder the government target for global warming are unachievable, with so many houses built far away from amenities. And how does wildlife stand with all this nibbling of the countryside, not very well!!</td>
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MM27, MM41, MM42 and MM48 Transport Strategy

The proposed changes in the A3 and Clandon slip roads do not adequately address the impact of thousands more cars travelling along the Portsmouth Road. Send Barns Lane and Send Road past a school and through residential areas, with resulting noise, delays and gridlock and more severe pollution. The infrequent bus services in the area will do nothing to reduce the amount of car use.

Attached documents:

Comment: MM27 - LPMM18/2095  Respondent: A Aldridge 10897633  Agent:

Guildford Local Plan: Strategy and Sites - Main Modifications 2018

I object to the main modifications 2018 to the Guildford Local Plan as follows:-

MM41 - Land at Garlicks Arch, Send Marsh, Policy A43

This is Green Belt Land containing ancient woodland.

The increase in the number of houses proposed, from 400 to 550, will join Send and Ripley and constitutes overdevelopment.

The resulting increase in road traffic will cause further congestion and pollution in adjacent roads, adversely affecting residents and the local school. The A3 and M25 are frequently blocked now, this additional traffic will bring the whole area to a standstill more frequently. School and medical services are already over-subscribed, the waiting time for an appointment at the surgery in Send Barns Lane is already far too long.

Attached documents:

Comment: MM41 - LPMM18/2083  Respondent: A Aldridge 10897633  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The proposed changes in the A3 and Clandon slip roads do not adequately address the impact of thousands more cars travelling along the Portsmouth Road. Send Barns Lane and Send Road past a school and through residential areas, with resulting noise, delays and gridlock and more severe pollution. The infrequent bus services in the area will do nothing to reduce the amount of car use.

Attached documents:
Comment: MM42 - LPMM18/2085  Respondent: A Aldridge 10897633  Agent:

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

This is the largest new industrial proposal in any village in the borough and the additional traffic created will further gridlock the narrow surrounding roads and increase the already dangerous pollution levels.

The Employment Land Needs Assessment shows a reduction in demand for industrial land and as Slyfield has unused capacity there is no justification for taking Green Belt Land.

**Attached documents:**

Comment: MM42 - LPMM18/2097  Respondent: A Aldridge 10897633  Agent:

**MM27, MM41, MM42 and MM48 Transport Strategy**

The proposed changes in the A3 and Clandon slip roads do not adequately address the impact of thousands more cars travelling along the Portsmouth Road. Send Barns Lane and Send Road past a school and through residential areas, with resulting noise, delays and gridlock and more severe pollution. The infrequent bus services in the area will do nothing to reduce the amount of car use.

**Attached documents:**

Comment: MM44 - LPMM18/2090  Respondent: A Aldridge 10897633  Agent:

**Land at Alderton's Farm, Send Marsh Road, Policy A63**

This land was only re-inserted in July after being deleted from an earlier draft.

It is Green Belt land with no special circumstances and contradicts Policy MM9.

It will detract from the heritage buildings at Send Marsh Green.

The additional traffic will cause even more pressure on Send Crossroads and the A247, and on local facilities.

As noted in the Strategic Flood Risk Assessment, Appendix D, Volume 3, there is a risk of flooding in this area of Send Marsh.

This site slopes down to Send Marsh Road and, following periods of heavy rain, water runs down the site to lie at the boundary of the road and causes flooding in the land to the north of Send Marsh Road. The gardens of the houses opposite and downhill from this site also flood during periods of heavy rain. Building houses and roads on the land to the east of Alderton's Farm will cause a more rapid run-off of water towards Send Marsh Road and, consequently, heavier and more rapid, serious flooding of all land and properties in the vicinity.

Send Marsh, by nature of its name, was and is, a marsh and liable to flooding.

**Attached documents:**
Comment: MM48 - LPMM18/2098  Respondent: A Aldridge 10897633  Agent:

**MM27, MM41, MM42 and MM48 Transport Strategy**

The proposed changes in the A3 and Clandon slip roads do not adequately address the impact of thousands more cars travelling along the Portsmouth Road. Send Barns Lane and Send Road past a school and through residential areas, with resulting noise, delays and gridlock and more severe pollution. The infrequent bus services in the area will do nothing to reduce the amount of car use.

In general these proposals place a heavy load on Send and, in the light of recent reports that the Guildford area does not require such a high level of development as originally thought, are unreasonable and unjustified.

**Attached documents:**

Comment: MM9 - LPMM18/2092  Respondent: A Aldridge 10897633  Agent:

**MM9 Green Belt Policy**

These modifications do not appear to uphold protection of the Green Belt and render the village of Send liable to further infilling and development.

**Attached documents:**

Comment: MM27 - LPMM18/4684  Respondent: Sue French 10897665  Agent:

Objection to MM27, MM41, MM42 NS MM48 TRANSPORT STRATEGY Can this really be called a transport strategy? This strategy will clog up all the roads around Send and Ripley, the A3 and the A247 to Woking. These roads are already loaded to capacity and almost at saturation point several times a day.

GBC have received thousands of objections to their plans. Is no one listening?

**Attached documents:**

Comment: MM41 - LPMM18/4681  Respondent: Sue French 10897665  Agent:

Objection to MM41 Land at Garlicks Arch

The proposed 550 homes are excessive on the proposed site. They will join up the villages of Ripley and Send, the extra cars will block the adjacent roads, the local schools and medical facilities will be unable to cope with the resulting influx of people and the Council seem to have chosen a site liable to frequent flooding and contaminated by lead shot. Would GBC Councillors want to live here?

Objection to MM27, MM41, MM42 NS MM48 TRANSPORT STRATEGY Can this really be called a transport strategy? This strategy will clog up all the roads around Send and Ripley, the A3 and the A247 to Woking. These roads are already loaded to capacity and almost at saturation point several times a day.
GBC have received thousands of objections to their plans. Is no one listening?

Attached documents:

**Comment:** MM42 - LPMM18/4682  **Respondent:** Sue French 10897665  **Agent:**

Objection to MM42 Land at Burnt Common

There is no proven need for an industrial site of this size and especially not on Green Belt land. The resulting traffic will result in the villages of Ripley and Send being inundated by big lorries emitting dangerous nitrogen dioxide levels. Is this what the Councillors want for their voters?

Objection to MM27, MM41, MM42 NS MM48 TRANSPORT STRATEGY Can this really be called a transport strategy? This strategy will clog up all the roads around Send and Ripley, the A3 and the A247 to Woking. These roads are already loaded to capacity and almost at saturation point several times a day.

GBC have received thousands of objections to their plans. Is no one listening?

Attached documents:

**Comment:** MM44 - LPMM18/4683  **Respondent:** Sue French 10897665  **Agent:**

Objection to MM44 Land at Alderton’s Farm Again this is Green Belt land and the additional traffic at Send Marsh will clog up the road and spill over to Send Crossroads. Send Marsh is a pretty area which will be destroyed by such a big development.

Attached documents:

**Comment:** MM48 - LPMM18/4686  **Respondent:** Sue French 10897665  **Agent:**

Objection to MM27, MM41, MM42 NS MM48 TRANSPORT STRATEGY Can this really be called a transport strategy? This strategy will clog up all the roads around Send and Ripley, the A3 and the A247 to Woking. These roads are already loaded to capacity and almost at saturation point several times a day.

GBC have received thousands of objections to their plans. Is no one listening?

Attached documents:

**Comment:** MM2 - LPMM18/5727  **Respondent:** Michael Mills 10900385  **Agent:**

MM41-Policy A43---MM42-Policy A58---MM44 Policy A63
I strongly object to the above planning proposals, especially now as the Office of National Statistics confirm that this is far more developments than what is required.

The existing infrastructure will not be able to support the above developments. The roads are already gridlocked, insufficient hospitals, schools, doctor surgeries, transport and the list of these items just keep on growing.

Perhaps it is now time to consider new towns in other parts of the UK as this area of the South East is already at breaking point.

Attached documents:
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Perhaps it is now time to consider new towns in other parts of the UK as this area of the South East is already at breaking point.

Attached documents:

**Comment:** MM42 - LPMM18/5725  **Respondent:** Michael Mills 10900385  **Agent:**

MM41-Policy A43---MM42-Policy A58---MM44 Policy A63

MM9 Green Belt Policy

MM27-MM41-MM42-MM48 Transport Strategy

**Other Developments**

I strongly object to the above planning proposals, especially now as the Office of National Statistics confirm that this is far more developments than what is required.

The existing infrastructure will not be able to support the above developments. The roads are already gridlocked, insufficient hospitals, schools, doctor surgeries, transport and the list of these items just keep on growing.

Perhaps it is now time to consider new towns in other parts of the UK as this area of the South East is already at breaking point.

Attached documents:

**Comment:** MM44 - LPMM18/5726  **Respondent:** Michael Mills 10900385  **Agent:**

MM41-Policy A43---MM42-Policy A58---MM44 Policy A63

MM9 Green Belt Policy

MM27-MM41-MM42-MM48 Transport Strategy

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The existing infrastructure will not be able to support the above developments. The roads are already gridlocked, insufficient hospitals, schools, doctor surgeries, transport and the list of these items just keep on growing.
Perhaps it is now time to consider new towns in other parts of the UK as this area of the South East is already at breaking point.

Attached documents:

Comment: MM48 - LPMM18/5729  Respondent: Michael Mills 10900385   Agent:

MM41-Policy A43---MM42-Policy A58---MM44 Policy A63
MM9 Green Belt Policy
MM27-MM41-MM42-MM48 Transport Strategy

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I strongly object to the above planning proposals, especially now as the Office of National Statistics confirm that this is far more developments than what is required.

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Perhaps it is now time to consider new towns in other parts of the UK as this area of the South East is already at breaking point.

Attached documents:

Comment: MM41 - LPMM18/2210  Respondent: Derek and Lilian Scholes 10902113   Agent:

Local Plan Modifications MM44, MM41, MM42, MM9

We strongly object to the main modifications to the Local Plan for Send. This area is not suitable for such development. There is not the infrastructure to support this, and the real need is for just a small number of AFFORDABLE houses. With regard to MM9, the Green Belt Policy, Alderton's Farm in particular cannot be "considered to be within the village" and such intrusion into the Green Belt will benefit no one but the developers.

Attached documents:

Comment: MM42 - LPMM18/2211  Respondent: Derek and Lilian Scholes 10902113   Agent:

Local Plan Modifications MM44, MM41, MM42, MM9

We strongly object to the main modifications to the Local Plan for Send. This area is not suitable for such development. There is not the infrastructure to support this, and the real need is for just a small number of AFFORDABLE houses. With regard to MM9, the Green Belt Policy, Alderton's Farm in particular cannot be "considered to be within the village" and such intrusion into the Green Belt will benefit no one but the developers.
**Comment:** MM44 - LPMM18/2209  **Respondent:** Derek and Lilian Scholes 10902113  **Agent:**

Local Plan Modifications MM44, MM41, MM42, MM9

We strongly object to the main modifications to the Local Plan for Send. This area is not suitable for such development. There is not the infrastructure to support this, and the real need is for just a small number of AFFORDABLE houses. With regard to MM9, the Green Belt Policy, Alderton's Farm in particular cannot be "considered to be within the village" and such intrusion into the Green Belt will benefit no one but the developers.

**Attached documents:**

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**Comment:** MM9 - LPMM18/2212  **Respondent:** Derek and Lilian Scholes 10902113  **Agent:**

Local Plan Modifications MM44, MM41, MM42, MM9

We strongly object to the main modifications to the Local Plan for Send. This area is not suitable for such development. There is not the infrastructure to support this, and the real need is for just a small number of AFFORDABLE houses. With regard to MM9, the Green Belt Policy, Alderton's Farm in particular cannot be "considered to be within the village" and such intrusion into the Green Belt will benefit no one but the developers.

**Attached documents:**

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**Comment:** MM27 - LPMM18/3000  **Respondent:** M Stokes 10903265  **Agent:**

MM27 MM41 MM42 & MM48 Transport Strategy

The traffic implication for our village with all the new proposed development is untenable. GBC has not been clear in their assessment of the impact of the movement of the thousands of extra cars travelling along congested roads, the pollution levels, delays and gridlocks that will ensue. Even with the proposed A3 changes this still does not address the issues that will arise.

It would seem that GBC has decided that Send and Ripley are to be the fall guys in their planning due to our proximity to two major routes. I ask the Planning Inspector to please see some sense and consider the views of our communities. I personally have no problem with developments that reflect the need within our village but not this huge proposed over development in our area.

**Attached documents:**

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**Comment:** MM41 - LPMM18/2996  **Respondent:** M Stokes 10903265  **Agent:**

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I cannot object strongly enough to the proposed development increase which has been added in the revised plan. I am also staggered by the way in which the GBC and the Planning Inspector have completely ignored the local residents objections and instead have increased the development within the Send and Ripley boundaries.

You are planning to put in four new housing developments totaling 770 houses this is a 45% increase some of which on Green Belt land. A huge industrial site (lord knows why, you can’t fill the empty warehouses in Guildford now!) Two Travellers sites and a new access onto the A3 slip road.

Why are you not listening to us!! The infrastructure cannot cope now let alone with the increase, which has been proposed. It can take three weeks to get an appointment to see your own doctor, the schools are over subscribed. One of which has been closed.

I object to: MM41 Land at Garlick's Arch, Send Marsh, Policy A43

1. Suddenly you have increased the housing number from 450 to 550, why?
2. This land is on Green Belt containing ancient woodland.
3. It will join up Send and Ripley and will constitute over development.
4. The increase in the traffic trying to access Woking, West Clandon or the M25, will become untenable. The local roads are not built for this large increase in vehicles.
5. The roads around the area are narrow lanes and often only room for one vehicle at a time and the nitrogen dioxide levels are already high in our area.

MM27 MM41 MM42 & MM48 Transport Strategy

The traffic implication for our village with all the new proposed development is untenable. GBC has not been clear in their assessment of the impact of the movement of the thousands of extra cars travelling along congested roads, the pollution levels, delays and gridlocks that will ensue. Even with the proposed A3 changes this still does not address the issues that will arise.

It would seem that GBC has decided that Send and Ripley are to be the fall guys in their planning due to our proximity to two major routes. I ask the Planning Inspector to please see some sense and consider the views of our communities. I personally have no problem with developments that reflect the need within our village but not this huge proposed over development in our area.

Attached documents:

Comment: MM42 - LPMM18/2997  Respondent: M Stokes 10903265  Agent:

I object to: MM42 Land at Burnt Common, London Road, Send, Policy A58

1. To the increase from 7000 to a minimum of 14,800 sq. m. This is the largest new industrial allocation in any village in the borough and on Green belt! Why when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.

2. There is no proven demand for this increase and the Employment Land Needs are showing a decline in demand for industrial land.

MM27 MM41 MM42 & MM48 Transport Strategy

The traffic implication for our village with all the new proposed development is untenable. GBC has not been clear in their assessment of the impact of the movement of the thousands of extra cars travelling along congested roads, the pollution levels, delays and gridlocks that will ensue. Even with the proposed A3 changes this still does not address the issues that will arise.
It would seem that GBC has decided that Send and Ripley are to be the fall guys in their planning due to our proximity to two major routes. I ask the Planning Inspector to please see some sense and consider the views of our communities. I personally have no problem with developments that reflect the need within our village but not this huge proposed over development in our area.

**Attached documents:**

**Comment:** MM44 - LPMM18/2998  **Respondent:** M Stokes 10903265  **Agent:**

I object to: MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63.

1. This was removed from the earlier draft but has now found its way back onto the agenda. It is on Green Belt land with no special circumstances and consequently contradicts policy MM9.
2. The added congestion along Send Marsh Road in both directions will increase pressure on the Send Crossroads and access onto London Road.

**Attached documents:**

**Comment:** MM48 - LPMM18/3003  **Respondent:** M Stokes 10903265  **Agent:**

MM27 MM41 MM42 & MM48 Transport Strategy

The traffic implication for our village with all the new proposed development is untenable. GBC has not been clear in their assessment of the impact of the movement of the thousands of extra cars travelling along congested roads, the pollution levels, delays and gridlocks that will ensue. Even with the proposed A3 changes this still does not address the issues that will arise.

It would seem that GBC has decided that Send and Ripley are to be the fall guys in their planning due to our proximity to two major routes. I ask the Planning Inspector to please see some sense and consider the views of our communities. I personally have no problem with developments that reflect the need within our village but not this huge proposed over development in our area.

**Attached documents:**

**Comment:** MM9 - LPMM18/2999  **Respondent:** M Stokes 10903265  **Agent:**

Changes in MM9 Green Belt Policy

GBC make an exception for limited infilling outside the identified village boundaries where it can be shown that the site should be considered within the village. This new policy could allow development to be picked off around the edge of the village and is an open invitation to developers and speculators.

**Attached documents:**
Comment: MM41 - LPMM18/539  Respondent: Linda Freeland 10903681  Agent:

MM41/42/44 - Garlicks Arch, Burnt Common, Aldertons Farm. Garlicks Arch and Burnt Common have seen substantial increases for development following the inspection and Aldertons Farm has appeared from nowhere. A revised (upward) total of 789 dwellings is now proposed, yet the Office of National Statistics, based on their published housing needs data, have determined this figure should be 431. What is the justification for the additional 358 dwellings? Pressure on local infrastructure and services will be unbearable.

Attached documents:

Comment: MM42 - LPMM18/540  Respondent: Linda Freeland 10903681  Agent:

MM41/42/44 - Garlicks Arch, Burnt Common, Aldertons Farm. Garlicks Arch and Burnt Common have seen substantial increases for development following the inspection and Aldertons Farm has appeared from nowhere. A revised (upwards) total of 789 dwellings is now proposed, yet the Office of National Statistics, based on their published housing needs data, have determined this figure should be 431. What is the justification for the additional 358 dwellings? Pressure on local infrastructure and services will be unbearable.

Attached documents:

Comment: MM44 - LPMM18/541  Respondent: Linda Freeland 10903681  Agent:

MM41/42/44 - Garlicks Arch, Burnt Common, Aldertons Farm. Garlicks Arch and Burnt Common have seen substantial increases for development following the inspection and Aldertons Farm has appeared from nowhere. A revised (upward) total of 789 dwellings is now proposed, yet the Office of National Statistics, based on their published housing needs data, have determined this figure should be 431. What is the justification for the additional 358 dwellings? Pressure on local infrastructure and services will be unbearable.

With so many arguments against the Plan, in particular the basis of estimating need and the unjustified destruction of the Green Belt, it is clear that this plan is not fit for purpose and should be rejected altogether.

Attached documents:

Comment: MM9 - LPMM18/538  Respondent: Linda Freeland 10903681  Agent:

I am strongly opposed to the latest Local Plan: Strategy & Sites and in particular the following:-

MM9 Green Belt Policy is designed to protect against overdevelopment unless there are exceptional circumstances. What are the exceptional circumstances in the cases of MM41, MM42 and MM44? This alone should be sufficient to reject these excessive and unsustainable proposals.

Attached documents:
MM27 MM41 MM42 MM48 Transport Strategy.

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.

The traffic on the North Bound A3 backs up from the M25 junction, "rat running" takes place off the Burnt Common exit and through Ripley village. This has not been referred to in any document.

The Southbound traffic backs up from Stag Hill to the Burpham Junction exit. This has not been referred to in any document.

None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.

Burnt Common roundabout will be gridlocked by the increase in the number of vehicles, of commuters, school run drivers and the manoeuvring of HGV vehicles visiting the proposed new industrial site at Burnt Common, and the new units in Send Business Centre.

Emotionally this is a Transport Strategy for disaster.

Attached documents:

Comment: MM41 - LPMM18/2239  Respondent: D White 10905185  Agent:

Guildford Local Plan OBJECTION

At a time when the Office of National Statistics has identified a drop in the need for both housing and industrial/warehousing, I am appalled that Guildford B.C. is still pursuing its on-going proposals for the destruction of the Green Belt and Send Village. It has ignored the 7000 objections for the Garlicks Arch proposal and clearly considers itself far better qualified than the residents to dictate the need for Send Villagers.

The campaign to Protect Rural England has stated that during 2017/2018 more than 5000 hectares of Green Belt have been released for development and further land is set for release. Such land is some of the most profitable and desirable for developers due to it being "shovel ready", surrounded by countryside (but not for long) and within commuting distance of towns and cities. It leaves little to the imagination that such development suggested by Guildford B.C will destroy the enviroment that developers prize so much in their bid to take the money and run. These comments are not emotional outpourings but simple facts.

To be more specific I OBJECT to:-

**MM41 Land at Garlicks Arch A43**

The latest amendment increases further destruction of the Green Belt by the increase of housing from 400 to 550 - 37%

I would ask where are these 1000 or so people going to be imported from?

All previous objections, which numbered some 7000, have been completely ignored. Perhaps this is an indication of what Guildford B.C. thinks of its residents.
The Green Belt ancient woodland is a target for removal by developers and I am fully aware how the bulldozers move in early and start work before complaints can be made to the local authority. **It happened in my road over a May Bank Holiday**, when some dozen mature oaks were felled. The recent Climate Change Summit recommended the increase of tree planting to combat increasing CO2 emissions. So Guildford knows better than the experts?

Send and Ripley villages will become one village created by linear development so loved by the planners in the 1950s.

The development will add some 800+ vehicles to the surrounding roads which are already congested with commuter and school run vehicles and were never designed to take today's volume of traffic.

The B2215 Portsmouth Road has proven a "rat run" for vehicles attempting to queue jump the holdup on the northbound A3.

The existing infrastructure of education and medical facilities have not been considered. Ripley School has closed, St Bedes School has been demolished and incorporated into Send C of E School and George Abbot Secondary School no longer takes children from the Send area. The parking movements outside Send C of E school during drop-off and pick-up times are dangerous for both parents and other road users and the recently installed centre refuge funnels vehicles closer to the pavement.

The only doctor's surgery is near capacity judging by appointment waiting times.

**MM27 MM41 MM42 MM48 Transport Strategy.**

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.

The traffic on the North Bound A3 backs up from the M25 junction, "rat running" takes place off the Burnt Common exit and through Ripley village. This has not been referred to in any document.

The Southbound traffic backs up from Stag Hill to the Burpham Junction exit. This has not been referred to in any document.

None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.

Burnt Common roundabout will be gridlocked by the increase in the number of vehicles, of commuters, school run drivers and the manoeuvring of HGV vehicles visiting the proposed new industrial site at Burnt Common, and the new units in Send Business Centre.

Emotionally this is a Transport Strategy for disaster.

**Attached documents:**

**Comment: MM42 - LPMM18/2240  Respondent: D White 10905185  Agent:**

**MM42 Land at Burnt Common Policy A58**

The majority of this land was, historically, Fogwills plant nursery and has never been industrial.

There is no requirement to create an industrial/warehousing use when Slyfield Estate has spare capacity.
There are no "special circumstances" especially when the Employment Land Needs Assessment shows a reduced requirement for industrial land as does the Office of National Statistics. **This therefore contradicts Policy MM9.**

The proposed expansion of this site to a minimum of 14,800sq.metres is in addition to the 25% increase at Send Business Centre and, yet again, the Employment Land Needs Assessment shows a reduced requirement.

The North Bound slip road of the A3 already takes "rat running" traffic which conflicts with the North and South bound traffic at the Burnt Common roundabout, most of which is attempting to access the A3 through Ripley village. Heavy Goods Vehicle movements in this immediate area will create nightmare congestion on, not only the A3, A247 Clandon Road and A247 Send Road. The local road network is not designed for such a volume of HGV traffic.

**MM27 MM41 MM42 MM48 Transport Strategy.**

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.

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None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.

Burnt Common roundabout will be gridlocked by the increase in the number of vehicles, of commuters, school run drivers and the manoeuvring of HGV vehicles visiting the proposed new industrial site at Burnt Common, and the new units in Send Business Centre.

Emotionally this is a Transport Strategy for disaster.

**Attached documents:**

**Comment:** MM48 - LPMM18/2238  **Respondent:** D White 10905185  **Agent:**

**MM27 MM41 MM42 MM48 Transport Strategy.**

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.

The traffic on the North Bound A3 backs up from the M25 junction, "rat running" takes place off the Burnt Common exit and through Ripley village. This has not been referred to in any document.

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None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.
Burnt Common roundabout will be gridlocked by the increase in the number of vehicles, of commuters, school run drivers and the manoeuvring of HGV vehicles visiting the proposed new industrial site at Burnt Common, and the new units in Send Business Centre.

Emotionally this is a Transport Strategy for disaster.

These OBJECTIONS are based on facts and it would be naive for Guildford B.C. and its associated developers to think that it is truly doing the residents of Send a huge favour.

Attached documents:

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Comment: MM9 - LPMM18/2241  Respondent: D White 10905185  Agent:

MM9 Green Belt Policy.

Guildford B.C suggests that their modification will protect the Green Belt, except in "exceptional circumstances". It is clear, from various statements made by G.B.C. that they have been unable to justify any exceptional circumstances. There are no excuses for the wanton private destruction of our, and NOT GBC's or developers', green and pleasant land.

Attached documents:

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Comment: MM2 - LPMM18/1414  Respondent: Joe Gervasio 10906145  Agent:

Regarding Policy S2, the Inspector at the Public Examination of the Local Plan used the figure for Guildford Borough housing need as 789 per year. A respected consultancy, Barton Willmore, has said that the correct figure should be 431. Even the Government’s Office for National Statistics, which does population forecasts, suggests in this September’s figures that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are considerably less than the total guessed-at by the Inspector. Therefore the housing need in Send should be reduced.

Overall, the increases in provision proposed in modifications MM41, MM42, MM48, on top of the already onerous proposed over-development in the area, further imbalances the delivery of housing in the borough to the North. I object in the strongest possible terms to the punishment this area is proposed to receive.

Attached documents:

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Comment: MM41 - LPMM18/1407  Respondent: Joe Gervasio 10906145  Agent:

I am writing to comment on the Main Modifications (MM) to the Guildford Local Plan.

I am a local resident and have lived in the village for over 30 years.

I object most strongly to the Transport Strategy relating to many of the modifications (MM41 MM42 and MM44 in particular). There has been no proper assessment of the impact so this is being proposed without any basis for mitigation. The impact is clearly going to be very great on the local roads and there is no proposal at all to alleviate it, never mind
demonstrate that any alleviation could be adequate. Any disinterested observer can see that the local roads are already beyond capacity with traffic jams regularly in the (I remind you) Green Belt villages of Ripley and Send.

Attached documents:

**Comment:** MM41 - LPMM18/1410  **Respondent:** Joe Gervasio 10906145  **Agent:**

I object to the ancient woodland at Garlick’s Arch being developed upon, and moreover the huge increase of over 35% in the proposal for houses on the site MM41. Over 7000 objections were received to this proposal, and the response was, rather than respect that, to actually INCREASE the impact. This will coalesce Ripley and Send, and as such breaks the planning guidelines in the NPPF. There is completely inadequate provision for local medical facilities to cope with such an increase, and no proposal for any mitigation. This alone is enough reason – people’s health – for this to be disallowed. The local Ripley School has just been closed, and this at a time when the local authority proposes to bring 800 more families into our villages!

Attached documents:

**Comment:** MM42 - LPMM18/1408  **Respondent:** Joe Gervasio 10906145  **Agent:**

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Attached documents:

**Comment:** MM42 - LPMM18/1413  **Respondent:** Joe Gervasio 10906145  **Agent:**

I object to the scale of the enlargement of the Industrial land at Burnt Common MM42. This proposal is now TWICE THE SIZE of the original proposal which was rejected in 2014! There is no requirement or special circumstances for industrial sites in the Green Belt, no demand for it locally, and there is already spare industrial capacity in the existing industrial area at Slyfield. This increase again has not been contextually consulted upon, and it runs counter to the Employment Land Needs Assessment that actually shows a reduction in demand for industrial land!

Attached documents:

**Comment:** MM44 - LPMM18/1409  **Respondent:** Joe Gervasio 10906145  **Agent:**
I am writing to comment on the Main Modifications (MM) to the Guildford Local Plan.

I am a local resident and have lived in the village for over 30 years.

I object most strongly to the Transport Strategy relating to many of the modifications (MM41 MM42 and MM44 in particular). There has been no proper assessment of the impact so this is being proposed without any basis for mitigation. The impact is clearly going to be very great on the local roads and there is no proposal at all to alleviate it, never mind demonstrate that any alleviation could be adequate. Any disinterested observer can see that the local roads are already beyond capacity with traffic jams regularly in the (I remind you) Green Belt villages of Ripley and Send.

Attached documents:

**Comment: MM44 - LPMM18/1412 Respondent: Joe Gervasio 10906145 Agent:**

I object to the inclusion of MM44 the land at Alterton’s Farm. This site was not in the last draft local plans. There has been no justification for its inclusion, again no provision for mitigation, and inadequate public consultation. This whole area in the north of the Borough is having by far the most development forced upon it, against local opinion and not addressing local needs, and this additional development which was not included in the Local Plan has further unbalanced the delivery of houses, which is a factor which should have received wider consultation. As to the site itself, again it is a Green Belt site, with no special or exceptional circumstances to justify development, and inappropriate in scale.

Attached documents:

**Comment: MM9 - LPMM18/1411 Respondent: Joe Gervasio 10906145 Agent:**

I object in principle and in practice to the modification of the Green Belt Policy MM9. The proposal that development can take place outside settlement boundaries where “the site should be considered to be within the village” means that a subjective judgement can be made to allow otherwise unjustified building on our Green Belt. This is in fact what is happening with the other proposals – no justification is given for using the Green Belt for development, yet it is being proposed on this basis.

I object to the use of the Green Belt land for mass housing provision. Sajid Javid, as Secretary of State for Communities and Local Government, has stated in Parliament that the Green Belt is ‘absolutely sacrosanct’. Guildford’s own development policy states the circumstances under which Green Belt may be built on: “Whilst most forms of development are considered inappropriate in the Green Belt, national planning policy lists certain exceptions which are not inappropriate. These are set out in paragraphs 89 and 90 of the National Planning Policy Framework. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land where it would not have a greater impact on the openness of the Green Belt.” So, nothing to that would provide for a huge sprawl of new houses then.

Attached documents:

**Comment: MM13 - LPMM18/3625 Respondent: Heather Thompson 10910753 Agent:**
I object to MM13 as there is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

**Comment:** MM2 - LPMM18/3623  **Respondent:** Heather Thompson 10910753  **Agent:**

I wish to take this opportunity to object to the following modifications to the local plan. The result of including these modifications would have a devastating effect on the lives of the people who live in the villages of Send, Ripley and Ockham. As a local resident, born and brought up in the area, I am aware that development is necessary if our children are to be able to stay in the area. Destroying village and community life, as would happen if all of these plans go ahead, is not the answer.

I object to MM2 as the housing target is wrong. As a result, I ask that the hearing be reopened so that the latest ONS figures and household projections can be taken into account. In addition, there should be no requirement for Guildford to take Woking’s unmet need, particularly as this will require further green belt release. The council has not properly followed its spatial strategy, which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

**Comment:** MM2 - LPMM18/3657  **Respondent:** Heather Thompson 10910753  **Agent:**

I should like to raise my objections to the proposed development of a number of sites in the village of Send. As you can see from the above, I am a resident of Ripley, but the lane in which I live is on the borders of the two villages and any development in Send will have a profound impact me and my family. In addition to this, I was born in Send and, therefore, feel that I have the right to air my views in the hope that some sanity may prevail.

Attached documents:

**Comment:** MM2 - LPMM18/3675  **Respondent:** Heather Thompson 10910753  **Agent:**

Although we are now only able to comment on the main modifications of the plan, it should be noted that the 100 houses proposed for Send Hill and Clockbarn, along with the 25% increase in the Send Business Centre. If this is added to the points covered above, it is clear that the heavy concentration of housing and industrial sights in Send will bring an end to the village and the the life of its inhabitants. Why the concentration in Send when the load could be shared more equably and more fairly with all of the other villages in the borough.

I believe that the local council has a duty of care to the communities they serve. We hope that these members have the best interests of their residents at heart. If this is the case, the objections above cannot be ignored.

Attached documents:
**Comment:** MM23 - LPMM18/3627  **Respondent:** Heather Thompson 10910753  **Agent:**

I object to MM23 (Policy D1) as it waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes). All means of travel should be accessible and helping to reduce the dependence on the motor car.

**Attached documents:**

**Comment:** MM40 - LPMM18/3628  **Respondent:** Heather Thompson 10910753  **Agent:**

I object to A35 – Three Farms Meadows

The addition of land to the south of the appeal site does not mitigate the density issue as much Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB

**Attached documents:**

**Comment:** MM41 - LPMM18/3626  **Respondent:** Heather Thompson 10910753  **Agent:**

I object to MM41 as the transport strategy relies on inadequate modelling, including the delay in J10 Highways England RIS scheme of at least two years which will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm]. There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

**Comment:** MM41 - LPMM18/3658  **Respondent:** Heather Thompson 10910753  **Agent:**

I object to MM14 - Garlick's Arch, Send Marsh, Policy A43

In the revised proposals the number of houses proposed for this site has been increased from 400 to 550 houses. This is an increase of 37%, despite the fact that the council received 7,000 objections to the initial plan. This is green belt land, containing ancient woodland, which seems to mean nothing to those who wish to see this part of the borough concreted over. This development would, in effect, destroy the individual nature of the two villages, joining them into one mass and, as such, must surely be considered as over development. The addition of so many people in this area would stretch the local services beyond capacity. There is only one primary school in the area as the other, in Ripley, has been closed. Also, the doctors surgery would not be able to cope with such a significant increase in patients. The addition of 800 extra cars on our already congested roads does not bear thinking about. The road in which I live is already a rat run, used by motorists who drop off the Portsmouth road at the Send Marsh junction. We already feel that we cannot walk along our road in the mornings and evenings due to the high volume of traffic. Polesden Lane is single track along much of its length and has no footpaths. Additional traffic along here would make our lives even more stressful.

**Attached documents:**
Comment: MM41 - LPMM18/3666  Respondent: Heather Thompson 10910753  Agent:

I object to MM27, MM41, MM42, MM48 Transport Strategy

The cumulative impact on the traffic and pollution issues on the village, when all of the proposed developments at Garlick's Arch, Clockbarn, Alderton's Farm, Gosden Hill and Wisley and Ockham, is totally unacceptable. Our road systems are already heavily congested, especially at key points in the day. My daughter lives on Send Road where it is often difficult to enter and exit her drive because of the ceaseless flow of vehicles. Crossing the road is perilous. The pollution levels are a real cause for concern as I have a young grandchild. We already know that far too many of today's youngsters suffer from asthma, a direct result of the increasing levels of pollution. This can only be exacerbated if these proposals go ahead.

Attached documents:

Comment: MM42 - LPMM18/3659  Respondent: Heather Thompson 10910753  Agent:

I object to MM42 - Land at Burnt Common, London Road, Send, Policy A58

I find it unfathomable how this site can have been deleted from the original plan and then increased twice, doubling its size from the initial proposal of 7000 square feet to 14,800 square feet. This is totally unnecessary when Slyfield has unused capacity. As such, it means taking green belt land when an already developed area is available. This is in addition to the 25% increase at Send Business Centre. These proposal constitutes the largest new industrial allocation in any village in the borough. There are no special circumstances and, therefore, this also contravenes MM9. To say that this is unfair is an understatement. In addition to this, the Employment Land Need Assessment showed a reductions in demand, not an increase, making such development unnecessary. Once again, I return to the issue of road congestion and, inevitably accompanying this, increased pollution. Nitrogen dioxide levels in the area are already dangerous. This traffic will have a knock on effect to the surrounding areas, which, once again, will impact negatively on our lives.

Attached documents:

Comment: MM42 - LPMM18/3670  Respondent: Heather Thompson 10910753  Agent:

I object to MM27, MM41, MM42, MM48 Transport Strategy

The cumulative impact on the traffic and pollution issues on the village, when all of the proposed developments at Garlick's Arch, Clockbarn, Alderton's Farm, Gosden Hill and Wisley and Ockham, is totally unacceptable. Our road systems are already heavily congested, especially at key points in the day. My daughter lives on Send Road where it is often difficult to enter and exit her drive because of the ceaseless flow of vehicles. Crossing the road is perilous. The pollution levels are a real cause for concern as I have a young grandchild. We already know that far too many of today's youngsters suffer from asthma, a direct result of the increasing levels of pollution. This can only be exacerbated if these proposals go ahead.

Attached documents:

Comment: MM44 - LPMM18/3662  Respondent: Heather Thompson 10910753  Agent:
I object to MM44 - Land at Alderton's Farm, Send Marsh Road, Policy A63

I cannot understand why his proposed development was deleted from an earlier draft as a result of all the objections and only re-inseted in July. This is a Green Belt site with no special circumstances and, once again, contradicts MM9. The increased traffic on Send crossroads will be considerable and, when considered alongside the other proposals, result in a 45% increase in housing in the village. This is clearly unfair, unacceptable and asking the impossible of our infrastructure. No one is disputing the need to build in order to provide homes for people, but the scale of these proposals will destroy the village of Send and merely contribute to the urban sprawl. It seems that Guildford Borough Council has its sights set on this destruction. Is it purely cynical to wonder why so much of the county's building plans concentrate on two small villages, Send and Ripley, both held by members of minority groups on the Conservative led council?

Attached documents:

Comment: MM48 - LPMM18/3674  Respondent: Heather Thompson 10910753  Agent: 

I object to MM27, MM41, MM42, MM48 Transport Strategy

The cumulative impact on the traffic and pollution issues on the village, when all of the proposed developments at Garlick's Arch, Clockbarn, Alderton's Farm, Gosden Hill and Wisley and Ockham, is totally unacceptable. Our road systems are already heavily congested, especially at key points in the day. My daughter lives on Send Road where it is often difficult to enter and exit her drive because of the ceaseless flow of vehicles. Crossing the road is perilous. The pollution levels are a real cause for concern as I have a young grandchild. We already know that far too many of today's youngsters suffer from asthma, a direct result of the increasing levels of pollution. This can only be exacerbated if these proposals go ahead.

Attached documents:

Comment: MM50 - LPMM18/3629  Respondent: Heather Thompson 10910753  Agent: 

I object to MM47 as the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary. The biodiversity of the SNCI will be destroyed by the proposed development. An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

Attached documents:

Comment: MM9 - LPMM18/3624  Respondent: Heather Thompson 10910753  Agent: 

I object to MM9 as the infilling in and around villages will result in the weakening of protection of the countryside. If this modification of the local plan is accepted it will result in the loss of separate identities for the villages if Send and Ripley.

Attached documents:
Comment: MM9 - LPMM18/3664  Respondent: Heather Thompson 10910753  Agent:

I object to MM9 - Green Belt Policy

The claim that the modifications protect the Green Belt 'except in very special circumstances' is questionable. The inclusion of 'limited infilling outside the settlement boundaries where it can be demonstrated that the site should be considered to be within the village' is highly subjective and open to interpretation. It does not constitute protection for the Green Belt in any way.

Attached documents:

Comment: MM45 - LPMM18/1334  Respondent: Claire Walker 10911201  Agent:

As far as I can see there are no exceptional circumstances that justify taking this site out of the green belt. Planning permission has already been turned down for this site on a previous occasion for the very reason that it would be damaging to the openness of the green belt.

we have no facilities in Flexford or Normandy so additional housing on this scale will do nothing to secure the future of village facilities. In fact it will put a tremendous strain on our doctors surgery and primary school.

The majority of people living in Glaziers Lane at present own at least one car and use it daily. The effect of a further 200 cars using this D road would be a disaster. The access would be where pedestrians have to cross the lane to the other side because the pavement stops on one side and continues on the other, just before a bridge with a blind summit.

Glaziers Lane frequently floods, so removing the sponge effect of green fields and replacing with 105 houses would take away the effect of the fields and further increase the problem of flooding. To say nothing of the problems with sewage which has over the last few years run freely into the stream on our field boundary and into the adjoining fields.

If houses need to be built in Normandy, and I think the number needed is incorrect and overinflated, then build them on brownfield sites and in numbers that can be sustained by the infrastructure and the existing residents.

I strongly object to this modification of the local plan.

Attached documents:

Comment: MM2 - LPMM18/1615  Respondent: Ray Partridge 10911297  Agent:

Expert advice indicates that Guildford's new home need is 360 in order to support ambitious economic growth. This is much less than the figure of 672 being used to support the widespread allocation of Green Belt to housing. This figure of 672 needs re-examining. My comments are below on amendment -

MM2 - the base figure of 630 plus 42 for Woking is out of step with ONS figures and the Government's standard model. It is based on incorrect assumptions, particularly with regard to student houses and low economic participation. These inflate the figures.

MM2 - it is wrong to ask Guildford to sacrifice Green Belt to provide homes for Woking. In any event the Woking need is also less than stated and should be re-examined.

Attached documents:
Comment: MM3 - LPMM18/1616  Respondent: Ray Partridge 10911297  Agent:

MM3 - there should be a policy on urban areas beyond the town centre to encourage a co-ordinated approach to site assembly, where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM35 - LPMM18/1617  Respondent: Ray Partridge 10911297  Agent:

MM35 - Gosden Hill is a particularly effective area of Green Belt and should not be given over to housing.

Attached documents:

Comment: MM36 - LPMM18/1618  Respondent: Ray Partridge 10911297  Agent:

MM36 - Blackwell Farm should be retained as Green Belt as revised housing need figures do not justify development.

Attached documents:

Comment: MM43 - LPMM18/1619  Respondent: Ray Partridge 10911297  Agent:

MM43/44/45 - sites at Chilworth, Send and Flexford should be kept as Green Belt as revised housing need figures do not justify the sacrifice of this precious resource to housing.

Attached documents:

Comment: MM44 - LPMM18/1620  Respondent: Ray Partridge 10911297  Agent:

MM43/44/45 - sites at Chilworth, Send and Flexford should be kept as Green Belt as revised housing need figures do not justify the sacrifice of this precious resource to housing.

Attached documents:

Comment: MM45 - LPMM18/1621  Respondent: Ray Partridge 10911297  Agent:
MM43/44/45 - sites at Chilworth, Send and Flexford should be kept as Green Belt as revised housing need figures do not justify the sacrifice of this precious resource to housing.

Thank you for providing this consultation opportunity.

Attached documents:

Comment: MM9 - LPMM18/2604  Respondent: Ray Partridge 10911297  Agent:

It has been brought to my attention that Worplesdon is included in MM9 of the Local Plan.

Worplesdon is in Green Belt and has a defined settlement and conservation areas. The guidelines under the heading Green Belt say that inappropriate development will not be permitted unless very special circumstances can be demonstrated and goes on to say that a very special circumstance would be where the potential harm is clearly outweighed by other considerations. With due respect these are catch-all phrases which can allow the planners to approve almost anything. I know because we have seen a neighbour's application in Green Belt approved in such circumstances.

The Green Belt should be protected. Strictly controlled infilling may be appropriate, but extensions into Green Belt should not be allowed. Worplesdon should be removed from the list of areas where limited infilling is allowed outside the settlement area.

---------------------------------------- added at later date--------------------------------------------------

Further to my email yesterday regarding the inclusion of Worplesdon in MM9 of the Local Plan. I now understand that Worplesdon should have been listed in red, to show that it is an addition. Instead it is listed in black which implies that it has been listed for some time and that there has been time for consultation. In fact it has been added at the last minute in a manner which could be considered as designed to avoid scrutiny and consultation.

This is unacceptable. It raises the possibility that other similar changes have been made. The consultation period should be extended to allow a proper study of, and consultation on, the final version of the Plan.

Attached documents:

Comment: MM13 - LPMM18/3301  Respondent: Peter P. Earle 10911617  Agent:

MM13 There is too much allocation for retail use in the town centre. The evidence base used for retail demand is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/3299  Respondent: Peter P. Earle 10911617  Agent:

WISLEY AIRFIELD PLANNING - OBJECTION
I am writing to object to the current proposal by GBC re the use of Wisley Airfield for housing. The following points need to be considered:

**GENERAL**

- **MM2** The housing target is wrong. The hearing should be reopened so that the latest ONS figures and household projections can be taken into account.
- **MM2** There should be no requirement for Guildford to take Woking’s unmet housing need, particularly as this will require further green belt release.
  - The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt.

The addition of another 500 houses in Send (which will be car dependent) would have a severe detrimental impact on Portsmouth Road in Ripley which has not been properly considered.

**Attached documents:**

**Comment:** MM23 - LPMM18/3303  **Respondent:** Peter P. Earle 10911617  **Agent:**

**MM23 (Policy D1)** Reduces the requirement for the social dimension of sustainability (e.g. walking distances and pedestrian and cycle routes)

Strategic sites are to be exempt from design constraints.

There is no evidence that recent case law such as “People over Wind” has been taken into account.

**Attached documents:**

**Comment:** MM3 - LPMM18/3304  **Respondent:** Peter P. Earle 10911617  **Agent:**

**S3** The town centre policy is inadequate and does not address the infrastructure deficit.

**Attached documents:**

**Comment:** MM40 - LPMM18/3305  **Respondent:** Peter P. Earle 10911617  **Agent:**

**SITE SPECIFIC – A35 – Three Farms Meadows**

  - The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR.
  - Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.
**Comment: MM41 - LPMM18/3302**  **Respondent:** Peter P. Earle 10911617  **Agent:**

**MM41** Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years, which will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43–Garlicks Arch; MM44 – Aldertons Farm].

There is too much reliance on the A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

**Comment: MM50 - LPMM18/3306**  **Respondent:** Peter P. Earle 10911617  **Agent:**

**MM47** The size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed, which is in breach of case law.

I look forward too receiving confirmation of receipt of my objection.

**Attached documents:**

**Comment: MM9 - LPMM18/3300**  **Respondent:** Peter P. Earle 10911617  **Agent:**

**MM9** Infilling in and around villages will result in the weakening of protection of the countryside.

**Attached documents:**

**Comment: MM2 - LPMM18/5040**  **Respondent:** Jacqui Stanford 10913217  **Agent:**

I would like to support the GVG’s initiative and thereby declare the Local Plan as unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and they are beyond the council’s control
3. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

4. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination

5. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

It needs to be reviewed and the suggestions made by GVG taken seriously. They have the best intentions and ideas for Guildford moving forward - please re think the Local Plan, listen to them and try to implement their ideas.

Attached documents:

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**Comment: MM41 - LPMM18/5600  Respondent: Isabelle Stevens 10913377  Agent:**

**Re: Guildford Local Plan – Main Modifications 2018**

I wish to object to the modifications you have made the Guildford local plan.

I strongly object to MM4, Policy A43 at Garlick’s Arch Send Marsh to build a vast housing estate with the now increased number of 550 houses. Four hundred houses is far too many new houses for our small village to absorb. Send will become over developed and will lose its village character completely. The villages of Ripley and Send will become indistinct and our beautiful green belt land will be eroded and lost for all time. Pollution levels will increase as will congestion because there will be so much more traffic on our roads. For each house built there is likely to be two cars which ultimately means around 1100 more even if this is not immediate – it will be inevitable. Additionally, it is another area in Send that is subject to frequent flooding and has currently a flood zone 2 allocation. If you remove it from greenbelt and build on it, you will be completely destroying the beautiful ancient woodland dating back to Tudor times.

Attached documents:

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**Comment: MM42 - LPMM18/5601  Respondent: Isabelle Stevens 10913377  Agent:**

I object to Policy A58 at Burnt Common. It is not clear why an industrial development is required when there are empty sites and industrial units at Slyfield and in Guildford.

Attached documents:

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**Comment: MM44 - LPMM18/5602  Respondent: Isabelle Stevens 10913377  Agent:**

I object to MM44 – Policy A63 – land at Alderton’s Farm, Send Marsh Road. This was deleted from an earlier draft because of the number of objections and not re-inserted until the public examination in July and it therefore seems underhand. Alderton’s Farm is a Green Belt site and has no special circumstances so it would completely contradict policy MM9. Not only would it detract from the lovely rural character of the village, it would add an immediate 120 new homes to the village which means 240 new cars – as very few families only have one car each. This alone would have a detrimental impact on the village in terms of congestion and pollution and yet these new houses together with the
Garlick’s Arch, Clockbarn and Winds Ridge development would add a further 770 new houses to Send which is a 45% increase.

It seems to me that Send is being allocated a huge chunk of Surrey’s housing burden and to expect our village to absorb this is not right. It has to be shared out more evenly with other villages.

**Attached documents:**

**Comment:** MM2 - LPMM18/1701 **Respondent:** Stuart Ray 10915713 **Agent:**

My First objections are to: MM41, MM42, MM44, MM9, MM27.

**POLICY S2.**

At the public examination the figure for Guildford B.C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. (This is illegal by law you have to show how you have arrived at such figures... To this end Police involvement may be necessary as fraud may have taken place.)

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspicious.

My expectation is that the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

**Attached documents:**

**Comment:** MM27 - LPMM18/1702 **Respondent:** Stuart Ray 10915713 **Agent:**

MM27. MM41, MM42, and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill, Wisley and Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. It seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

This massive increase in traffic and associated air pollution will affect pupils of Send 1st school which will take brunt of the increased pollution as will St Beads middle school. The dropping off of children at Send 1st school is already absolute mayhem and it is only a question of time before a fatality happens. With an increase of traffic the chances of a fatality goes up exponentially.
Comment: MM41 - LPMM18/1703  Respondent: Stuart Ray 10915713  Agent:

MM27, MM41, MM42, and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill, Wisley and Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. It seem both the developers and GBC to offer narrative and not action.

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This massive increase in traffic and associated air pollution will affect pupils of Send 1st school which will take brunt of the increased pollution as will St Beads middle school. The dropping off of children at Send 1st school is already absolute mayhem and it is only a question of time before a fatality happens. With an increase of traffic the chances of a fatality goes up exponentially.

Comment: MM41 - LPMM18/1706  Respondent: Stuart Ray 10915713  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43.

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.

This is an increase of 37% in the number of houses to be built and I can only assume that the Conservative Guildford Borough Council are punishing Send for throwing out the Conservative Councillors and electing Green Belt Councillors.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the objections have died down and nobody is checking.

This overdevelopment will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

This site is contaminated by lead from many years of Clay Pigeon Shooting and is prone to frequent flooding.

Up to a thousand cars and between 1600 to 1700 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

I am Treasurer of our Local PPG (Patients Participation Group) and confirm that our local Health Centre is already oversubscribed and working in overwhelming conditions.

There is no money to build any extension or employ more health staff. Again the local infrastructure will be totally overwhelmed.
You already have over 7000 objections to the earlier plans but these objections have been totally ignored and more houses etc added?

Attached documents:

Comment: MM42 - LPMM18/1704  Respondent: Stuart Ray 10915713  Agent:

MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill, Wisley and Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. It seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

This massive increase in traffic and associated air pollution will affect pupils of Send 1st school which will take brunt of the increased pollution as will St Beads middle school. The dropping off of children at Send 1st school is already absolute mayhem and it is only a question of time before a fatality happens. With an increase of traffic the chances of a fatality goes up exponentially.

Attached documents:

Comment: MM42 - LPMM18/1707  Respondent: Stuart Ray 10915713  Agent:

MM42. Land at Burnt Common, London road Send Policy A58.

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land why has again Send been picked on again to have the largest industrial allocation in any village in the Borough, is it politics?

This is a further increase of 25% making it a huge increase in Send, bigger than any other village.

There is no need for new industrial sites when Slyfield is has unused capacity There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.

There is no need to put Industrial premises in our precious GREEN BELT, except if as a Council Cabinet you want to punish Send.

This plan has since being deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.

Attached documents:
Comment: MM44 - LPMM18/1709  Respondent: Stuart Ray 10915713  Agent:

MM44 Land at Aldertons Farm, Send Road, Policy A63.

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY.

With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%

How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment.

Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

Attached documents:

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Comment: MM48 - LPMM18/1705  Respondent: Stuart Ray 10915713  Agent:

MM27, MM41, MM42, and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account ?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill, Wisley and Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. It seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

This massive increase in traffic and associated air pollution will affect pupils of Send 1st school which will take brunt of the increased pollution as will St Beads middle school. The dropping off of children at Send 1st school is already absolute mayhem and it is only a question of time before a fatality happens. With an increase of traffic the chances of a fatality goes up exponentially.

Attached documents:

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Comment: MM9 - LPMM18/1710  Respondent: Stuart Ray 10915713  Agent:

MM9 GREEN BELT POLICY.

How can you say the modifications claim to protect our precious GREEN BELT except in very special circumstances ?

GBC make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN

BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE.
This is a catch all statement which is completely subjective causing complete uncertainty and completely negates GREEN BELT PROTECTION.

Virtually any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish all the above objections to be considered and this huge imposition of housing and commercial development that is simply not needed for it to be largely abandoned as Send Village is presently at bursting point.

It is so obvious to all and sundry this is not being done to government requirements but for private gains!

Attached documents:

Comment: MM27 - LPMM18/4764  
Respondent: Katharine Moss 10918273  
Agent:

MM27. MM41. MM42. and MM48-Transport Strategy.  
This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why? 
The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane.

This massive increase in traffic of all sorts heading to and from Woking along Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM41 - LPMM18/4760  
Respondent: Katharine Moss 10918273  
Agent:

MM41-Land at Garlicks Arch, Send Marsh – Policy A43  
I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.
This is an increase of 37% in the number of houses to be built when the original proposed number of houses received 7000 OBJECTIONS. This suggests a flawed consultation process! We are not being listened to!

Equally during this ongoing process there is already an ‘under the radar’ increase in housing numbers in Send. These are ongoing small ‘in-fill’ housing developments, two or three houses popping up in Send and it’s close proximity – these houses are not being taken of the target figures! We are also aware of other significant (40 and 60 houses) developments in progress in the area too! There are already too many houses in this area.
The ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking.
This over development will join Ripley to Send, and spoil the intention and foresight of our Green Belt Planners of many years ago.
This site is contaminated by many years of Clay Pigeon Shooting and is prone to frequent flooding.
Up to a 1000 cars and between 1600 to 1700 extra people will completely block the surrounding roads. It is almost impossible to move out of my drive onto the road if there are problems on the A3. Send regularly comes to a standstill if the A3 or M25 has a problem.

The area’s services (schools, roads, health facilities, sewage, water etc) are already at full capacity.

At the public examination the figure for Guildford.B.C housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated.

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year. Why is the requirement to build a vast majority of these houses in Send? We have a poor road system and NO train service!

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspect.

The Inspector and GBC must seriously reduce the housing need to reflect the true figures, and notably in our already very congested village of Send.

Attached documents:

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Comment: MM41 - LPMM18/4766  Respondent: Katharine Moss 10918273  Agent:

MM27. MM41. MM42. and MM48-Transport Strategy.

This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane.

This massive increase in traffic of all sorts heading to and from Woking along Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

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Comment: MM42 - LPMM18/4761  Respondent: Katharine Moss 10918273  Agent:

MM42-Land at Burnt Common, London Road, Send, Policy A58

The Employment Lands Needs Assessment showed a reduction in demand for Industrial Land.

This plan was deleted in 2014 plans, however this has subsequently been increased TWICE from 7000 to a MINIMUM of 14,800sqm! Therefore why is Send been given this HUGE increase when there is NO NEED and it will make Send the village with the largest industrial allocation of any village in the borough! WHY when Slyfield which is sufficiently close by has unused capacity!
There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.
There is no need to put Industrial premises in our precious GREEN BELT.
Surrounding roads will be further gridlocked causing an increase in already high Nitrogen Dioxide levels!

Attached documents:

Comment: MM42 - LPMM18/4769  Respondent: Katharine Moss 10918273  Agent:

MM27, MM41, MM42, and MM48-Transport Strategy.
This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why?
The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane.

This massive increase in traffic of all sorts heading to and from Woking along Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM44 - LPMM18/4762  Respondent: Katharine Moss 10918273  Agent:

MM44-Land at Aldertons Farm, Send Road, Policy A63.
New site for 120 homes which was deleted because of objections, this was reinserted for public examination in JULY. With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%!
Our roads, sewage, water, healthcare, schools will prevent us from being able to live normal lives in this polluted gridlocked stressful environment.
Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

Attached documents:

Comment: MM48 - LPMM18/4768  Respondent: Katharine Moss 10918273  Agent:

MM27, MM41, MM42, and MM48-Transport Strategy.
This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why?
The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave
their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane.

This massive increase in traffic of all sorts heading to and from Woking along Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM9 - LPMM18/4763  Respondent: Katharine Moss 10918273  Agent: MM9 GREEN BELT POLICY.
These modifications claim to protect our precious GREEN BELT-they DO NOT! These are NOT very special circumstances?
GBC make an exception for limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered; this catch all statement is completely subjective, makes the edges of villages ‘open season’ to developers and therefore completely negates GREEN BELT PROTECTION policy.

Send is CANNOT accommodate any commercial or huge housing developments. As villagers, at times, we cannot move in our vehicles to our places of work, this will also be the same for emergency vehicles, walk safely along our pavements, our village school is at capacity, secondary school placements are a huge problem, we fight to get a Drs appointments and know that our utility services in the area are already struggling.

Attached documents:

Comment: MM2 - LPMM18/5288  Respondent: Angus MacDonald 10918657  Agent: I object - on the following grounds:

The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt.

I have not been advised of the consultation

The examination in public should be reopened so that the latest Office of National Statistics can be used

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM40 - LPMM18/4371  Respondent: Gillian Lachelin 10918977  Agent:
I am writing to very strongly object to the inclusion of the Three Farms Meadows/Former Wisley Airfield site in the GBC Local Plan on several grounds.

The planning application was rejected by GBC. I attended the public enquiry last autumn and the appeal was rejected. The plan was, as I recall, described as catastrophic by the inspector. The modified submission is similarly catastrophic. The impact on the area and particularly on the local traffic would be absolutely horrific.

There are no exceptional circumstances which would allow building on the green belt. Development should take place on brownfield sites and not on the green belt. The housing target numbers are wrong and should be reexamined using the latest ONS statistics.

Attached documents:

Comment: MM27 - LPMM18/2325  Respondent: J.A. Millard 10919841  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The development of the Clandon slip roads on the A3M will cause the local roads to be completely overwhelmed. Already the traffic from Burnt Common to Woking is horrendous and this development will cause it to virtually gridlock. None of this will be to the benefit of the land inhabitants who will also suffer increased pollution. I object to this proposal.

Attached documents:

Comment: MM41 - LPMM18/2321  Respondent: J.A. Millard 10919841  Agent:

I am writing to strongly object to a series of Main Modifications in the Guildford Local Plan.

MM41 Land at Garlicks Arch. The increase in the number of homes is excessive and ignores the numerous previous objections. It will create urban sprawl between Ripley and Send and significantly adversely impact on the green space in the local area. Local facilities (schools and medical centre) will not be able to accommodate such a large increase in population. I object to this proposal.

Attached documents:

Comment: MM41 - LPMM18/2326  Respondent: J.A. Millard 10919841  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The development of the Clandon slip roads on the A3M will cause the local roads to be completely overwhelmed. Already the traffic from Burnt Common to Woking is horrendous and this development will cause it to virtually gridlock. None of this
The increase in the size of industrial and storage area is completely unjustified. This proposal was previously deleted from the plan in 2014 but has re-appeared for no good reason. This development will ruin Green Belt land and significantly add to the pollution already generated by the M25 and A3M motorways. The Employment Land Needs Assessment showed there is actually a reduction in demand for industrial land and it is also known that Slyfield has capacity. The increased Send Business Centre will fulfill demand. I object to this proposal.

Attached documents:

Comment: MM42 - LPMM18/2327  Respondent: J.A. Millard 10919841  Agent:

MM42 Land at Burnt Common

The development of the Clandon slip roads on the A3M will cause the local roads to be completely overwhelmed. Already the traffic from Burnt Common to Woking is horrendous and this development will cause it to virtually gridlock. None of this will be to the benefit of the land inhabitants who will also suffer increased pollution. I object to this proposal.

Attached documents:

Comment: MM44 - LPMM18/2323  Respondent: J.A. Millard 10919841  Agent:

MM44 Land at Alderton's Farm. This is another gross floating of the Green Belt and a further deduction of the environment. This development together with the many others proposed will add 45% to the number of residents in Send. It will significantly adversely affect one of the most historic and beautiful parts of Send at Send Marsh Green. I object to this proposal.

Attached documents:
Comment: MM48 - LPMM18/2328  Respondent: J.A. Millard 10919841  Agent: 

MM27, MM41, MM42 and MM48 Transport Strategy

The development of the Clandon slip roads on the A3M will cause the local roads to be completely overwhelmed. Already the traffic from Burnt Common to Woking is horrendous and this development will cause it to virtually gridlock. None of this will be to the benefit of the land inhabitants who will also suffer increased pollution. I object to this proposal.

In summary, I'm absolutely appalled by the above Main Modifications and the other developments that have been approved for Send Village. The concentration of all these developments in Send village is completely disproportionate and is vindictive in the local inhabitants. None of this is for the benefit of the local inhabitants who have not requested any of it. You should be utterly ashamed of yourselves as the so called Planning Policy Team and remember who pays your taxes and therefore your wages. Its very obvious that Send Village has been effectively pilled on as ripe for development and expendable. Every ruse has been used to overcome the protection of the Green Belt and destroy this local environment. The way proposals have been conveyed from nothing (i.e no local demand) been dismissed and unnecessarily revived suggests a system that is rotten to the core.

Attached documents:

Comment: MM9 - LPMM18/2324  Respondent: J.A. Millard 10919841  Agent: 

MM9 Green Belt Policy.

This policy effectively drives a coach and horses through the principle of Green Belt protection. Its subjectiveness undermines all Green Belt in Guildford and alters games to be played to the benefit of developers and the disbenefit of local inhabitants. I object to this proposal.

Attached documents:

Comment: MM2 - LPMM18/578  Respondent: Sebastian Forbes 10920865  Agent: 

1.  d) Have you responded to the view of the Employment Land Needs Assessment (showing a reduction in demand)?

Attached documents:

Comment: MM27 - LPMM18/580  Respondent: Sebastian Forbes 10920865  Agent: 

In response to the information sent to everyone by the Save Send Action Group, I find myself saying the same things as I have done two or three times previously. I do so, not as someone with a principal feeling for Send, since my road lies between Send and Ripley, and we feel that we belong more to Ripley than to Send. But the implications of poor planning are the same.

Years ago, our road's AGM invited someone from the planning department to chat. We actually heard that planning for houses comes first and that 'the infrastructure will follow'. What rubbish! Fundamental to all this is to assure us all that roads will cope. Roads don't cope at present.

I don't object to the creation of two new slip roads to the A3. Indeed, I have urged just this for years. That would surely improve traffic flow. Perhaps there should be traffic lights at the junction of Portsmouth / London Roads and the A 247. Much else of this kind of thinking is vital before houses are considered.

More questions:

1. a) Do we really need so many new houses in Send?
2. b) Has the ground at MM41 been properly studied?
MM27, MM41, MM42, and MM48: When will the traffic implications be properly addressed?

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/4840</th>
<th>Respondent: Mark Stevens 10920961</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Guildford Local Plan: Strategy and Sites – Main Modifications</strong></td>
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<tr>
<td>Once more I write to object to the village of Send being disproportionately targeted for building development. I do not think you are taking the views of existing residents into consideration with your plans.</td>
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<td>I particularly object to the MM41 land at Garlick’s Arch, Send Marsh, Policy A43 where your plan is to build a huge estate of 550 homes. This would be a simply ridiculous number of new homes for our village to absorb, causing catastrophic over-development and changing the nature of our lovely village for ever. It will also further erode the beautiful green belt land, joining the villages of Ripley and Send to a degree that would make them indistinguishable. Quite apart from the development itself will be the horrendous traffic congestion which will undoubtedly result from such a development. It is certain to create a gridlock in the surrounding roads and completely spoil the environs. With 550 new homes one could reasonably expect a further 1100 more cars on the roads in this area, a network which already grinds to a halt at the moment when the A3 invariably chokes.</td>
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<td>It is already evident that your planners have a tendency to squeeze in as many homes as possible without realistic provision for parking (my own development, barely 10 years old suffers from this and I know of others within a short distance which suffer from the same problem). With the increased traffic will come the increased noise and pollution, ruining our village life permanently. Current residents greatly value the greenbelt surrounding our village, it’s what drew many of us here and is an increasingly rare characteristic of village life in Surrey which we seek to protect. We value the 500 year old ancient woodland and the green countryside; we want it to be there for the next generation to enjoy also.</td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment: MM42 - LPMM18/4846</th>
<th>Respondent: Mark Stevens 10920961</th>
<th>Agent:</th>
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<tr>
<td>I object to MM42 Policy A58 at Burnt Common. I can see no necessity for an industrial development here when there are empty sites and empty units at Slyfield and nearby Guildford. You are not making the most of the established brown field sites already in the area. This development was removed from the 2014 plan and is now being presented in a vastly increased form. It contradicts MM9 and there are no special circumstances to endorse it. It is also by far the biggest new industrial allocation to any village in the borough and yet the Employment Land Needs Assessment showed a reduction in demand for industrial land. A village which struggles with existing traffic levels does not need the addition of further commercial vehicles.</td>
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<td>I need hardly add that these are not the full extent of developments you are trying to push through in the immediate area. There remains plans for housing in Send Hill (and a Traveller’s site), houses at Clockbarn in Tannery Lane and a significant increase in the size of the Send Business Centre, within the Wey Conservation area.</td>
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<td>Any of these significant developments would represent a heavy concentration on one village. They are unreasonable, unplactical and should be abandoned forthwith.</td>
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<td><strong>Attached documents:</strong></td>
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</table>
Comment: MM44 - LPMM18/4842  Respondent: Mark Stevens 10920961  Agent:

For similar reasons I object to MM44 land at Alderton’s Farm, Send Marsh Road Policy A63. The extra 120 homes will cause similar disruption even if it is on a lesser scale. Combined with the plans for Garlick’s Arch would mean a total of 1540 extra cars on roads that struggle with existing traffic levels. It simply is not practical. It is over-development on a totally unsympathetic scale, will ruin the village, cause appalling congestion and have a significant impact on pollution levels in the area. The resulting Nitrogen Dioxide levels will be a particular blight to local children and elderly people alike, increasing cases of asthma in a community which has worked hard to set up home here in what we strive to keep as a pleasant and welcoming village environment.

Attached documents:

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Comment: MM2 - LPMM18/3595  Respondent: Arthur Thomas 10922017  Agent:

My objections are made in the knowledge of other development in Send eg 40 houses at Send Hill, 60 houses at Clockbarn and a 25% increase in Send Business Park for which we cannot now object to. It does appear to me that Send has been particularly burdened with over-development, more so than any other Village. The increase in people and traffic will give rise to congestion, pollution, inadequate schools and medical facilities, etc, and will be detriment to all who live here and for future generations.

Attached documents:

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Comment: MM41 - LPMM18/3590  Respondent: Arthur Thomas 10922017  Agent:

MM41 Garlicks Arch

I objected to any development on this land when it was first proposed. Despite several thousand objections at the time, this has completely been ignored and you now propose to INCREASE the original number of dwellings from 400 to 550. This is an insult to those who wrote and objected and says very little for the democratic process.

My concerns are as before, that the infrastructure around Send will be unable to cope with the large influx of people to the area, school and medical facilities will not be adequate, roads will not be able to cope with the extra traffic and which are already crowded particularly at morning and evening peek times. This is Green Belt land, it has ancient woodland on it and I understand it is contaminated with lead shot and is subject to flooding, it should not be built on.

Attached documents:

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Comment: MM42 - LPMM18/3591  Respondent: Arthur Thomas 10922017  Agent:

MM42 Land at Burnt Common

The proposals for industrial use is the largest allocation in any village in the borough. There is already a Business Centre at Tannery Lane Send. There is no demand and therefore no need to allocate land on Green Belt for industrial use at this location when more appropriate land is available at Slyfield. The local roads are inadequate for heavy traffic and industrial vehicles will add to the pollution.
Comment: MM44 - LPMM18/3592  Respondent: Arthur Thomas 10922017  Agent:

MM44 Land at Alderton Farm

I understand this was deleted from an earlier draft due to all the objections but has now been re-inserted. The objections remain the same ie it is Green Belt and there are no special circumstances so it also contradicts policy MM9; it will detract from the 'Village Green' and ancient buildings around the Green; the identity of Send Marsh as a separate village from Send will be lost with the infilling of houses; the local roads will be unable to cope with the increase in traffic particularly at the already dangerous hairpin cross roads at the Green. This development together with others in the area will add 770 houses to the 1700 houses currently in Send, an increase of 45%. The local infrastructure will be unable to cope with such a large increase.

Comment: MM9 - LPMM18/3593  Respondent: Arthur Thomas 10922017  Agent:

MM9 Green Belt Policy

I object to the qualification 'limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the the village'. This would appear to allow development on any Green Belt land on the boundary of Send.

Comment: MM27 - LPMM18/5637  Respondent: Kathleen Grehan 10922689  Agent:

1. MM27 MM41 MM42 and MM48 Transport Strategy

Changes in the various transport strategies will in no way solve the problem of the increased traffic that will be produced by all the planned developments. It is more likely to make the situation worse.

It seems Send is getting far more than its fair share in this plan. Why is that? We have certainly submitted plenty of objections to the Local Plan at the various stages but it seems to have no effect. I have lost all faith in the planning process. If the burden was shared out more fairly the traffic problem would be diluted.

Comment: MM41 - LPMM18/5630  Respondent: Kathleen Grehan 10922689  Agent:
MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Increased from 400 to 550 houses

My objections to MM41 are the same as those for MM42 and MM44.

The local plan now includes a 45% increase in the number of houses in Send. How can the infrastructure, the roads, the public services, the medical facilities, the schools cope with such a huge increase in the population of Send? I live on Send Road and every day I have large volumes of traffic crawling along Send Road in both directions at peak times. Often the traffic is at a stand still for long periods of time. So the air quality along Send Road is very poor as it is full of exhaust fumes. We can no longer expect parents to walk their children to school when they are breathing in these exhaust gases. This can only get worse with increased development.

It seems the Green Belt has lost all its protection in this area if it can be violated in such a way with no 'special circumstances'.

Attached documents:

Comment: MM41 - LPMM18/5635  Respondent: Kathleen Grehan 10922689  Agent:

1. MM27 MM41 MM42 and MM48 Transport Strategy

Changes in the various transport strategies will in no way solve the problem of the increased traffic that will be produced by all the planned developments. It is more likely to make the situation worse.

It seems Send is getting far more than its fair share in this plan. Why is that? We have certainly submitted plenty of objections to the Local Plan at the various stages but it seems to have no effect. I have lost all faith in the planning process. If the burden was shared out more fairly the traffic problem would be diluted.

Attached documents:

Comment: MM42 - LPMM18/5631  Respondent: Kathleen Grehan 10922689  Agent:

1. MM42 Land at Burnt Common, London Road, Send, Policy A58

Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

See all my objections above. This will also increase the heavy industrial traffic thus increase the diesel fumes and damage to the road surfaces.

Attached documents:

Comment: MM42 - LPMM18/5639  Respondent: Kathleen Grehan 10922689  Agent:

1. MM27 MM41 MM42 and MM48 Transport Strategy
Changes in the various transport strategies will in no way solve the problem of the increased traffic that will be produced by all the planned developments. It is more likely to make the situation worse.

It seems Send is getting far more than its fair share in this plan. Why is that? We have certainly submitted plenty of objections to the Local Plan at the various stages but it seems to have no effect. I have lost all faith in the planning process. If the burden was shared out more fairly the traffic problem would be diluted.

Attached documents:

Comment: MM44 - LPMM18/5633  Respondent: Kathleen Grehan 10922689  Agent:

1. MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

New site for 120 homes including some self-build

I repeat all my objections under MM41.

Attached documents:

Comment: MM48 - LPMM18/5640  Respondent: Kathleen Grehan 10922689  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

Changes in the various transport strategies will in no way solve the problem of the increased traffic that will be produced by all the planned developments. It is more likely to make the situation worse.

It seems Send is getting far more than its fair share in this plan. Why is that? We have certainly submitted plenty of objections to the Local Plan at the various stages but it seems to have no effect. I have lost all faith in the planning process. If the burden was shared out more fairly the traffic problem would be diluted.

Attached documents:

Comment: MM9 - LPMM18/5636  Respondent: Kathleen Grehan 10922689  Agent:

1. MM9 Green Belt Policy

The modifications claim to protect the Green Belt. I cannot understand how these modifications can claim to protect the Green Belt. They will just result in the Green Belt disappearing over time as the boundaries of the village increase.

Attached documents:

Comment: MM2 - LPMM18/2640  Respondent: AA Bailey 10924001  Agent:
Representations on the main modifications published in September 2018

I begin by saying that I agree with everything written by Ockham Parish Council and Wisley Action Group. I also point out that I OBJECT to the modifications and my reasons are presented below.

I wish to point out that a general difficulty with the modifications is that no justification is put forward as to why the modification has to be made. A **main modification** may only be made if the **plan as submitted** is unsound and the modification is required to make it sound. It is not apparent why most of the modifications might be thought to be required to address a soundness failure, let alone to evaluate whether they are.

**MM2**

The housing requirement should be calculated from the starting point of the latest, September 2018, ONS projections rather than the projections released earlier in 2018. These reduce the net increase in households on those projections from 420 per annum to 325 per annum.

The housing requirement figures should therefore be adjusted downwards.

This reduces the case for Green Belt releases and there are not the exceptional circumstances which are necessary to support all of the sites. Fewer Green Belt sites ought therefore to be released, with the **unsustainable site of Former Wisley Airfield/Three Farm Meadows (FWA/TFM) the first to go.**

We note that the Inspector has sought the Council's views on those ONS figures (1D/10), but given their significance ought to be asking the examination participants more generally for their views.

**MM2 - 4.1.11**

The revised housing trajectory projects the first homes coming from FWA/TFM in **2022/23.** However, the M25 Junction 10 works are said to need to be completed before any units can be occupied at the site. Given the delays to the Junction 10 project, the trajectory is unrealistically optimistic. The start date for commencement of works on J10/M25 roundabout has been pushed back to begin **late 2021** with a **completion date to be confirmed!**

Site A35 FWA/TFM is **highly unlikely** to make any contribution to the five year supply.

**Attached documents:**

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**Comment:** MM23 - LPMM18/2642  **Respondent:** AA Bailey 10924001  **Agent:**

**MM23 D1**

**Removal of unsustainability expectations**

The important expectations on developments of 25 dwellings or more in D1(2) are **removed without any justification.** The submitted text provided a series of requirements which met the social dimension of sustainable development in national policy. As submitted, **the text is sound and so cannot be changed at this stage.**

The replacement text is less precise, for example, on community interaction, walking distances, active lifestyles, routes to nearby areas for pedestrians and cyclists.

**MM23 D1 para13-15**

**Masterplan for Former Wisley Airfield (FWA/TFM)**
The masterplans proposed suffer from **two main defects:**

(i) They are produced by and approved by the developer. They do not have the status of supplementary planning documents or other local development documents are not approved by the local planning authority. If the Council does not agree with them, it can do nothing. Notwithstanding that, para 17 requires planning applications to be consistent with the masterplans, so in those respects is determining the acceptability of the developer's own application on its compliance with the developer's own masterplan. That is allowing the developer to mark his own homework.

**Developers can get master planning very badly wrong, as the FWA/TFM appeal decision demonstrated.**

(ii) The masterplans are required to respond to very vague criteria in para 16. Those are much less precise and useful than the expectations in the submitted D1(2). **Almost any scheme could, in a developer's eyes, meet para 16, even if it was a failure.**

37 D4

Deletion

**The submitted policy D4 is sound** and there is no rational basis upon which it could be unsound. No amendment is therefore justified.

Whilst some elements are incorportated into the main modifications for D1, other details such as (1)(d)'e street patterns, spaces around buildings, layout, grain, scale, massing, proportions, height and materials of surrounding buildings' are omitted from the proposed text

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM40 - LPMM18/2643</th>
<th>Respondent: AA Bailey</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Site Specific A35 FWA/TFM</strong></td>
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53 MM40

Quality requirements for FWA

Apart from the wastewater requirements, **the changes lack any rationale or benefit.** The condition of the SNCI will be **inevitably compromised by the development itself.** Moving references to unique places and unique context from opportunities to requirements is no doubt intended to strength the expectations but involves turning a very vague expectation into a similarly vague requirement.

**Attached documents:**

<table>
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<tr>
<th>Comment: MM50 - LPMM18/2644</th>
<th>Respondent: AA Bailey</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>60 MM47</td>
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<tr>
<td>Map Amending SNCI Former Wisley Airfield/Three Farm Meadows (FWA/TFM)</td>
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</table>
The amendment drastically reduces the size of the site of nature conservation importance at the FWA/TFM. However, the ecological interest of the land still merits SNCI designation. The published SNCI designation is sound and there is no justification for changing it.

The change appears to be to facilitate the new settlement. However, SNCI designation depends upon the merits of the land rather than desires to develop it. Policy ID4(6) sets out the test to be applied to weigh any benefits of a scheme against the harm to a SNCI. It is not there to be bypassed by the removal of SNCI designations because land is allocated for development or SANG.

- The addition of land to the south of FWA/TFM does not mitigate the density issue with the site as much of the new land is constrained by the VOR which prevents construction within a certain radius. There is currently a no set date by the CAA for this aviation beacon to be moved.
- Land to the south abuts the Ockham Conservation area and increases the visibility of the land to/from the Surrey Hill AONB.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed - in breach of case law.

The removal of Site A35 would deal with a number of these issues.

I trust you take into considerations the issues highlighted in my letter as the soundness of your Local Plan depend on you satisfactorily addressing these issues.

Attached documents:

Comment: MM9 - LPMM18/2641  
Respondent: AA Bailey 10924001  
Agent: 

MM9

The modification is a weakening of the protection of the countryside, changing the site being 'as a matter of fact within the village' to 'should be considered to be'. The new text has a prospective element to it - how the village ought in the future to be perceived rather than how it presently is.

In the context of a very diffused settlement such as Ockham, it is difficult to identify what is within the village at present, let alone what should be considered to be. The proposed modification would bring an uncertain, but potentially large, area into possible 'infill' development.

The Sustainability Appraisal Report Addendum asserts that there is 'a considerable re-write of the policy; however, this is presentational, i.e. there is no change in policy approach' (para 9.11.3). Firstly, there is a change in the policy and either way the current text is not unsound. A presentational re-write cannot be addressing a failure of a plan to be sound.

Attached documents:

Comment: MM27 - LPMM18/1943  
Respondent: Ms Victoria French 10924161  
Agent: 

If all these plans come to fruition, the cumulative effect of the proposed A3 Guildford scheme and the A3/M25 interchange plus over development of local villages and infilling the Green Belt will irreversibly change the character of this area, increase noise pollution, degrade air quality and cause delays and gridlock for years to come. In short, it will completely ruin this part of Surrey.
<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/746</th>
<th>Respondent: Ms Victoria French 10924161</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>The number of houses is excessive and unsustainable given the local infrastructure and amenities. A development of this size will permanently damage the landscape, including ancient woodland and Green Belt. It will turn a semi-rural location, already struggling to cope with the demands of increased traffic, into a suburbia blighted by gridlock on the feeder roads. The mental and physical health of residents will be under threat from the density of the proposed development and increased pollution in terms of air quality.</td>
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<th>Comment: MM41 - LPMM18/1951</th>
<th>Respondent: Ms Victoria French 10924161</th>
<th>Agent:</th>
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<tr>
<td>The proposed transport strategy to support the overdevelopment of land at Garlick's Arch, Send and Clockbarn, are not only inadequate to relieve the projected increase in car journeys in these areas but will also adversely effect Clandon and Ripley.</td>
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<th>Comment: MM42 - LPMM18/1952</th>
<th>Respondent: Ms Victoria French 10924161</th>
<th>Agent:</th>
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<tr>
<td>(0c) What exactly are these mitigation schemes, who will maintain them and how will the reversal of 'adverse material impacts on communities and the environments' be measured? Will the contribution increase proportionately if more of the site (3) is developed? How will this be enforced, and, over such a long period of time, how can residents be sure they will actually get anything very much in return for potentially excessive expansion of this site?</td>
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<tbody>
<tr>
<td>The scale of the proposed developments represents a 45% increase in the number of dwellings in Send. The lack of viable public transport options will inevitably lead to more congestion on the local roads. This, together with the loss of Green Belt, deterioration of air quality and visual blight on the heritage buildings at Send Marsh Green would be an unacceptable degradation to the way of life of the existing residents. There are no special circumstances that warrant building on the Green Belt, an action that will deprive citizens of this amenity for generations to come, and represent yet another threat to Surrey's wildlife.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Attached documents:
Comment: MM9 - LPMM18/1934  Respondent: Ms Victoria French 10924161  Agent:

The definitions and reasoned justification relating to Limited Infilling completely negate the policy paragraphs 1-4. These proposed modifications are not fit for the purpose of protecting the Green Belt. Far from reassuring residents that the villages mentioned will not be over developed, they pave the way for endless objections and court hearings in an effort to protect the clean air and amenity value of their local green spaces. This is extremely costly, onerous and stressful. Taxpayers and residents deserve better defence against this threatened encroachment.

Attached documents:

Comment: MM27 - LPMM18/1543  Respondent: Benedict Phillips 10924193  Agent:

I am writing to object strongly to some of the main modifications to Guildford's local plan.

I live on Send Road and will be hugely adversely affected by the massive growth in traffic on a road that is already too busy. The big increase in houses at Garlick's Arch (MM41), the doubling in size of the Burnt Common industrial estate (MM42), the Alderton's Farm housing development (MM44) and the Clandon A3 slip road (MM27, MM42, MM48) will combine to put intolerable pressure on Send Road. This will result in increased noise, delays and gridlock, not to mention the extra pollution which is a major health concern for those living on the road. In particular, the industrial estate is bound to increase HGV traffic on Send Road, which poses a major safety risk to young children. The 30mph limit is not usually adhered to and there are no speed cameras on the road or any traffic-slowing devices.

Furthermore, the Garlick's Arch housing development (MM41) is now increased by 150 houses. This is excessive and ignores the 7,000 objections to the original, smaller plans. This land is Green Belt land and ancient woodland. This will be lost while at the same time morphing Send and Ripley into one big sprawling mass of houses. Surely the whole point of the Green Belt is to stop this happening? The extra population will also put intolerable pressure on local schools and medical facilities - particularly after the council's recent decision to close Ripley Primary School in extremely dubious circumstances, which attracted negative coverage in the national press.

As far as the industrial estate at Burnt Common is concerned, the doubling of the size to 14,800 sq m seems a total insult to all those who objected to previous incarnations of the local plan. There is no need to put new industrial sites in the Green Belt when Slyfield has unused capacity. There are no special circumstances so it goes against your own Green Belt policy (MM9). There is already a 25% increase in the Send Business Centre, while the huge new Vision Engineering factory and the fact that the old factory is being kept as a commercial property despite residents being told it would become housing, all combines to fundamentally change the nature of Send by massively increasing the amount of industrial and commercial activity.

And why has the Alderton's Farm housing development reappeared in the latest local plan? It is Green Belt with no special circumstances so again contravenes your own rule MM9. There is already 770 houses added to the current 1,700 in Send. That is an unnecessarily high increase which is unfair on the people who live in Send already.

Moreover, the wording of the MM9 policy on the Green Belt seems to leave open the possibility of more 'infilling' of any land left that hasn't been developed.

It is staggering that after all the complaints, Guildford Borough Council has come back with these modifications.

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**Comment: MM41 - LPMM18/1540  Respondent: Benedict Phillips 10924193   Agent:**

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Attached documents:

**Comment:** MM48 - LPMM18/1545  **Respondent:** Benedict Phillips 10924193  **Agent:**

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Comment: MM9 - LPMM18/1546  Respondent: Benedict Phillips 10924193  Agent:

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It is staggering that after all the complaints, Guildford Borough Council has come back with these modifications.

Attached documents:

Comment: MM41 - LPMM18/4886  Respondent: Mrs Tammy Derrick 10925281  Agent:

I am writing to object, yet again! To the ridiculous proposals within the Send area. I have been a resident of Send for 13 years and have seen the increase in traffic within the village and the lane I live in, the pressures on our facilities and the effect on the Green Belt.

Attached documents:

Comment: MM41 - LPMM18/4888  Respondent: Mrs Tammy Derrick 10925281  Agent:
MM41 Land at Garlicks Arch

The area is within the Green Belt and I strongly object to the proposal of up to 550 new homes being built. With that comes the extra traffic, some estimated 800 extra cars on small residential roads and causing congestion in adjacent roads. Our services such as schools, doctors surgery are already strained and I do not feel can adequately support these extra people.

Attached documents:

Comment: MM42 - LPMM18/4889  Respondent: Mrs Tammy Derrick 10925281  Agent:

MM42 Land at Burntcommon

This is the largest new industrial allocation in the borough, there is no need to put it with the Green Belt when I believe Slyfield has the capacity and already existing infrastructure. The additional volumes of traffic, people and pollution in this residential area of Send will be unbelievable

Attached documents:

Comment: MM27 - LPMM18/6057  Respondent: Paul Dench 10926689  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The transport strategy will not compensate or eradicate the problem that will occur when you put so many new houses in one area rather than spreading them throughout the borough. E.g to make access north bound on the A3 is not going to solve any problems only create more as it will encourage more cars through the village from the Woking direction. To increase the number of houses by 45% in Send is a recipe for disaster unless far more though and planning is put into the infrastructure. This Local Plan does not address the problem of the already overloaded infrastructure.

Attached documents:

Comment: MM41 - LPMM18/6052  Respondent: Paul Dench 10926689  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Increased from 400 to 550 home

MM27 MM41 MM42 and MM48 Transport Strategy

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Comment: MM42 - LPMM18/6058  Respondent: Paul Dench 10926689  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

MM27 MM41 MM42 and MM48 Transport Strategy

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Comment: MM44 - LPMM18/6054  Respondent: Paul Dench 10926689  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

New site for 120 homes including some self-build

It is my opinion that the above three modifications to increase even more the already high number of developments will create huge problem to the already overstretched infrastructure, the roads, the school and the medical facilities. The roads in particular are totally unsuitable to take a greater load of traffic. I was born and brought up in Send and have lived most of my life on Send Road. I have seen the amount of traffic build up gradually. Now the long traffic jams on the road outside my house are common place. Often the village is gridlocked. It only takes a hold up such as traffic lights in Old Woking or congestion on the A3/M25 for the village traffic to grind to a halt with cars exhaust fumes filling the air.

In addition all these developments/modification encroach on to the Green Belt but this seems not to be a concern of the planning department. So the Green Belt Policy counts for nothing.

Comment: MM48 - LPMM18/6055  Respondent: Paul Dench 10926689  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The transport strategy will not compensate or eradicate the problem that will occur when you put so many new houses in one area rather than spreading them throughout the borough. E.g to make access north bound on the A3 is not going to solve any problems only create more as it will encourage more cars through the village from the Woking direction. To increase the number of houses by 45% in Send is a recipe for disaster unless far more though and planning is put into the infrastructure. This Local Plan does not address the problem of the already overloaded infrastructure.
Comment: MM9 - LPMM18/6056  Respondent: Paul Dench 10926689  Agent:

MM9 Green Belt Policy

The claim that this will protect the Green Belt is vague and subjective. It will be abused to the advantage of those seeking to develop land regardless of whether it is Green Belt I don’t understand how ‘infilling outside the current settlement boundaries’ can happen. Infill means to place between not outside. I don’t believe that there is any protection for the Green Belt in this Local Plan just the exact opposite.

Comment: MM25 - LPMM18/914  Respondent: Esther and Adrian Parry 10933473  Agent:

For MM25 (Heritage Assets) we think the new wording is very vague and offers no guidance to protecting a heritage asset. We think the old wording was more specific and offers greater guidance and protection. There is also no mention of consulting and taking advice from appropriate heritage societies which would also be important.

Comment: MM6 - LPMM18/913  Respondent: Esther and Adrian Parry 10933473  Agent:

MM6, 4a: Relates to developers claiming they can't provide the required amount of affordable housing because it would not be economically viable used to state 'may consider the following to assist with delivering a scheme' and now says 'will'. We feel strongly that it should revert back to the original wording "may" as this enables the Council to achieve more affordable housing. Developers are already pushing these boundaries without making it even easier for them. There is no need to change this wording.

Comment: MM41 - LPMM18/1369  Respondent: R Ebdon 10933569  Agent:

There have been more than 7000 objections to this proposal already, which have been totally ignored. I believe the original proposal to put 400 houses here is excessive, however you are now proposing to increase this by 37%, to 550 houses. This is utterly disproportionate for the infrastructure and services available in Send village.

The local roads will not be able to cope with 800+ additional cars and the increase in Nitrogen Dioxide levels will be dangerously high. Send is already a rat-run to Woking, with heavy traffic running through the village's narrow roads at peak times. The additional traffic will cause gridlock, undue stress to residents and road users and dangerously high Nitrogen Dioxide levels.
The school and medical centre will be totally overwhelmed by the additional demand.

The location is also green belt with ancient woodland that should be protected.

Attached documents:

**Comment: MM42 - LPMM18/1372  Respondent: R Ebdon 10933569   Agent:**

This proposal was deleted from the 2014 plan but you have now reintroduced it and doubled the area impacted. This is an unnecessary industrial development in the green belt because Slyfield has unused capacity. There are no special circumstances and so it contradicts MM9. Send will have much higher concentration of business and industrial development compared to other villages in the borough, as there is also a 25% increase in Send Business Centre. However, there is no proven demand for this. The impact on surrounding roads, which are already gridlocked at peak times, will be unbearable for the local community.

Attached documents:

**Comment: MM44 - LPMM18/1380  Respondent: R Ebdon 10933569   Agent:**

This is a green belt site with no special circumstances and so contradicts MM9, and was removed from previous drafts of the local plan. There have already been considerable objections to having 120 new houses but these are now being ignored. The impact on the roads that run into and through Send will be significant, particularly as this is the main route into Woking and will also have to carry additional traffic from the other developments proposed for the village. These include (MM41) 550 houses at Garlic's Arch, 60 houses at Clockbarn, and 40 houses at Winds Ridge on Send Hill where I live.

For one village the totality of developments is a wholly unreasonable and untenable amount of expansion - it is increasing Send housing by 45%! The infrastructure and services of Send village will simply not be able to cope. The school and medical centre will not be able to accommodate this massive increase in demand. The roads are already jammed-up at peak times coping with school and work traffic passing through Send from the A3 to Woking. An additional 1000+ local cars using the roads is simply not feasible and will cause unbearable stress to residents unable to travel freely to and from their homes.

I am particularly concerned about the treacherous conditions that will be created for cyclists. Send Road is already a very scary road to cycle on given the volume of traffic at peak times and difficulty in passing cyclists safely. I am put-off cycling to work in Woking due to the dangers on the narrow already busy road, but additional traffic will mean that it is positively dangerous for local children and adults to cycle to school, local services, amenities and to work.

Attached documents:

**Comment: MM2 - LPMM18/3032  Respondent: Alan Brockbank 10938241   Agent:**

Policy S2
I am astonished to understand that at the Public Examination the figure for Guildford Borough housing need being used by the inspector was 789 per year. It has now emerged that the correct figure should be 431 per year. This needs re-examining.

Attached documents:

**Comment:** MM27 - LPMM18/3030  **Respondent:** Alan Brockbank 10938241  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications have not been adequately addressed

Attached documents:

**Comment:** MM41 - LPMM18/3027  **Respondent:** Alan Brockbank 10938241  **Agent:**

I am writing to object to the proposed over-development of Send.

MM41 Land at Garlicks Arch Policy A43

The proposed increase of 37% in the number of houses to be built is excessive and I object.

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications have not been adequately addressed

Attached documents:

**Comment:** MM42 - LPMM18/3028  **Respondent:** Alan Brockbank 10938241  **Agent:**

MM42 Land at Burnt Common Policy A58

This proposed large industrial site makes very little sense when access to the north-bound A3 will involve heavy vehicles having to travel through already congested Ripley. Why not use the existing nearby site of Slyfield? At the other end of the village near me we already have an industrial unit increasing in size. I've lost count of the numbers of trucks and lorries that sat navs bring down Tannery Lane.

I understand that there are no special circumstances so it also contradicts MM9. I object.

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications have not been adequately addressed

Attached documents:
**Comment: MM44 - LPMM18/3029  Respondent: Alan Brockbank 10938241  Agent:**

MM44 Land at Alderton's Farm Policy A63

This is a Green Belt site with no special circumstances so it contradicts policy MM9. The increase in total of proposed housing is excessive given our current infrastructure. I object.

**Attached documents:**

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**Comment: MM48 - LPMM18/3031  Respondent: Alan Brockbank 10938241  Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications have not been adequately addressed

**Attached documents:**

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**Comment: MM2 - LPMM18/5620  Respondent: Peter Clifford 10939841  Agent:**

The current draft of the Local Plan is unsound because:

1. The revised Housing Need figures mean that much proposed greenbelt development is no longer justified and the exceptional circumstances that are required as grounds to allow greenbelt development do not exist.
2. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
3. There is no policy dealing with urban areas beyond the town centre such as St Catherine's where we live
4. It is unacceptable that Guildford should consider having to accommodate housing which Woking claims not to be able to provide.

**Attached documents:**

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**Comment: MM2 - LPMM18/5801  Respondent: Peter Clifford 10939841  Agent:**

There is too much reliance on A3 improvements and they are beyond the Council's control.

Housing numbers should reflect the latest ONS figures and projections. The Public Hearings should be re-opened on this subject to allow re-examination.

**Attached documents:**

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**Comment: MM3 - LPMM18/5622  Respondent: Peter Clifford 10939841  Agent:**
3. Proper planning of the town centre would help to promote more relevant, sensitive development. The hastily-added section is based on pre-internet retail models and numbers.

There need to be height restrictions on any building including the Wey corridor as well as the town centre (Portsmouth Road, North Street etc).

**Attached documents:**

**Comment:** MM3 - LPMM18/5800  **Respondent:** Peter Clifford 10939841  **Agent:**

The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

The Town Centre Policy, S3, is thus inadequate and also does not address the infrastructure deficit.

**Attached documents:**

**Comment:** MM41 - LPMM18/5621  **Respondent:** Peter Clifford 10939841  **Agent:**

5. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control such as widening the A3, and therefore there is nothing to prevent major greenbelt development taking place, irrespective of the congestion.

**Attached documents:**

**Comment:** MM9 - LPMM18/5808  **Respondent:** Peter Clifford 10939841  **Agent:**

The grounds for green belt development are inadequate because of points 1 and 3 and do not represent "exceptional circumstances".

**Attached documents:**

**Comment:** MM2 - LPMM18/5845  **Respondent:** VJA and BJ Underhill and Burgess 10940417  **Agent:**

We should like the Inspector to re-open the examination and amend the Local Plan to take account of the latest ONS housing figures.

The figures in MM2 are no longer up to date and do not provide a sound basis for the Plan or justify such extensive Green Belt loss.
Also there is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table S2b out of date and MM3 inadequate and in need of re-examination.

The proposal to build on Blackwell Farm will remove valuable agricultural land when the country is trying to be more self-sufficient with its food supplies. Also there will be a huge increase in traffic on the A31 Hog's Back where vehicles are stationary in the rush hours. The effects of emissions from vehicles polluting the air can be seen in clouds rolling down the north side of the Hog's Back which is frequently affected by fog in the winter months.

Any development on Blackwell Farm will result in the removal of woodland which offsets pollution.

There will be an unsustainable increase in vehicles for the proposed properties and extension of The Surrey Research Park. It should be borne in mind planning requires an allowance of two vehicles per household.

Attached documents:

**Comment:** MM27 - LPMM18/302  **Respondent:** JN Boardman 10945793  **Agent:**


It is obvious that with the above policies & strategies are still reflecting directly from what has gone before; amending & increasing on the Local Planning Foot Print. These changes are shown in shaving bits off here and adding bits to there.

These amendments:

Still disregards all technical impacts on current & future structures. Most structures sit on a deep clay base which needs speculated ground water to function as a foundation base.

Tweaking weak infrastructures, no way puts in place any future proofed infrastructures.

Increasing these capacities will greatly increase all impacts on environment. Not all of which is yet to be fully understood or been considered.

Concreting over "Green Belt" is just not on, now or anytime in the future. We all complain about the forests in South America being cut down, along with plastic waste; this is no different.

The impact of such large developments, will swamp Send & all surrounding areas. If Wisley was a no no; then these proposals are doubly bad.

So what part of NO, does the current dominant political power not understand?

It seems as if the first judgement, common sense (Wisley) went against the current political-monied power houses. How strange that with a new judge conforms now to their wishes. How did all this happen?

Stop faffing about! Ask the local populous "What they want to happen by holding a Local Referendum." Just like Switzerland.

Attached documents:

**Comment:** MM41 - LPMM18/299  **Respondent:** JN Boardman 10945793  **Agent:**

It is obvious that with the above policies & strategies are still reflecting directly from what has gone before; amending & increasing on the Local Planning Foot Print. These changes are shown in shaving bits off here and adding bits to there.

These amendments: -

Still disregards all technical impacts on current & future structures. Most structures sit on a deep clay base which needs peculated ground water to function as a foundation base.

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Attached documents:

Comment: MM42 - LPMM18/300  Respondent: JN Boardman 10945793  Agent:


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**Attached documents:**

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**Comment:** MM48 - LPMM18/303  **Respondent:** JN Boardman 10945793  **Agent:**


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**Attached documents:**

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**Comment:** MM9 - LPMM18/301  **Respondent:** JN Boardman 10945793  **Agent:**

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Stop faffing about! Ask the local populous "What they want to happen by holding a Local Referendum." Just like Switzerland.

Attached documents:

Comment: MM9 - LPMM18/6121  Respondent: Gillian Allen 10946721  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM27 - LPMM18/173  Respondent: Ivan Szabo-Toth 10949729  Agent:

MM27/MM41/MM41/MM48 Transport strategy. The combined traffic increase is not currently covered by the A3 changes and clandon slip roads. The levels of pollution and traffic will be unacceptable.

Attached documents:
### Comment: MM41 - LPMM18/169  
**Respondent:** Ivan Szabo-Toth 10949729  
**Agent:**

I would like to object to the following modifications that concern the area I live (Send Marsh):

1. **MM41. Garlicks Arch.** This is over-development in my opinion and is green belt land. An increase of 37% in the number of houses will block the roads in the area and create too much pressure on other local infrastructure.

**Attached documents:**

### Comment: MM41 - LPMM18/170  
**Respondent:** Ivan Szabo-Toth 10949729  
**Agent:**

**MM41: Burnt Common.** There is no need to put industrial sites in this area of Green Belt especially 14,800 sq m

**Attached documents:**

### Comment: MM41 - LPMM18/174  
**Respondent:** Ivan Szabo-Toth 10949729  
**Agent:**

**MM27/MM41/MM41/MM48 Transport strategy.** The combined traffic increase is not currently covered by the A3 changes and clandon slip roads. The levels of pollution and traffic will be unacceptable.

**Attached documents:**

### Comment: MM44 - LPMM18/171  
**Respondent:** Ivan Szabo-Toth 10949729  
**Agent:**

**MM44 Alderton’s Farm.** Again, green belt development putting pressure on local infrastructure it cannot cope with. 120 new homes are excessive and will ruin send marsh’s roads character.

**Attached documents:**

### Comment: MM48 - LPMM18/175  
**Respondent:** Ivan Szabo-Toth 10949729  
**Agent:**

**MM27/MM41/MM41/MM48 Transport strategy.** The combined traffic increase is not currently covered by the A3 changes and clandon slip roads. The levels of pollution and traffic will be unacceptable.

**Attached documents:**

### Comment: MM9 - LPMM18/172  
**Respondent:** Ivan Szabo-Toth 10949729  
**Agent:**
MM9 Green Belt policy. This is a subjective test and open to abuse and removes effective protection

Attached documents:

**Comment: MM2 - LPMM18/3598**  **Respondent: Alison Humberstone 10952161**  **Agent:**

Before I begin I have to question whether you should be looking for sites for new homes when you have one in the middle of Send and its yet to be developed despite it being a requirement of the permission to build their new factory. GBC should be ensuring agreements are met before even considering suggesting we need to release more land for development.

The Vision engineering site new building was agreed on the basis the old one was removed and houses built on the site. There appears to be absolutely no progress on that and GBC should be held to account for not protecting the village and ensuring developments are held to their agreements. It’s in fact ended up as another small industrial site in the village Why look to have sites for new houses when you have the site and allowed development based upon the building of houses and you don’t even pursue it? This infuriates me as you should be pursuing legal avenues with Vision to make them meet their agreements. How can GBC put forward requirements for more land when they don’t deal with the agreements they already have for new housing?

My initial objection is to : MM41, MM42, MM44, MM9, MM27.

**POLICY S2.**

The housing number predictions have been shown to be incorrect so this is all starting from a incorrect basis. The latest data makes a mockery of G.B.C consultants figures.

At the public examination the figure for Guildford.B.C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated.

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

Attached documents:

**Comment: MM27 - LPMM18/3615**  **Respondent: Alison Humberstone 10952161**  **Agent:**

MM27. MM41, MM42, and MM48 Transport Strategy

The effect of thousands more cars has not appear to have been properly taken into account? The A3 junction wont fix the issue of masses of traffic along A roads to Woking.
The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

**Comment:** MM41 - LPMM18/3618  **Respondent:** Alison Humberstone 10952161  **Agent:**

MM41 Land at Garlicks Arch, Send Marsh. Policy A43.

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years, an increase of 37% in the number of houses to be built and I can only assume that the Conservative Guildford Borough Council are punishing Send for throwing out the Conservative Councillors and electing Green Belt Councillors.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking.

This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

This site is contaminated by many years of Clay Pigeon Shooting and is prone to frequent flooding.

Up to a thousand cars and between 1600 to 1700 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

Why have over 7000 objections to the earlier plan not just been ignored but more houses etc added?

**MM27. MM41. MM42, and MM48 Transport Strategy**

The effect of thousands more cars has not appear to have been properly taken into account? The A3 junction wont fix the issue of masses of traffic along A roads to Woking.

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Attached documents:
Comment: MM42 - LPMM18/3599  Respondent: Alison Humberstone 10952161  Agent:

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POLICY S2.

The housing number predictions have been shown to be incorrect so this is all starting from an incorrect basis. The latest data makes a mockery of G.B.C consultants figures.

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The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

Attached documents:

Comment: MM42 - LPMM18/3619  Respondent: Alison Humberstone 10952161  Agent:

MM42. Land at Burnt Common, London road Send Policy A58.

There is no need for new industrial sites when Slyfield is has unused capacity. There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.

There is no need to put Industrial premises in our precious GREEN BELT, except if as a Council Cabinet you want to punish Send.

This plan has since been deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.

You don't seem to think the greenbelt being protected and available for future generations - you just want to take advantage and use it now.

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land why has again Send been picked on again to have the largest industrial allocation in any village in the Borough, is it politics?

This is a further increase of 25% making it a huge increase in Send, bigger than any other village.

Attached documents:

Comment: MM44 - LPMM18/3620  Respondent: Alison Humberstone 10952161  Agent:
MM44 Land at Aldertons Farm, Send Road, Policy A63.

Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY.

With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%

How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment.

Attached documents:

Comment: MM48 - LPMM18/3617  
Respondent: Alison Humberstone 10952161  
Agent: MM27, MM41, MM42, and MM48 Transport Strategy

The effect of thousands more cars has not appear to have been properly taken into account? The A3 junction wont fix the issue of masses of traffic along A roads to Woking.

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

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Attached documents:

Comment: MM9 - LPMM18/3603  
Respondent: Alison Humberstone 10952161  
Agent: My initial objection is to : MM41, MM42, MM44, MM9, MM27.

POLICY S2.

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The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

**MM9 GREEN BELT POLICY.**

The modifications claim to protect our precious GREEN BELT except in very special circumstances, clearly that is not true.

GBC make an exception for "LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE."

This is vague and benefits only those who wish to ignore the protection. It's a catch all statement which is completely subjective causing complete uncertainty and completely negates protecting the Green belt and simply means that any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish the above objections to be considered and this huge imposition of housing and commercial development to be largely abandoned as Send Village is at present at bursting point.

**Attached documents:**

**Comment:** MM2 - LPMM18/4481  **Respondent:** Charlotte Ladd 10953249  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   
   2.1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   
   2.2. There is too much reliance on A3 improvements and these are beyond the council’s control
   
   2.3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   
   2.4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   
   3.1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   
   3.2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high
In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the
Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

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**Comment:** MM23 - LPMM18/4484  **Respondent:** Charlotte Ladd 10953249  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

---

**Comment:** MM23 - LPMM18/4492  **Respondent:** Charlotte Ladd 10953249  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

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**Comment:** MM3 - LPMM18/4482  **Respondent:** Charlotte Ladd 10953249  **Agent:**
MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 - POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 - POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 - POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/4485  Respondent: Charlotte Ladd 10953249  Agent: 

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4486  Respondent: Charlotte Ladd 10953249  Agent: 

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4488  Respondent: Charlotte Ladd 10953249  Agent: 

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM35 - LPMM18/4489</th>
<th>Respondent: Charlotte Ladd 10953249</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM35 <strong>Gosden Hill Farm</strong> should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.</td>
<td></td>
<td></td>
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<th>Respondent: Charlotte Ladd 10953249</th>
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<th>Respondent: Anita Wilkinson 10954209</th>
<th>Agent:</th>
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MM2: Please consider revising the target for new build in line with updated figures of housing requirement which, it may be argued, could be fulfilled by the re-use of brownfield sites and perhaps re-designation to residential use of former retail sites. Physical retail sites no longer reflect the pattern of consumer behaviour, those present of the high street are experiencing a downturn due to the unrelenting change in consumer purchasing behaviour. Reducing the projected figures (MM13) could free up town sites, this would help to minimise the impact of building on the green belt.

Attached documents:

Comment: MM41 - LPMM18/3801  Respondent: Anita Wilkinson 10954209  Agent:

MM41 – there appears to be an act of faith that the A3 will in someway accommodate the transport impact which will ensue from the overdevelopment planned, for example. for Garlicks Arch and Aldertons Farm, despite the council having no control over transport strategy.

Attached documents:

Comment: MM50 - LPMM18/3802  Respondent: Anita Wilkinson 10954209  Agent:

MM47 – the gradual reduction in the size of the SNCI will impact on biodiversity, a more coherent view needs to be taken taking into account how flora and fauna use the habitats and link habitats together, which is why the appropriate Habitats Regulation Assessment needs to be taken and attended to.

I would request that my comments be paid due regard.

Attached documents:

Comment: MM9 - LPMM18/3800  Respondent: Anita Wilkinson 10954209  Agent:

MM9 a reduction in targets would also reduce the need for infilling which in turn weakens the protection of the countryside.

Attached documents:

Comment: MM2 - LPMM18/1251  Respondent: Pete Rollo 10954913  Agent:

In the light of the latest ONS housing figures I would urge you to reopen the examination and amend the Local Plan.

The figures in MM2 are no longer up to date as ONS housing figures have dropped considerably. They do not provide a sound basis for the Plan justify such extensive Green Belt loss.

There is a strong case for taking out a strategic site.
There is more scope for town centre provision.

This makes table S2b out of date and MM3 inadequate and in need of reexamination.

I urge you to take account of the current data.

Attached documents:

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**Comment:** MM23 - LPMM18/1956  **Respondent:** Mr Christopher Parker 10955713  **Agent:**

This comment relates to MM23

MM23 (15) introduces the requirement for Developers of Strategic Sites to produce Masterplans and states that "**the master planning process shall engage with the local community**". It is essential that MM23 (15) also states who will set and independently validate the parameters and outcomes of this very important engagement process with the local community. If the engagement process is not managed competently and with integrity the goodwill and faith of the local community will be lost.

MM23 (16) lists various criteria that Developers must address in formulating their Masterplans. Conspicuous by its absence from the list is any specific mention or reference to a cohesive 'transport infrastructure'. At the very outset of the local planning process GBC made it clear in the Draft Local Plan published in 2014 that **appropriate infrastructure is central to Guildford's continuing prosperity** (para 2.15) and that **ensuring the Borough will have a strong infrastructure is at the very top of visionary ambitions for Guildford** (para. 3.2). So, at the very least, Developers should be required to identify in their Master Plans how the plans satisfy GBC ambitions in respect of transport infrastructure. Otherwise how can the local community engage meaningfully in the process?

Attached documents:

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**Comment:** MM23 - LPMM18/1962  **Respondent:** Mr Christopher Parker 10955713  **Agent:**

MM23 (16) lists various criteria that Developers must address in formulating their Masterplans. Conspicuous by its absence from the list is any specific mention or reference to a cohesive 'transport infrastructure'. At the very outset of the local planning process GBC made it clear in the Draft Local Plan published in 2014 that **appropriate infrastructure is central to Guildford's continuing prosperity** (para 2.15) and that **ensuring the Borough will have a strong infrastructure is at the very top of visionary ambitions for Guildford** (para. 3.2). So, at the very least, Developers should be required to identify in their Master Plans how the plans satisfy GBC ambitions in respect of transport infrastructure. Otherwise how can the local community engage meaningfully in the process?

Attached documents:

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**Comment:** MM35 - LPMM18/1961  **Respondent:** Mr Christopher Parker 10955713  **Agent:**

This comment relates to MM35
If the only new access junction to the A3 at Gosden Hill will be two way (i.e. on and off the southbound carriageway) as per MM35(1) then to avoid serious traffic congestion in both Burpham and Merrow it is self evident a connector road will at some stage be required to link the Gosden Hill site with the B2215 London Road/A247 Clandon Road (and thence the A3 northbound carriageway via the new on-slip proposed at Garlicks Arch). Therefore the two words "could potentially" in the final sentence of MM35(2) should be replaced with the single word "will" to ensure land is safeguarded for this purpose.

Attached documents:

Comment: MM35 - LPMM18/2075  Respondent: Mr Christopher Parker 10955713  Agent:

My Comment relates to MM35 - Transport Strategy.

It is self evident that the improved junction on the A3 described by MM23(1) will largely need to be in place at the beginning of the phased construction operations on site, to provide safe access to the site for heavy earth moving plant, construction equipment, materials, personnel and the provision of temporary works associated with large projects of this nature. Otherwise this heavy traffic will seriously overload and disrupt the already congested local Burpham and Merrow road systems. Clearly the Highways agencies will need to have capital resources in place if this is to be achieved in a timely fashion. This rational programme requirement should be made explicit within the transport strategy set out in MM23(1).

Attached documents:

Comment: MM35 - LPMM18/2078  Respondent: Mr Christopher Parker 10955713  Agent:

This comment relates to MM35 - Transport Strategy - (and it corrects the erroneous referencing in my previous comment on this subject)

It is self evident that the improved junction on the A3 described by MM35(1) will largely need to be in place at the beginning of the phased construction operations on site, to provide safe access to the site for heavy earth moving plant, construction equipment, materials, personnel and the provision of temporary works associated with large projects of this nature. Otherwise this heavy traffic will seriously overload and disrupt the already congested local Burpham and Merrow road systems. Clearly the Highways agencies will need to have capital resources in place if this is to be achieved in a timely fashion. This rational programme requirement should be made explicit within the transport strategy set out in MM35(1).

Attached documents:

Comment: MM2 - LPMM18/1861  Respondent: Aiden Clegg 10956833  Agent:

Regarding the modifications of GBC Local Plan, I would like to object very strongly to these modifications. Over the last few years I have repeatedly objected to the Local Plan in our area (in particular the inclusion of Three Farms Meadow as a strategic site) as being not suitable but, more importantly, not sustainable given the lack of a viable transport plan for such a large new town. Also the whole plan is based both on out of date ONS statistics, which justify a far higher target than is actually required, and a seemingly self imposed requirement to help fill Woking’s unmet needs (MM2).
Comment: MM41 - LPMM18/1872  Respondent: Aiden Clegg 10956833  Agent:

However, the key objection which should be of concern to all of Surrey, is regarding the transport strategy. MM41 - the transport strategy modelling, which is used by your plan, is inadequate. Specifically the fact that the delay in J10 of the M25 by Highways England RIS of at least two years will impact all development that relies on this scheme. In addition the fact that there is no suitable rail infrastructure with capacity and within a suitable distance of the site means that the site is wholly dependent on car transport. This will put too much traffic onto the already overcrowded local road network and is, by definition, unsustainable and dangerous. Given the issues with J10 of the M25, this will, in effect, put a congestion “stopper” in the top of Surrey. Moreover, I do not believe that the Highways England scheme to develop J10 will have any impact on the congestion levels as the issue lies not with the A3 but with the M25 - the M3/M25 junction has a similarly improved junction and the congestion there continues to be very severe.

Finally, I note that Strategic sites are to be exempt from design constraints. This will result in inappropriate developments such as that proposed on Three Farm Meadows. There is also no evidence that recent case law, such as “People over Wind” has been taken into account.

For all the above reasons I am calling for the hearing to be reopened, specifically so that Traffic issues can be properly assessed and the latest Office of National Statistics can be used. I would also like to advise that I support the representation made by WAG (Wisley Action Group), which was written with advice from Richard Harwood QC.

Attached documents:

Comment: MM50 - LPMM18/1865  Respondent: Aiden Clegg 10956833  Agent:

Regarding MM47, the size of the SNCI is drastically reduced, which is not acceptable and there is no justification for it. It will destroy the biodiversity of this area. I also understand that an Appropriate Assessment and a Habitats Regulation Assessment have not been completed which is a breach of case law.

Attached documents:

Comment: MM2 - LPMM18/5147  Respondent: Pauline Masters 10957025  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:
1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share
The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 -
potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:
1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt
The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.
The Council has long argued that much of the housing required must be built on such sites.
This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share
MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure e.g. excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained. Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.
MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

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**Comment: MM23 - LPMM18/5150  Respondent: Pauline Masters 10957025  Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be incompatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment: MM3 - LPMM18/5148  Respondent: Pauline Masters 10957025  Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

F. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development
across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5151  Respondent: Pauline Masters 10957025  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5152  Respondent: Pauline Masters 10957025  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5153  Respondent: Pauline Masters 10957025  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/5154  Respondent: Pauline Masters 10957025  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/5155  Respondent: Pauline Masters 10957025  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/5156  Respondent: Pauline Masters 10957025  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/5149  Respondent: Pauline Masters 10957025  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM27 - LPMM18/1029  Respondent: Christopher Hunter 10957441  Agent:

The traffic implications for Burnt Common and Garlick’s Arch have not been addressed by the A3 changes and the Clandon slip roads. I object to this transport strategy.

Attached documents:

Comment: MM41 - LPMM18/1026  Respondent: Christopher Hunter 10957441  Agent:

I object. This is too many homes for area and will ruin both villages in terms of traffic congestion, damaging environment and overcrowding local amenities.
Comment: MM42 - LPMM18/1027  Respondent: Christopher Hunter 10957441  Agent:

I object. There is insufficient demand for such large amount of industrial space.

slyfield has enough space.

there are no special circumstances and this goes against Green Belt Policy

Attached documents:

Comment: MM9 - LPMM18/1028  Respondent: Christopher Hunter 10957441  Agent:

I object to modifications- Green Belt will wrongly be removed from protection.

Attached documents:

Comment: MM40 - LPMM18/3523  Respondent: Brian Cooke 10958177  Agent:

I should like to object strongly to the plans to redevelop Wisley Airfield for many reasons.

I have not been advised of the latest plans by Guildford Borough Council.

I should like to call for the examination in public to be reopened so that the latest findings from the Office Of National Statistics can be used.

I have fully supported the representation by WAG which was written with advice from Richard Harwood QC.

In spite of the plans being rejected in the Summer by the Secretary of State, the Borough appears to be supporting the Developers.

I object to the impact such plans will have on road congestion, pollution, local historic villages, wildlife, car parks, high Streets, and doctors.

Attached documents:

Comment: MM45 - LPMM18/754  Respondent: Laura Bouncer 10959041  Agent:

I am writing to object to the above change to the Local Plan proposal of site - Policy A64: Land Between Glaziers Lane and Strawberry Farm, Flexford; for the following reasons:
1 - This is green belt area and adjacent to an area of outstanding natural beauty. If approved its development would fundamentally alter the importance of protection of our green belt for future generations, aside from visually impacting an area of outstanding natural beauty adjacent to it and highly visible from the top of the Hog’s Back.

2 - There are many brown field sites listed on the GBC web site. Whilst recognising that for developers these are not a cheap option’s v’s green belt land, surely repurposing brown belt land must come before the desecration of the green belt.

3 - Glaziers Lane is a narrow lane with an awkwardly angled railway bridge and sharp right hand bend that compromise the road width even further. Pedestrians need to cross the road several times along it's length as the pavement is only available on one side at a time. Such a development with all the additional traffic is going to increase the risk of a serious accident/death in the Lane. It’s important to note this is a Lane not a road, and any possible entrance exit to this site would be unsighted by traffic approaching from the South increasing this risk significantly, especially as at peak times people speed down the lane.

4 - Light pollution is currently very low in Glaziers Lane this development would increase this considerably with cars at night turning in and out of any access road, which will have a knock on impact on wildlife in the area.

5 - We currently have a thriving population of hedgehogs which do cross the Lane and increased traffic is highly likely to impact them directly, whilst not on any endangered list now there is serious concern over their future as they continue to disappear from our environment.

6 - There are a good number of mature oak trees in site A64, with all of the issues over the last couple of decades with disease we need to ensure their protection, not building here and so not impacting their environment will protect them.

7 - Pollution from vehicles and noise is also low in this part of Glaziers Lane, adding 105 houses would dramatically increase these pollutants, adding circa 200 plus cars to the area would be a significant impact on physical and mental health of all living in the area.

8 - People park in the lane especially if they have a larger number of visitors, with the current limited housing this is less of an issue but adding in so many more houses with limited parking will result in an increase in the occasions when people will park in Glaziers Lane and again increase the risk of accidents (as people always park as near as they can to where they want to be) coupled with the higher traffic volumes again especially important being so near the blind approach from the railway bridge.

9 - We are in an area of clay with a high water table, which the standing water after rain at all differing levels reinforces. Building more housing on this land, where there is currently a very large lake, clearly does not make sense.

10 - Assuming the plan will result in the lake being drained for houses to be built, this will result in the loss of the wildlife it supports. A survey will need to be carried out to ensure endangered species are not adversely affected. Also the lake possibly has a source of water into it that could causing risk of flooding.

11 - Sewage / general drainage is an issue in Glaziers Lane, is a significant issue in the Lane. Adding 105 houses will place a massive additional strain on an already challenged sewage system (the system has already collapsed twice in the last few years at the northern end of the Lane, and dip has started forming again recently so later this winter may see it collapsing again). All the additional lorries over a 3 year period to build these houses will massively accelerate this issue and the risk of damage to the road and the just renewed pavement.

12 - The lorries associated with Backhurst etc are already noticeable in that you can feel them in the house as they go by (sometimes at excessive speeds!!) The massive increase in such large vehicles is going to further damage the road and potentially cause structural issues to houses in the area. Also the buses and lorries that currently come down the Lane, which is D rated, find it very difficult to stay on their side of the Lane as it is narrow plus are unable to turn in and stay on the correct side of the road, which is extremely dangerous to other road users including pedestrians.

Attached documents:
Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
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In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

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I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

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I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.
The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
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11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

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The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

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**MM2** Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/2584  **Respondent:** Inger & Ron Ward 10959265  **Agent:**

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**MM23** should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.
MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

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Attached documents:

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**Attached documents:**

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**Attached documents:**

**Comment:** MM44 - LPMM18/2590  **Respondent:** Inger & Ron Ward 10959265  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

**Comment:** MM2 - LPMM18/1023  **Respondent:** Mr Brian Benton 10959297  **Agent:**
In September the ONS released new figures therefore the public examination must be recalled to look again at numbers & sites

Attached documents:

**Comment:** MM3 - LPMM18/1022  **Respondent:** Mr Brian Benton 10959297  **Agent:**

MM3 Add more residential in the town centre as retail has declined.

Attached documents:

**Comment:** MM35 - LPMM18/1025  **Respondent:** Mr Brian Benton 10959297  **Agent:**

MM35 Sustainable Movement Corridor. The traffic chaos due to Aldi already makes the Burpham roundabout a danger to cyclists & pedestrians. The roads are not wide enough for more bus & cycle lanes.

Our bus service has been cut due to congestion, more traffic will mean more cuts.

All infrastructure must be part of and in place before development.

Attached documents:

**Comment:** MM13 - LPMM18/5657  **Respondent:** Jan Lofthouse 10959425  **Agent:**

MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

**Comment:** MM2 - LPMM18/5655  **Respondent:** Jan Lofthouse 10959425  **Agent:**

OBJECTION TO MODIFICATIONS TO DRAFT LOCAL PLAN

I concur with the objections to this local plan modification made by Wisley Action Group and by Ockham Parish Council

I consider that there should be a new hearing – it must be re-opened as so much has changed

Housing numbers have changed

[text redacted: the text included a quote that was not wholly accurate]
The strategic sites should be modified

Please remove the Former Wisley Airfield, now Three Farm Meadows as a strategic site

As G B C is aware, this is simply not suitable as a major housing development and needs to be deleted as a strategic site

This planning application was indeed turned down by G B C over a year ago on 14 major planning grounds, so how could G B C keep it in the Local Plan as a strategic site?!

The Planning Inspector turned down the appeal by Wisley Property Investments Limited, so how can G B C still include this site in its Local Plan as a strategic site?!

No notice has been taken of important case law to include People v Wind

I concur with all Ockham Parish Council has objected to as well

Specifically please see below as follows

MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.

The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/5659  Respondent: Jan Lofthouse 10959425  Agent:

MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – (this makes it easier for developers)

Strategic sites are to be exempt from design constraints (which will result in developments such as that proposed on Three Farm Meadows)

There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/5660  Respondent: Jan Lofthouse 10959425  Agent:

S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:
**Comment: MM40 - LPMM18/5661**  **Respondent:** Jan Lofthouse 10959425  **Agent:**

**SITE SPECIFIC – A35 – Three Farms Meadows**

The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR (the air traffic control beacon which prevents construction within a certain radius)

Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB

**Attached documents:**

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**Comment: MM40 - LPMM18/5662**  **Respondent:** Jan Lofthouse 10959425  **Agent:**

MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

**Attached documents:**

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**Comment: MM41 - LPMM18/5658**  **Respondent:** Jan Lofthouse 10959425  **Agent:**

MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].

There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

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**Comment: MM9 - LPMM18/5656**  **Respondent:** Jan Lofthouse 10959425  **Agent:**

MM9 – infilling in and around villages will result in the weakening of protection of the countryside

**Attached documents:**

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**Comment: MM2 - LPMM18/3901**  **Respondent:** Martin Ladd 10962689  **Agent:**

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Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
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Comment: MM44 - LPMM18/3910  Respondent: Martin Ladd 10962689  Agent:

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Attached documents:
Comment: MM9 - LPMM18/3903  Respondent: Martin Ladd 10962689  Agent: 

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM13 - LPMM18/3533  Respondent: Gabrielle Erhardt 10963137  Agent: 

4. MM13 There is too much retail space proposed, this must be based on out of date information.

Attached documents:

Comment: MM2 - LPMM18/3529  Respondent: Gabrielle Erhardt 10963137  Agent: 

The Local Plan is Unsound

I would suggest that the Local Plan is unsound because of the following and should be re-examined:

1. MM2. The latest ONS figures and projections make the proposed housing number invalid, as a result the public hearings should be reopened, and the figures re-evaluated. The same would go for Woking and result in a far lower figure, however there should no requirement for Guildford to take on the unmet numbers from Woking.

2. There are many brownfield Sites in the centre of Guildford that have not been considered or used efficiently. This has resulted in the proposed development of far too much green belt and should not be approved.

Attached documents:

Comment: MM23 - LPMM18/3534  Respondent: Gabrielle Erhardt 10963137  Agent: 

5. MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority

Attached documents:

Comment: MM3 - LPMM18/3532  Respondent: Gabrielle Erhardt 10963137  Agent: 

Problems with the Main Modified Plan

1. MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
<table>
<thead>
<tr>
<th>Comment: MM40 - LPMM18/3535</th>
<th>Respondent: Gabrielle Erhardt 10963137</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Local problems</strong></td>
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<tr>
<td>MM40 Wisley should be retained as Green Belt and removed from the Plan. Revised housing figures weaken the justification for development. All the reasons it was turned down by the inspector are still valid.</td>
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<th>Comment: MM41 - LPMM18/3531</th>
<th>Respondent: Gabrielle Erhardt 10963137</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>4</td>
<td>There are no guarantees regarding the improvements to the A3 which is critical to the developments.</td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment: MM41 - LPMM18/3537</th>
<th>Respondent: Gabrielle Erhardt 10963137</th>
<th>Agent:</th>
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<tr>
<td>Similarly MM41 Garlick’s Arch should be retained as Green Belt in view of revised housing need rather than being expanded. I hope that these points are taken into consideration.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM9 - LPMM18/3530</th>
<th>Respondent: Gabrielle Erhardt 10963137</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>3</td>
<td>The exceptional circumstances to develop the green belt do not add up and should be re-examined.</td>
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<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
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</tbody>
</table>
Comment: MM2 - LPMM18/1274  Respondent: Susan Poole 10963233  Agent:

I am writing in with my comments on the recent amendments to the Draft Local Plan as I disagree with certain aspects of it.

MM2 Policy S2 Planning for the Borough – our spatial development strategy

The Office for National Statistics has produced new lower population and household figures for Guildford, so we don’t need to build as many houses as originally quoted in the plan. I therefore request that the Inspector re-open the examination and amend the Plan to take account of the new lower figures as the previous ones do not justify such extensive Green Belt loss.

Para 4.1.9ab Currently, there is only a sewer capacity for about 325 homes in Burpham. This is insufficient for the proposed housing number of 672 homes per annum in the Draft plan let alone the total over the plan period. Thames Water has advised that for the period 2020-2025 there isn’t any financial provision to update Guildford’s capacity. This renders the Local Plan unsound.

Attached documents:

Comment: MM3 - LPMM18/1275  Respondent: Susan Poole 10963233  Agent:

MM3 Policy S3 Delivery of development and regeneration within Guildford Town Centre

I feel the “Town Centre first” approach on the plan should be more prominent and more houses built within the Town. With the reduction in retail outlet requirements, there must be capacity for more houses in the town centre especially with the amount of re-development going on. How can the Green Belt incursions be justified if the residential potential in the urban area is not realised?

Transport strategy and other infrastructure.

The Sustainable Movement Corridor won’t work. The A3100 London Road through Burpham is not wide enough to have additional bus and cycle lanes. This road is already too congested since Aldi was built, any additional traffic on top of that will create gridlock in Burpham on even more occasions.

Local bus services have already been cut because of traffic congestion on Burpham’s roads so the suggestion of new bus services on even more congested roads doesn’t make sense.

The volume of traffic means we are now having an issue with pollution and making the roads a very dangerous place for pedestrians and cyclists. There are a lot of children who walk and cycle to school in Burpham. I don’t feel we should make their journey any more dangerous.

Please could these issues be properly addressed.

Attached documents:

Comment: MM41 - LPMM18/4743  Respondent: Liam Doyle 10966977  Agent:

MM41 - Land at Garlicas Arch, Send Marsh, policy A43
I **object** to this on the following grounds;

- This is Green Belt land
- proposed new development is excessive
- it will destroy the ancient woodland at the site
- Will further add to the existing flooding issue
- Extra cars will block up the existing busy roads
- Impact the already strained local services such as schools and medical facilities

**Attached documents:**

**Comment:** MM42 - LPMM18/4677  **Respondent:** Liam Doyle 10966977  **Agent:**

MM42 - Land at Burnt Common, London Road, Send, policy A58

I **object** to this on the following grounds;

- No need for new industrial site when extra capacity at Slyfield is not used
- Area has doubled from previous expansion proposals
- Will result in already busy narrow local roads being further gridlocked

**Attached documents:**

**Comment:** MM44 - LPMM18/4678  **Respondent:** Liam Doyle 10966977  **Agent:**

MM44 - Land at Alderton’s Farm, Send Marsh Road, policy A63

I **object** to this on the following grounds;

- This is Green Belt land
- The additional traffic together with other proposed developments will further gridlock crossroad
- The existing poor drainage and flooding of local gardens will worsen
- With other locally proposed new development, this will result in a 45% increase to Send, for a small village this is too high
- Extra cars will block up the existing busy roads
- Impact the already strained local services such as schools and medical facilities

**Attached documents:**

**Comment:** MM9 - LPMM18/4679  **Respondent:** Liam Doyle 10966977  **Agent:**

MM9 - Green Belt policy

I **object** to this on the following grounds;
Any modifications to definition of Green Belt should be done following a parliamentary review.

Attached documents:

Comment: MM41 - LPMM18/4696  Respondent: Jenny Jackson 10967489  Agent:

MM41 Garlicks Arch proposed development (Policy A43)

I write to OBJECT to the updated proposals for development in the area referred to as Garlicks Arch in the current version of the Plan. The proposed increase in housing provision from 400 to 550 following massive (7000) written public objections to the former proposal, represents an increase in housing on this site by 37%.

This area falls within the Green Belt (MM9). The area identified within the development proposals is described by the Ordnance Survey as surrounded by ‘Garlicks Arch Copse’ – further described as woodland. On closer scrutiny, much of the land contains ancient woodland and will in reality serve to join the villages of Send and Ripley, neither of which require a housing estate of this magnitude.

It is also evident from this proposal that there is no plan to accommodate additional infrastructure to the area, at a time when schools are unable to accommodate children who already live within the catchment areas, and both GP provision and hospital services are working under pressure throughout the year.

The impact on local roads is unimaginable. Already in an attempt to avoid congestion in the approach from Send to Ripley and vice versa, local side roads – many of which are single track without pavements, and are already subjected to freight trucks, tankers and public transport (in addition to cars) trying to avoid Junction 10 congestion. Local residential roads become ‘rat runs’ through Pyrford, Ripley, Send and Ockham, as commuter seek short cuts between Junction 11 and Junction 9 on the M25. The addition of 800 plus vehicles should this development proceed, will place an unnecessary burden and pressure on existing commuters and residents, many of whom use them for cycling and as pedestrians.

Attached documents:

Comment: MM42 - LPMM18/4697  Respondent: Jenny Jackson 10967489  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

I further OBJECT to these proposals. This part of the Plan increases the originally proposed 7000, to a minimum of 14,800 square meters of land to be used for industrial and storage and I would remind Councillors, that they actually withdrew and thereby deleted it from the 2014 plan – the effect is to more than double the area originally proposed. This is now by far the largest new industrial allocation in any village in the borough and is completely unnecessary as Slyfield currently has under-utilised capacity. Furthermore, there are NO special circumstances to warrant placing units such as these into Green Belt land. Work underpinning the Employment Land Needs Assessment actually showed a reduction in demand for industrial land. When added to increased capacity of 25% at Send Business Centre, means there is a much bigger concentration of industrial capacity in Send than in any other village - with no proven demand. Councillors spent happy times sitting in gridlocked traffic within short term memory when viewing the proposals at the former Wisley Airfield – the increases in traffic attempting to use already gridlocked roads if approval is given to this proposal is inconceivable and will serve to push the council into a situation whereby they actually increase health risks to road users and residents by increasing levels of existing and proven nitrogen dioxide toxicity.

Once again, this breaches MM9 – without justification. To attempt to introduce such changes introduces a test on which no one can reasonably understand as it is purely subjective. The effect would leave the Council open to criticism that such
a subjective test is put in place in order to achieve the aims of the Council without respecting the views of local people or indeed experts. If breaches to the Green Belt are permitted (even where proven unnecessary), this sets a dangerous precedent for future developments.

Attached documents:

Comment: MM9 - LPMM18/4694  
Respondent: Jenny Jackson  
Agent:  

MM9 Green Belt Policy

The Green Belt in this area was so named in order to provide ‘breathing lungs’ around the very necessary major developments in London, following the Second World War.

The so called ‘modifications’ to the Plan claim to protect the Green Belt with the apparent exception of claiming to limit the development to areas which could be believed to be within the ‘settlement boundaries of the villages of Ripley and Send’. This area does not fulfil this criteria. The so called ‘development areas’ detailed below, actually join the two villages to become one – presumably because the person with the pen drawing the line, is unaware of the distinctive character of the two villages or simply does not care, about the implications of the proposal.

Attached documents:

Comment: MM2 - LPMM18/2960  
Respondent: Ardina Edwards  
Agent:  

I comment below on the set of main modifications to the amended GBC Local Plan:

1. NUMBER OF HOUSES(MM2)

The current version of the Plan has increased the number of houses from 12,426 to 12,600. However, the ONS recently released the projected household growth figures which show a 40.5% reduction to 6,635 households or 4,507 less. This is equivalent, for example, to the dwellings proposed at Wisley airfield (site A35, MM40) of 2,000 and Gosden Hill Farm (site A25, MM35) of 1,800 plus a further 707 dwellings at any of the various other targeted sites.

Consequently the increase seems unwarranted.

2. RE-OPENING THE PUBLIC EXAMINATION (MM2)

Due to the very large differences between the Plan and the current ONS household data, the Public examination of the Plan by the Planning Inspector must be re-opened.

3. POLICY P2 - GREEN BELT(MM2)

This policy has been redrafted but takes no account of the large reduction in projected households referred to in 1 above. 66% of the proposed housing is planned to be built on land that currently lies within the Green Belt.

Thus it is completely unwarranted to consider that the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances to justify any development in the Green Belt exist; they obviously do not.

Attached documents:
3. NEW POLICY S3 FOR THE TOWN CENTRE (MM3)

Policy S3 is verbose, weak, very general, and imprecise. It fails to clearly describe what is planned, whereabouts it is planned, or when it is proposed that it should happen.

The draft Policy is thus inadequate.

 Attached documents:

5. POLICY A35- FORMER WISLEY AIRFIELD (MM40)

On June 13, 2018, the Secretary of State published his decision to uphold the Councils' decision to refuse permission for the Wisley Airfield planning application (15/P/00012) and the applicant's planning appeal was dismissed.

Three months later the Local Plan (including Policy A35, essentially on the same scale as that rejected by the Secretary of State) was submitted for the present public consultation.

This seems extraordinary when the official household projection on which the Plan was based had been reduced by 40% (see 1 above).

The SNCI has been reduced to some 20% of its former size and about one third of the residual area is "safeguarded" for waste operations. Nevertheless, the Plan states that "every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures". This sounds contradictory and even insincere.

 Attached documents:

I strongly believe that GBC is dumping is housing policy in one area - an easy, lazy way of getting a "Tick in box" for having done their bit for housing policy. The continual increase in stakes gives me the impression of inserting a negotiating margin so that GBC can say "Look we have drooped 25% or our original proposals" but in reality there is still a huge chunk left.

I would comment more but I believe I have covered the essentials and added a few personal opinions.

 Attached documents:
MM27, MM42, MM42 and MM48 Transport Strategy

The implications upon traffic that MM41 (Policy A43), MM42 (Policy A58), MM44 (A63) will bring are not addressed to any worthwhile depth outline at a high-level by the A3 changes, the Clandon slip roads. GBC offers up find sounding words but no serious "meat" with regards to full assessments to serious increase in traffic with impact on Send Barnes and Send Road with an increase of several thousands of cars acerbating the current, existing traffic problems.

More houses will be hit by traffic pollution, noise, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/3560  Respondent: Robin L. Smith 10972833  Agent:

MM41 - area at Garlick's Arch, Sendmarsh (Policy A43)

- A 37 % increase to the current housing numbers in a relatively compact area is excessive
- Over 7000 objections to the previous lower number was ignored > is Guildford a "listening" council or a "Bulldozing" council?
- Impact on Green belt with beautiful woodland
- Will make Ripley, Sendmarsh and Send one large continuous village > over development and denaturing the current land beyond recognition
- Flooding (thus the name Sendmarsh) a problem
- A bare minimum of an extra 800 cars > a very low estimate considering you need a car due to lousy public transport - with most households at 3 or 4 cars being nearer the norm
- Heavy impact on current schools (plus dropping parents dropping off congestion) and local medical services.

Attached documents:

Comment: MM42 - LPMM18/3562  Respondent: Robin L. Smith 10972833  Agent:

MM42 - Area Burnt Common (Policy A58)

- This has been increased twice to arrive at a doubling since it element was first promulgated then deleted from the 2014 Plan
- This proposed industrial allocation will become the largest in any village in the Borough
- Putting an industrial estate on the Green Belt (contradiction of Plan element MM - Green Belt Policy) is even more outrageous. Slyfield has unused capacity
- The justification for such an outsized increase of Industrial in such a small area is suspect at best, ill-planned at worse with the latter the front runner.
- Traffic is already awful in the area and this will put an extra huge burden on the local road infrastructure that is in a poor state of repair,

**Attached documents:**

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**Comment:** MM42 - LPMM18/3573  **Respondent:** Robin L. Smith 10972833  **Agent:**

**MM27, MM42, MM42 and MM48 Transport Strategy**

The implications upon traffic that MM41 (Policy A43), MM42 (Policy A58), MM44 (A63) will bring are not addressed to any worthwhile depth outline at a high-level by the A3 changes, the Clandon slip roads. GBC offers up find sounding words but no serious "meat" with regards to full assessments to serious increase in traffic with impact on Send Barnes and Send Road with an increase of several thousands of cars acerbating the current, existing traffic problems.

More houses will be hit by traffic pollution, noise, delays and gridlock.

**Attached documents:**

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**Comment:** MM44 - LPMM18/3564  **Respondent:** Robin L. Smith 10972833  **Agent:**

**MM44 - Alderton's Farm (Policy A63)**

- This disappeared from an earlier draft due to the number of objections and suddenly freshly reappeared for the public examination in July. Use of wrong version, a copy/paste error or just trying to slip things in again?

- Contradicts Green Belt policy outlined in MM9

- It will completely ruin the historical heritage around Sendmarsh Green

- The additional traffic will increase pressure on junctions at both ends of Sendmarsh Road

- The cumulative total in houses from developments at Garlick Arch (550), Clockbarn (60), Winds Ridge (40), resulting to an addition of 770 house to the current 1700 in Send is overkill and far, far too much for the local infrastructure

**Attached documents:**

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**Comment:** MM44 - LPMM18/3574  **Respondent:** Robin L. Smith 10972833  **Agent:**

**MM27, MM42, MM42 and MM48 Transport Strategy**

The implications upon traffic that MM41 (Policy A43), MM42 (Policy A58), MM44 (A63) will bring are not addressed to any worthwhile depth outline at a high-level by the A3 changes, the Clandon slip roads. GBC offers up find sounding words but no serious "meat" with regards to full assessments to serious increase in traffic with impact on Send Barnes and Send Road with an increase of several thousands of cars acerbating the current, existing traffic problems.
More houses will be hit by traffic pollution, noise, delays and gridlock.

Attached documents:

Comment: MM48 - LPMM18/3577  Respondent: Robin L. Smith 10972833  Agent:

**MM27, MM42, MM42 and MM48 Transport Strategy**

The implications upon traffic that MM41 (Policy A43), MM42 (Policy A58), MM44 (A63) will bring are not addressed to any worthwhile depth outline at a high-level by the A3 changes, the Clandon slip roads. GBC offers up find sounding words but no serious "meat" with regards to full assessments to serious increase in traffic with impact on Send Barnes and Send Road with an increase of several thousands of cars acerbating the current, existing traffic problems.

More houses will be hit by traffic pollution, noise, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/3566  Respondent: Robin L. Smith 10972833  Agent:

**MM9 Green Belt Policy**

It appears that GBC does not adhere to the Green Belt Policy with the current version of its plan with many encroachments on said Green Belt. No erosion of this worthy policy is justifiable and there is a strong suspicion that this is the thin end of the wedge with more rapacious developers grabbing what they can.

Attached documents:

Comment: MM41 - LPMM18/1348  Respondent: Mrs Julie Cameron 10984385  Agent:

I object to the modifications suggested at MM41 to increase the number of proposed homes at Garlicks Arch from 400 to 550, of which over 80% will be built in the next 5 years, despite objections to the original figure of 400 homes. This is in conflict with MM9 (proposed limitations to Green Belt infilling) and would connect neighbouring locations. The impact on the local infrastructure would be detrimental: the road network is already overstretched, especially at peak times, because of the river crossing and nearby A3 and M25 and an additional 1,100 vehicles (based on 2 per household, an absolute requisite for living in the area, as there is little public transport) would prove adverse to local air quality. Nearby schools and doctors' surgeries, already stretched to capacity, would reach breaking point, meaning more road use for travel to nearby schools and medical centres. It has previously been established that Garlicks Arch is an area of ancient woodland, a valuable asset in an area of increasing urbanisation. It is subject to frequent flooding and contaminated by lead shot, both factors which make it unsuitable for building.

Attached documents:
Comment: MM42 - LPMM18/1356  Respondent: Mrs Julie Cameron 10984385  Agent:

I object to the revised proposal to increase land for industrial use and storage at Burnt Common. I understand that there has been no proven demand for such an increase, but had there been, Burnt Common would be an unsuitable location, in a semi-rural location where people are living. There is already capacity elsewhere in the Borough, such as Slyfield Industrial site. The road infrastructure in the area is already stretched to capacity because of the location near the A3 and M25 and the river crossing in Send. Anyone who has tried to leave Send on a weekday morning will be aware of the build up of traffic at the Burnt Common roundabout (where Little Waitrose is located) as traffic thunders at speed down the sliproad from the A3 and residents from Send, Ripley and locations further afield such as Old Woking, and Kingfield accumulates at the roundabout. The road structure through Send is stretched to the limit at such times and to increase this would further reduce air quality in an area where our children are being educated.

Attached documents:

Comment: MM44 - LPMM18/1355  Respondent: Mrs Julie Cameron 10984385  Agent:

I object to the proposal for 120 new homes on land at Alderton's Farm, Sendmarsh. I understand that this was not included in initial proposals and seems therefore to have introduced without the full consultation. The proposal is out of line with MM9 in that it the housing would be built on a Green Belt site outside the village of Send. Whether Sendmarsh can be regarded as a village itself is a moot point, being historically a row of houses built around a green with the later addition of a housing estate. It has no amenities as such, except for a pub. Building here would cause further erosion of the countryside between Sendmarsh and Send with a corresponding loss of open space and its associated habitat. As such, residents would rely on the local school and medical practice in Send, both already operating at capacity. Additional traffic (as many as 240 motor vehicles) would pressure local roads, including the crossroads at Mays Corner, where large a build up of traffic is apparent morning and evening. The additional flow would cause more disruption outside Send school where the road is already congested at peak school times, especially the morning when parking is erratic and dangerous, as parents seek to drop off their youngsters.

Attached documents:

Comment: MM9 - LPMM18/1346  Respondent: Mrs Julie Cameron 10984385  Agent:

I object to the "limited infilling" proposals at MM9 relating to Send/Sendmarsh and Ripley. These are separately identifiable settlements with their own specific demarcations and this should be recognised as preventing "infilling" which would sacrifice their separate identities. The wording of this modification is sufficiently vague as to provide opportunity for development which would sacrifice the valuable Green Belt in these village locations at the expense of local communities. Further building on the edge of Send would risk it merging with locations such as Sendmarsh, Burnt Common, Burpham Ripley and Old Woking.

Attached documents:

Comment: MM13 - LPMM18/4122  Respondent: Richard Green 10986209  Agent:
• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

Comment: MM2 - LPMM18/4120  Respondent: Richard Green 10986209  Agent:

• I object on the grounds set out below.
• I would like to call for the examination in public to be reopened so that the latest Office of National Statistics can be used.
• As far as I’m aware I have not been advised of the consultation.
• I would also like to say that I support the representation made by WAG as advised by Richard Harwood QC

GENERAL

• MM2 The housing target is wrong.
• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/4124  Respondent: Richard Green 10986209  Agent:

• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes.
• Strategic sites are to be exempt from design constraints.
• There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/4125  Respondent: Richard Green 10986209  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/4126  Respondent: Richard Green 10986209  Agent:
SITE SPECIFIC – A35 – Three Farms Meadows

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR.
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
- MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

Attached documents:

Comment: MM41 - LPMM18/4123  Respondent: Richard Green 10986209  Agent:

- MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].
- There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM9 - LPMM18/4121  Respondent: Richard Green 10986209  Agent:

MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM25 - LPMM18/1088  Respondent: Michael Dawson 10986241  Agent:

MM25 Historic Environment: We think the new proposed wording is very vague and offers inadequate guidance to protecting a heritage asset. We think the previous wording was more specific and offers greater guidance and protection and should be restored and the new proposed wording rejected.

Attached documents:

Comment: MM6 - LPMM18/1087  Respondent: Michael Dawson 10986241  Agent:

We wish to make the following comments on the main modifications identified in bold below:
**MM6 Affordable Homes 4a:** Relates to developers claiming they can't provide the required amount of affordable housing because it would not be economically viable. The previous wording stated 'may consider the following to assist with delivering a scheme' and now says 'will' rather than 'may'. We feel strongly that it should revert back to the original wording "may" as this will enable the Council to achieve more affordable housing and not enable developers to find excuses not to make such provision. Developers are already pushing these boundaries without making it even easier for them. There is no need to change this wording.

**Attached documents:**

**Comment: MM27 - LPMM18/2541  Respondent: Ian Pigram 10987745  Agent:**

The transport strategy (MM27, MM41, MM42 and MM48), especially the A3 Clandon Road slip roads, inadequately addresses the health and transport implications for traffic due to the proposed developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's, together with Gosden Hill, Ockham and Wisley. A3 slip roads to and from London would attract traffic from Woking and further afield, to the detriment of village life and health.

**Attached documents:**

**Comment: MM41 - LPMM18/2538  Respondent: Ian Pigram 10987745  Agent:**

At Garlicks Arch (MM41) the original number of houses has been increased to 550. We objected to the original number of 400, increasing the number of houses to 550 is totally inconsiderate of those living in the local community, due in large part to the increase in traffic and the strain on local school and medical facilities. This would constitute over developed unification of Send and Ripley. The loss of Green Belt, especially that with ancient woodland, would constitute an irreversible tragedy. The Garlick's Arch location is prone to frequent flooding, the long lived stream flowing through the area follows the path of alluvium up to 2 million years old.

**Attached documents:**

**Comment: MM42 - LPMM18/2542  Respondent: Ian Pigram 10987745  Agent:**

The transport strategy (MM27, MM41, MM42 and MM48), especially the A3 Clandon Road slip roads, inadequately addresses the health and transport implications for traffic due to the proposed developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's, together with Gosden Hill, Ockham and Wisley. A3 slip roads to and from London would attract traffic from Woking and further afield, to the detriment of village life and health.

**Attached documents:**

**Comment: MM42 - LPMM18/2539  Respondent: Ian Pigram 10987745  Agent:**
Having been deleted from the 2014 plan, MM42 has now doubled in size. With no special circumstances, this conflicts with MM9. Slyfield has alternative space and should be the focus of industrial land use. Send Business Centre has also increased in size. MM42 would result in an inconsiderate concentration of business land in Send, to a level greater than in any other village. The unimaginable increase in traffic and nitrogen dioxide levels would make it difficult for residents to use the road infrastructure and lead to ill health.

The transport strategy (MM27, MM41, MM42 and MM48), especially the A3 Clandon Road slip roads, inadequately addresses the health and transport implications for traffic due to the proposed developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's, together with Gosden Hill, Ockham and Wisley. A3 slip roads to and from London would attract traffic from Woking and further afield, to the detriment of village life and health.

Attached documents:

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Comment: MM44 - LPMM18/2540  Respondent: Ian Pigram 10987745  Agent:

Following objections the land at Aldertons Farm (MM44) was removed from an earlier draft but reinserted in July. This is another example of MM9 policy contradiction, there being no special circumstances for Green Belt removal in MM44. The additional traffic from this and other proposed developments in Send due to overall planned 45% increase in housing would put excessive strain on the Send transport infrastructure and residents lives.

Attached documents:

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Comment: MM48 - LPMM18/2543  Respondent: Ian Pigram 10987745  Agent:

The transport strategy (MM27, MM41, MM42 and MM48), especially the A3 Clandon Road slip roads, inadequately addresses the health and transport implications for traffic due to the proposed developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's, together with Gosden Hill, Ockham and Wisley. A3 slip roads to and from London would attract traffic from Woking and further afield, to the detriment of village life and health.

Attached documents:

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Comment: MM9 - LPMM18/2537  Respondent: Ian Pigram 10987745  Agent:

Dear Planning Policy Team,

I'd like to comment on the Main Modifications to your local plan. This consultation unreasonably only allows comments to be made on the Main Modifications. The responses by all to these modifications must be read alongside previous objections to the plan.

The policy for Green Belt (MM9) states that it will be protected except in very special circumstances. Those circumstances being limited infilling outside the boundaries where it can be demonstrated the site should be within the village. This is a very weak statement and open to abuse from speculators to the detriment of village residents.

Attached documents:
Comment: MM2 - LPMM18/3221  Respondent: Barry & Renate Grossmith 10988417  Agent:

We support the representation made by Wisley Acton Group (WAG) which was written with advice from Richard Harwood QC. We also object to not having been advised of the consultation by your authorities and call for the examination in public to be reopened so that the latest Office of National Statistics can be used.

In general your proposals make a mockery of the concept of the Green Belt. The biased evidence by which you wish to bring this about calls into question the integrity of your Officers.

Attached documents:

Comment: MM27 - LPMM18/4389  Respondent: Victoria Bean 10990465  Agent:

MM27 MM41 MM42 MM48

the traffic implications on the village are huge, it would not be able to cope with thousands more cars everyday. The roads would be gridlocked, there would be increased noise and air pollution.

The village cannot cope with the huge number of proposed houses and industrial units, it will change and destroy the village environment.

Attached documents:

Comment: MM41 - LPMM18/4377  Respondent: Victoria Bean 10990465  Agent:

MM41 Garlicks Arch

I object to this because:

the number of houses is excessive and previous objections have been ignored to a lower number of houses.

the area is in the green belt and is an area of ancient woodland.

the number of extra cars from the houses will be huge, using already congested roads around the area.

one of the local primary schools which the children living in the new houses would have gone to has been CLOSED. Where will they go to school as there will now not be enough school places. The schools are already over subscribed.

the medical centre is already unable to cope with existing patients. When ringing for appointments we are already told to go to the walk in centre as they can't help. This is unacceptable and will be made worse.

Attached documents:

Comment: MM41 - LPMM18/4391  Respondent: Victoria Bean 10990465  Agent:
the traffic implications on the village are huge, it would not be able to cope with thousands more cars everyday. The roads would be gridlocked, there would be increased noise and air pollution.

The village cannot cope with the huge number of proposed houses and industrial units, it will change and destroy the village environment.

Attached documents:

**Comment:** MM42 - LPMM18/4384  **Respondent:** Victoria Bean 10990465  **Agent:**

- MM42 Burnt Common
  - I object to this because:
    - there is no need for more industrial space when existing areas of this are unused.
    - the surrounding roads will not be able to cope with the increased traffic.

- MM44 Alderton's Farm
  - I object to this because:
    - it is greenbelt land.
    - this has already been deleted from a previous draft and now put back in.
    - these houses are unnecessary as there are hundreds of other proposed houses in the area, far too many for the village to cope with.
    - the narrow roads in the area will not be able to cope with the huge amount of increased traffic.

Attached documents:

**Comment:** MM42 - LPMM18/4392  **Respondent:** Victoria Bean 10990465  **Agent:**

- MM27 MM41 MM42 MM48
  - the traffic implications on the village are huge, it would not be able to cope with thousands more cars everyday. The roads would be gridlocked, there would be increased noise and air pollution.
  - The village cannot cope with the huge number of proposed houses and industrial units, it will change and destroy the village environment.

Attached documents:
Comment: MM48 - LPMM18/4394  Respondent: Victoria Bean 10990465  Agent:

MM27 MM41 MM42 MM48

the traffic implications on the village are huge, it would not be able to cope with thousands more cars everyday. The roads would be gridlocked, there would be increased noise and air pollution.

The village cannot cope with the huge number of proposed houses and industrial units, it will change and destroy the village environment.

Attached documents:

Comment: MM2 - LPMM18/4452  Respondent: Abbey Jarman 10991841  Agent:

The plan does not adequately address the issue of plenty of land being available within Guildford town to build houses that are proposed to be built on greenbelt land. There is less need for retail in the town centre. Build houses there instead of miles out where people are dependent on cars.

I appreciate that it's MUCH easier for developers to build on greenbelt and their profits would be greatly reduced by looking at ways to make the town centre work. Has GBC established what 'land banks' the developers currently hold in the area?

The current plan DOES NOT adequately address this issue.

The greenbelt is one of the reasons that make Guildford a nice place to live.

Attached documents:

Comment: MM13 - LPMM18/3201  Respondent: Trevor W. Orpwood 10991873  Agent:

Amendment MM13

I object to this amendment because given current shopping trends and the decline in the “High Street” there is far too much allocation for retail use in the town centre. The retail allocation should be put to better use, i.e. providing sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/3198  Respondent: Trevor W. Orpwood 10991873  Agent:

Specific Objections

Amendment MM2
I object to an amended plan for which the housing target out of date and based on incorrect information. The lastest ONS statistics show a much reduced demand for housing and this needs to be reflected in the plan and on its own removes the requirement for Guildford to meet Woking’s housing shortfall.

The council has turned its own spatial strategy on its head and instead of concentrating on Brownfield sites in Guildford Town Centre where the big landowners like Network Rail, Legal and General and Guildford Corporation would be more than happy to realise the increase the value of that a change to residential use would bring. Building in the Green Belt and rural areas should be a last resort.

The addition of another 500 houses in Send (which will be car dependent) will have a severe impact on Portsmouth Road Ripley, and the A3 and there is no indication that this has been given proper consideration.

Attached documents:

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**Comment:** MM23 - LPMM18/3202  **Respondent:** Trevor W. Orpwood 10991873  **Agent:**

**Amendment MM23**

I object to (Policy D1) which dilutes the requirement for the social dimensions of sustainability (e.g. walking distances and pedestrian and cycle routes) and the fact that strategic sites are to be exempt from design constraints, which I consider to be a “developers charter” and abdicates GBC’s responsibility for development control to the detriment of adjoining owners and residents.

Attached documents:

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**Comment:** MM3 - LPMM18/3199  **Respondent:** Trevor W. Orpwood 10991873  **Agent:**

**Amendment MM3**

**Policy S3**

I object to the fact that the town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

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**Comment:** MM40 - LPMM18/3197  **Respondent:** Trevor W. Orpwood 10991873  **Agent:**

**Proposed Amendments to Guildford Borough Local Plan**

**General Objections**

I object to the Council unilaterally removing the Wisley Airfield Site from the Green Belt they have no mandate from the people of Guildford and Surrey to do this.
The only reason for this this dubious manoeuvre is to undermine the Secretary of State for the Environment’s decision that the Wisley Airfield development “would represent inappropriate development in the Green Belt, and should not be approved except in very special circumstances” and to try to get around the fact that the provision of housing is not an “exceptional circumstance.”

It is also illogical that GBC should take this action given that they unanimously supported the refusal of the original application, and because the conservative members stated in their election manifesto that they would not build on green belt land.

I also object to the Council’s failure to communicate adequately with residents about the current amendments to the Local Plan under the guise of compliance with GDPR. All the 32,000 or so persons who responded to the plan in 2016 should have been given the opportunity respond this time and not to have done so is a clear and unilateral disenfranchisement.

**Attached documents:**

**Comment: MM40 - LPMM18/3205**  
**Respondent:** Trevor W. Orpwood 10991873  
**Agent:**

**SITE SPECIFIC – A35 – Three Farms Meadows**

I object to the amendments relating to this site as follows:

1. The addition of land to the south of the appeal site does not mitigate the density issue as much as it appears to on the plan as building is not permitted within a certain radius the Ockham VOR (vhf omni-directional range) air traffic control beacon).
2. The land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.
3. In breach of case law an Appropriate Assessment and a Habitats Regulation Assessment have not been completed.

**Conclusion**

Due to the inadequacies and shortcomings listed above and the fact that so many people have been excluded from this consultation I hereby call for the examination in public be re-opened.

**Attached documents:**

**Comment: MM41 - LPMM18/3203**  
**Respondent:** Trevor W. Orpwood 10991873  
**Agent:**

**Amendment MM41**

I object to the fact that the proposed Transport Strategy places far too much reliance on infrastructure improvements some of which are uncertain and all of which are beyond the council’s control and have no fixed timescale. There is already a 2 year delay on Highways England RIS scheme for J10 of the M25 and this has a direct effect on the development of Site A35 – TFM; Site A43– Garlicks Arch; and Site MM44 – Aldertons Farm].

**Attached documents:**
Comment: MM50 - LPMM18/3204  Respondent: Trevor W. Orpwood 10991873  Agent:

Amendment MM47

I object to the fact that the size of the SNCI has been drastically reduced. The whole site qualifies on ecological grounds and there is no valid justification for altering the SNCI boundary. The biodiversity of the SNCI will also be destroyed by the proposed development.

Attached documents:

Comment: MM9 - LPMM18/3200  Respondent: Trevor W. Orpwood 10991873  Agent:

Amendment MM9

I object to the reliance on “infilling” in and around villages, which is over done and will result in the weakening of protection of the countryside.

Attached documents:

Comment: MM13 - LPMM18/3520  Respondent: Philip Erhardt 10992417  Agent:

5. MM13  Too much retail space proposed. Not based on current information.

Attached documents:

Comment: MM2 - LPMM18/3515  Respondent: Philip Erhardt 10992417  Agent:

We think your local plan is unsound and should be re-examined for the following reasons:

1. MM2. The latest ONS figures and projections make the proposed housing numbers invalid, and as a result the public hearings should be re-opened and re-evaluated.
2. The grounds for green belt development are inadequate and should be re-examined.

Attached documents:

Comment: MM23 - LPMM18/3519  Respondent: Philip Erhardt 10992417  Agent:

4. MM23-POLICY D1  GBC as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
Comment: MM3 - LPMM18/3518  Respondent: Philip Erhardt 10992417  Agent:

There are also problems with the Main Modified Plan:

1. MM3- POLICY S3 The GBC must deliver real and coordinated results. The Town Centre must be designated a strategic site.

2. MM3- POLICY S3 Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

3. MM3-POLICY S3 GBC should adopt Guildford vision’s proposals.

Comment: MM40 - LPMM18/3521  Respondent: Philip Erhardt 10992417  Agent:

Local Problems:

1. MM40 Wisley should be retained as Green Belt and removed from the plan especially after the Inspectors report.

Comment: MM41 - LPMM18/3517  Respondent: Philip Erhardt 10992417  Agent:

1. There is too much reliance of A3 improvements which may not happen.

Comment: MM41 - LPMM18/3522  Respondent: Philip Erhardt 10992417  Agent:

2. MM41 Garlicks Arch should be retained as Green Belt especially in view of revised housing need.

Comment: MM9 - LPMM18/3516  Respondent: Philip Erhardt 10992417  Agent:
1. There are many Brownfield sites in the centre of Guildford that have not been considered and obviously these should be exploited before any Green Belt is built upon.
2. The grounds for green belt development are inadequate and should be re-examined.

Attached documents:

**Comment:** MM27 - LPMM18/611  **Respondent:** Pam Harnor 10995233  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM41 - LPMM18/607  **Respondent:** Pam Harnor 10995233  **Agent:**

**MM41 Land at Garlick’s Arch, Send Marsh, policy A43**

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
- It is Green Belt containing ancient woodland
- It will join up Send and Ripley and constitute over development
- The East Clandon Stream which runs through the site is shown as a high risk flood area by the Environment Agency and any development on the site will increase water run-off endangering properties downstream in Send Marsh which are already at risk
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point
- With Alderton’s (120), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure

Attached documents:

**Comment:** MM41 - LPMM18/612  **Respondent:** Pam Harnor 10995233  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

**Comment:** MM42 - LPMM18/608  **Respondent:** Pam Harnor 10995233  **Agent:**

MM42 Land at Burnt Common, London Road, Send, Policy A58

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

**Attached documents:**

**Comment:** MM42 - LPMM18/613  **Respondent:** Pam Harnor 10995233  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

**Comment:** MM44 - LPMM18/609  **Respondent:** Pam Harnor 10995233  **Agent:**

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green belt site with no special circumstances so it contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure at the Send Crossroads and the already congested junction of Send Marsh Road and Portsmouth Road
- With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure

Attached documents:

**Comment: MM48 - LPMM18/614  Respondent: Pam Harnor 10995233  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment: MM9 - LPMM18/610  Respondent: Pam Harnor 10995233  Agent:**

**MM9 Green Belt Policy**

Although the “modification” claim to protect the Green Belt except in very special circumstances, GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

**Comment: MM2 - LPMM18/2443  Respondent: Peter Cormack 10995297  Agent:**

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

Would you please register my following reservations and comments to Guildford Borough Council’s Modified Local Plan.

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.
B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound and NOT FIT FOR PURPOSE because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is far too much reliance on A3 improvements which are totally outside of the council’s control.
3. The town centre policy, S3, is inadequate and does nothing to address the infrastructure deficit.
4. The grounds for Green Belt development are totally inadequate and do not fulfil Central Government’s criteria for ‘EXCEPTIONAL’

CIRCUMSTANCES

1. I strongly request the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send, which even now is totally inadequate to handle the current volume of traffic. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with any increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

Traffic is already stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches regularly having to mount the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I firmly believe that traffic will increase significantly because of:
1. The proposed development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.

2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.

3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.

4. The development of 1800 houses at Gosden Hill.

5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is usually in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump in the railway bridge.

It was for these very strong reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site adjacent to and behind the station.

4. The sight lines for the exit of the Onslow Arms car park.
5. The extreme narrowness of the road near Summers.
6. Heavy lorries, buses and coaches are often unable to pass each other in the narrow parts of the road without mounting the pavement.
7. The sharp bend near Clandon Regis.
8. The narrowness of the road at the Bull’s Head Public House.
9. The Clandon Junior School and the extremely narrow footpath for children walking to school, putting their lives in jeopardy.
10. The sharp bend with poor sight lines in either direction at St Peter and St Paul’s church.
11. No continuous or safe and wide footpath through the total length of the village.
12. The speed of traffic.
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a total reconsideration of the policy of taking any sites out of the Green Belt.
The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

**E. The Guildford Residents’ Association’s Objections and Concerns Which I Share**

**MM2** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

**MM2** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

**MM2** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

**MM2** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

**MM2** Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/2446  **Respondent:** Peter Cormack 10995297  **Agent:**

**MM23** In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

**MM23** (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

**MM23** Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

**MM23** If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

**MM23** should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**MM23** – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM3 - LPMM18/2444  **Respondent:** Peter Cormack 10995297  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**F. The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

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**Comment:** MM31 - LPMM18/2447  **Respondent:** Peter Cormack 10995297  **Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment:** MM32 - LPMM18/2448  **Respondent:** Peter Cormack 10995297  **Agent:**

MM32 A height limit for **White Lion Walk** is required.
### Attached documents:

**Comment: MM33 - LPMM18/2449**  **Respondent:** Peter Cormack 10995297  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at *Slyfield* and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

### Attached documents:

**Comment: MM35 - LPMM18/2450**  **Respondent:** Peter Cormack 10995297  **Agent:**

MM35 *Gosden Hill Farm* should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at *Gosden Hill* to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

### Attached documents:

**Comment: MM41 - LPMM18/2451**  **Respondent:** Peter Cormack 10995297  **Agent:**

MM41 *Garlick’s Arch* should be retained as Green Belt in view of the revised housing need, rather than expanded.

### Attached documents:

**Comment: MM44 - LPMM18/2452**  **Respondent:** Peter Cormack 10995297  **Agent:**

MM44 The new Green Belt site at *Send* is not justified in view of the revised housing figures.

### Attached documents:

**Comment: MM9 - LPMM18/2445**  **Respondent:** Peter Cormack 10995297  **Agent:**

### Attached documents:
MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

**Comment:** MM2 - LPMM18/1304 **Respondent:** Mr John Flatman 10997249  **Agent:**

I wish to **OBJECT** to the Local Plan, for the following reason:

Policy MM2: the housing requirement figure for Guildford Borough is now incorrect. The latest ONS projections (Sept 2018) indicate a requirement for 300, not 672, extra dwellings per annum. Moreover, the ONS indicate that nationally the largest part of the extra dwelling requirement is for homes for the elderly.

This places a priority on redevelopment of Guildford town centre, the opportunities for which have by no means been exhausted in the proposed plan. Development of greenfield areas, such as at Wisley, are totally unnecessary: the whole of the new dwelling projection can be met from town centre and in-filling in towns and villages.

Since the latest projections appeared after the end of the formal plan examination, the examination should be re-opened.

**Attached documents:**

**Comment:** MM27 - LPMM18/503 **Respondent:** Richard Baldwin 10999873  **Agent:**

MM27/41/42/48

The A3 changes will not prevent a massive traffic impact on Send Barns Lane and Send Road’

**Attached documents:**

**Comment:** MM41 - LPMM18/500 **Respondent:** Richard Baldwin 10999873  **Agent:**

I object to the modifications:

MM41

An increase from 400 to 550 homes is excessive. Local schools, medical facilities and roads will not cope with this volume of housing.

The land is Green Belt, contains ancient woodland, and is subject to flooding.

**Attached documents:**

**Comment:** MM41 - LPMM18/504 **Respondent:** Richard Baldwin 10999873  **Agent:**
The A3 changes will not prevent a massive traffic impact on Send Barns Lane and Send Road.

Why build industrial and storage facilities on Green Belt. What is the justification?
There is a reduction in the demand for industrial land, and Slyfield has spare capacity.

Again, this is Green Belt land with no justification for building.

The A3 changes will not prevent a massive traffic impact on Send Barns Lane and Send Road.

Attached documents:
Comment: MM3 - LPMM18/1332  Respondent: Jan Benton 11000481  Agent:

I would like less retail and more homes in the town centre so that less will be built on Green Belt

Attached documents:

Comment: MM35 - LPMM18/1333  Respondent: Jan Benton 11000481  Agent:

Transport and Infrastructure - Even with new slip roads to/from the A3, there will be a heavy increase in traffic on the A3100 London Road. This traffic will be for all sorts of reasons, one being access to the Supermarkets and also for all the other amenities Burpham has to offer. This road is already heavily congested and will not cope with this increased traffic, it is certainly not wide enough to take additional lanes for buses and cycles.

Attached documents:

Comment: MM2 - LPMM18/3586  Respondent: Greta Edwards 11001505  Agent:

I would like to object to the current Local Plan modifications - and the fact that I have NOT been advised of the consultation. An explanation would be appreciated.

In any event it is clear that the HOUSING TARGET is wrong. I call for a further examination in public so that the latest Office of National Statistics can be used instead of the now dated data being presented.

And why on earth should we absorb Woking's unmet need - particularly in view of the threat to our own Green Belt, despite government assurances to protect it?

Attached documents:

Comment: MM40 - LPMM18/3588  Respondent: Greta Edwards 11001505  Agent:

With specific regard to THREE FARMS MEADOWS - for former Wuisley airfield - may I point out that the addition of land to the south of the appeal site does NOT mitigate the density issue as much of the said land is constrained by the VOR air traffic control beacon.

Attached documents:

Comment: MM41 - LPMM18/3587  Respondent: Greta Edwards 11001505  Agent:

It seems to me that there is far too much reliance on the A3 improvements which are clearly beyond the council's control and have no fixed time-scale.
Comment: Other comments - LPMM18/3589  
Respondent: Greta Edwards  11001505  
Agent:  

And when is GBC going to ensure that an Appropriate Assessment and a Habitat Regulations Assessment are completed. Right now GBC is in breach of case law.

Attached documents:

Comment: MM27 - LPMM18/894  
Respondent: Howard Milner  11003361  
Agent:  

MM27 MM41 MM42 and MM48

Again no proposal is made regarding the major increase in traffic to the immediate or surrounding areas, narrow roads and tight junctions in the villages of Ripley, Send, Old Woking and Clandon already prove problematic at peak times, how emergency services will be able to attend callouts at peak times is unthinkable. The tremendous increase in pollutants caused by the increase in traffic is yet another cause for concern, especially in the light of the removal of trees, hedges and grassland required to build all the homes in the immediate area, going against the environmentalists latest requests to plant more trees and create green spaces in an effort to improve air quality.

Attached documents:

Comment: MM41 - LPMM18/890  
Respondent: Howard Milner  11003361  
Agent:  

I am writing to you yet again as my previous letters seem to have been ignored, I believe mine and many other valid arguments against YOUR plans have been brushed aside with no consideration to the validity of their arguments.

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Having ignored previous concerns, over YOUR plans for 400 houses, YOU now want to build 550 houses on Green Belt with the loss of Ancient woodland, the land designated for this development is in a category 2 flood zone, any building on this area would undoubtedly increase run off into the East Clandon Stream which has in the past flooded properties including my own in Send Marsh. Whilst not officially designated a health risk, you would propose building under or close to Power Lines that have in the past been linked to health problems elsewhere. Again the impact on the local infrastructure has been totally ignored, Schools, Medical facilities and pressure on local roads of an increase at a conservative estimate of 1500 people and 1000 cars.

Attached documents:

Comment: MM41 - LPMM18/895  
Respondent: Howard Milner  11003361  
Agent:  

1259 of 2554
**Comment: MM42 - LPMM18/891**  **Respondent:** Howard Milner 11003361  **Agent:**

MM42 Land at Burnt Common, London Road, Send, Policy A58

Yet again previous concerns have not been addressed but completely ignored, YOU now wish to more than double the original proposed industrial development, again on Green Belt land whilst empty space and units exist on other sites within the borough. The congestion that this development would bring to the narrow roads through the local villages is unimaginable, large articulated lorries are already creating problems and having difficulties negotiating locally, causing holdups and delays as well damage to both the roads and footpaths.

**Attached documents:**

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**Comment: MM44 - LPMM18/892**  **Respondent:** Howard Milner 11003361  **Agent:**

MM27 MM41 MM42 and MM48

Again no proposal is made regarding the major increase in traffic to the immediate or surrounding areas, narrow roads and tight junctions in the villages of Ripley, Send, Old Woking and Clandon already prove problematic at peak times, how emergency services will be able to attend callouts at peak times is unthinkable. The tremendous increase in pollutants caused by the increase in traffic is yet another cause for concern, especially in the light of the removal of trees, hedges and grassland required to build all the homes in the immediate area, going against the environmentalists latest requests to plant more trees and create green spaces in an effort to improve air quality.

**Attached documents:**

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**Comment: MM44 - LPMM18/892**  **Respondent:** Howard Milner 11003361  **Agent:**

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

Well this one has certainly reared up out of ether again, YOU once again propose allowing building on Green Belt in contradiction of policy MM9. The added pressure of yet more traffic and people, should we conservatively guess at 200 cars, 400 people on the local infrastructure. A total proposed increase of 45% of housing in the local area, has anyone within committees considered an impact survey or even thought any of this through?
Again no proposal is made regarding the major increase in traffic to the immediate or surrounding areas, narrow roads and tight junctions in the villages of Ripley, Send, Old Woking and Clandon already prove problematic at peak times, how emergency services will be able to attend callouts at peak times is unthinkable. The tremendous increase in pollutants caused by the increase in traffic is yet another cause for concern, especially in the light of the removal of trees, hedges and grassland required to build all the homes in the immediate area, going against the environmentalists latest requests to plant more trees and create green spaces in an effort to improve air quality.

As a closing note I would ask all those councillors and local government officers involved in this decision making to make themselves known to the local residents, so that we can avoid them on any future election papers.

Whilst I can understand the need to develop on Green Belt in exceptional circumstances I cannot see how any of YOUR proposals can be considered to be EXCEPTIONAL, other than making money for developers and creating a loss of life style for the local villages and residents.

The traffic implications for Send with Garlick's Arch, Burnt Common, Clockbarn and Alderton's would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.
I wish to object to the recent modifications. These are my principal objections. I think Guildford Borough Council have failed to consider the residents of Send Marsh with an excessive amount of development in our area.

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

The increase of 37% in the number of houses is exceedingly high. It would change the character of the village, join up Send and Ripley so that it was over-developed and make it one large conglomeration of housing. A very high number of objections to the previous lower number of 400 have been completely ignored. You intend to develop Green Belt land, which floods and is contaminated by leadshot. The local infrastructure for medical facilities and schools would be swamped by this development, as would the adjacent roads, this development would make it worse and it would be gridlocked on a daily basis. Send Barns Lane is frequently at a standstill in the mornings already.

**Attached documents:**

**Comment: MM41 - LPMM18/886**  **Respondent: Elizabeth Milner 11003681**  **Agent:**

**Comment: MM42 - LPMM18/887**  **Respondent: Elizabeth Milner 11003681**  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send with Garlick's Arch, Burnt Common, Clockbarn and Alderton's would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.

**Attached documents:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

I cannot understand why this industrial and storage development is back in the plan after having been deleted from the 2014 plan. It would make life intolerable for residents, as well as poisoning them with dangerous levels of nitrogen dioxide. Please take this out of the plan and see sense. It is far too large an industrial development for any village in the borough and there is absolutely no need for it when there is unused space at Slyfield. I understand the Employment Land Needs Assessment showed a reduction in demand for industrial land so it is incomprehensible to develop this site, especially with this being on top of a 25% increase in Send Business Centre. Again, you would be gridlocking surrounding roads, especially the roundabout by the present Shell garage/Little Waitrose roundabout at Send Barns Lane.

**Attached documents:**

**MM27 MM41 MM42 and MM48 Transport Strategy**
The traffic implications for Send with Garlick's Arch, Burnt Common, Clockbarn and Alderton's would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.

**Attached documents:**

**Comment:** MM44 - LPMM18/883  
**Respondent:** Elizabeth Milner 11003681  
**Agent:**

MM44 Land at Alderton's Farm, Send Marsh Road Policy A63

Here again, you are intending to build on Green Belt land, which contradicts policy MM9. Send Crossroads will be under considerable pressure and with Garlicks Arch, Clockbarn and Winds Ridge developments, 770 houses would be added to the 1700 currently in Send, which is an increase of 45%. There is no rationale for this and it would ruin Send and the surrounding Green Belt.

**Attached documents:**

**Comment:** MM48 - LPMM18/888  
**Respondent:** Elizabeth Milner 11003681  
**Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send with Garlick's Arch, Burnt Common, Clockbarn and Alderton's would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.

Please do not ignore the objections of Send Residents. We have already objected en masse in the past to the unfair proposals of Guildford Borough Council where it has been proposed that Send is swamped with new developments, completely changing the nature and character of the village. These developments should be spread around some of the other villages. Send would become effectively a suburb of Woking with these developments.

Yours with great indignation at the lack of consideration to the objections already made by Send residents

**Attached documents:**

**Comment:** MM9 - LPMM18/884  
**Respondent:** Elizabeth Milner 11003681  
**Agent:**

MM9 Green Belt Policy
The proposed developments contradict Green Belt Policy and this could mean that any land on the fringes of our village could be developed in the future. Our village environment would be changed beyond recognition.

Attached documents:

Comment: MM41 - LPMM18/808  
Respondent: David Pycraft 11003969  
Agent:

**MM41 Land at Garlick's Arch, Send Marsh Burnt Common and Ripley**

In my objection to development at this site, I refer you to my previous observations (see MM44) regarding traffic safety and congestion along the A247, which is the planned route of access for site MM41. This is all the more pertinent when you take into consideration the pedestrian crossings along the road, including the school crossing.

I also refer you to the National Planning Policy Framework (point 80), as detailed above (see MM44), as to build extensively on this site would merge Ripley and Send villages into one. This is also another site prone to flooding. I also understand that it is contaminated with lead shot, which must raise serious issues about the health risk posed to any residents.

I am lead to believe that there were many thousands of objections previously to this site when the proposal was for 400 houses, so it is immensely distressing to know that these objections have been dismissed, and that the proposed number of houses has in fact risen to 550.

Attached documents:

Comment: MM42 - LPMM18/809  
Respondent: David Pycraft 11003969  
Agent:

**MM42 Land around Burnt Common warehouse, London Road, Send**

My first objection to development on this site is that the plan has been revised to increase development, from 7000 to 14,800 square metres. This makes no sense in light of the Employment Land Needs Assessment's conclusion that there the demand for industrial space is actually decreasing.

Another factor is the huge increase in traffic which would arise from this site. Access is through a narrow lane on a small but very busy roundabout (Burnt Common). Once again, there would be an unacceptable increase in the level of congestion around this area should it be developed.

These reasons qualify the site as 'inappropriate development' under Policy P2, MM9, Policy Paragraph (1). As with site MM44, there are no 'very special circumstances' to justify the development.

If the Council are determined to provide more industrial space in and around Guildford, then I would urge them to take a close look at Slyfield, where I understand there is a large amount of land which is currently available for industrial purposes.

The Local Plan for these sites in and around Send is wholly inappropriate. It fails to acknowledge that not only is much of the land unsuitable for development, but that the area simply does not have the infrastructure to cope. The roads are already at full capacity; the increase in traffic should these developments occur will lead to significantly higher levels danger for drivers and pedestrians, and of pollution for locals and the surrounding countryside. Furthermore, Send school and The Villages surgery are also already running at maximum capacity, and will be simply unable to cope with such a
huge expansion of the local population. Finally, the Local Plan violates the tenets of Green Belt policy. For these reasons I implore you to reconsider the Plan.

Attached documents:

Comment: MM44 -  LPMM18/807  Respondent: David Pycraft 11003969  Agent:

I wish to object to the proposed Local Plan for the village of Send, Send Marsh and the surrounding Green Belt area, which is not only unsuitable, but which also contradicts some policies, as detailed below.

**MM44 Land west of Alderton's Farm, Send Marsh Road, Send**

This area serves as a barrier between Send Marsh and the village of Send. The National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is 'to prevent neighbouring towns merging into one another'. Development at the site would therefore clearly be in breach of point 80.

Furthermore, I draw your attention to Policy P2, MM9, Policy Paragraph (1), which states that 'Inappropriate development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'. Any development on this site would clearly be inappropriate, for several reasons (and there does not appear to have been a demonstration of any 'very special circumstances').

Firstly, the road (B368 Send Marsh Road) which passes site MM44 in unsuitable for the huge increase in traffic which will result from its development, as the road is narrow with sharp bends at either end, thus slowing traffic. Indeed, the corner of Send Marsh Green has been the sight of several accidents; even more traffic will only add to the danger. Moreover, the huge increase in traffic will massively increase congestion in the area, joining/coming off the A3 into Send Marsh at one end of the B368, and coming off the A3 or joining/coming from Woking (itself undergoing massive redevelopment) at the other end of the B368, along the A247. The A247 suffers from severe congestion, and is often crawling or at a standstill through Send village during the times of the school drop/pickup and the daily rush hours.

Yet another factor that cannot be understated is the unsuitability of the land itself at site MM44. As someone who has lived near the site for 36 years, I can attest to the fact that it is flooded every winter, and is frequently waterlogged for most of the year.

This site had been removed from the Local Plan, no doubt after careful analysis, so it is mystifying that it is suddenly back under consideration, when the same reasons to have disqualified it previously still exist.

Attached documents:

Comment: MM2 -  LPMM18/3781  Respondent: Nick Thomas 11005473  Agent:

A few closing comments. I'm a resident of Send Hill. The building of forty houses and a travellers’ site here (document 003a, section 11.38) is even more disproportionate than what you're proposing for the village as a whole, reinforcing the impression that you are making no attempt to spread new development out across the Borough.

At another level, I am informed that a respected consultancy called Barton Willmore estimates the annual housing need for Guildford Borough at 431, not much over half the number being used by GBC (789). September data from the ONS suggests that a figure of 460 is accurate, very close to the Barton Willmore figure. In the light of these facts, please reconsider POLICY S2 and the implications for what is needed in Send.
It would be great to think that as a result of the time and thought residents put into these discussions, Guildford BC would make a genuine attempt to create a workable plan, but as above I'm afraid I have no expectation any more that our objections will result in anything of the kind. Nevertheless, I submit the above in the hope that the strength of feeling of Send residents will eventually make some impression on you and lead to a more moderate and sensible set of proposals.

Attached documents:


Proposed changes to the A3 and the Clandon slip roads (document 003a, sections 11.14 to 11.34) will help to feed traffic more quickly into the local road system - what then? Jams will feed back onto the major roads and cause massive problems for both local and longer-distance motorists. GBC's assessment of possible solutions to this is extremely superficial - it's easy to write a few sentences promising infrastructure will follow but this is a real problem to which there won't be an acceptable solution: a proper amount of infrastructure to cope with this amount of development will devastate the green belt and destroy the character of the area.

Your current document suggests (Appendix 11.4 of GBC Responses to Matters, Issues and Questions reference 003b) that the increase in morning traffic on the A247 Send Road will be just 3% - after adding nearly 40% to the housing stock of the village. Heaven only knows how anyone arrived at this figure, but you don't need complex calculations to see that an estimate is out by an order of ten, as this is.

Attached documents:

Comment: MM41 - LPMM18/3774  Respondent: Nick Thomas 11005473  Agent: I have written to you on more than one previous occasion to express my dismay about GBC's plans for development in Send and the surrounding areas. Every few years the Borough Plan comes back, every time GBC says it has listened to the objections of residents, and every time the new plan contains a larger amount of the same unacceptable proposals than the previous one. I have no impression whatsoever that the Council really reads or is interested in the views of residents, but I believe the feelings of people in Send are sufficiently strong that we'll keep voicing them however long it takes.

My general objections to the massive burden of development proposed for the area have not changed and I will set them out in brief below before getting more specific about the latest round of proposed actions.

1. The analysis of ‘need’ for housing in the Borough as a whole is fundamentally flawed, based on a combination of flimsy survey evidence and the misinterpretation of this and other indicators, some of it by consultants lacking an understanding of the area; and on national-level generalisations about growth of housing demand. Previous objections by myself and others have gone into more detail on this view, and the fact of local and central government both trying to justify the policy by saying the other is insisting on it and they don't really want it and are trying to fight on the residents' side, speaks volumes.

2. Green belt legislation allows for building on designated land only in 'exceptional circumstances'. The current proposals and the national initiative behind them state clearly that the drivers of the Borough Plan and others like it are precisely the unexceptional circumstances against which the green belt is a legislative guarantee: pressure of population and demand for housing to meet it. If government has decided that the green belt legislation should be repealed in its entirety, that's a different issue: until that time, it expressly forbids what you are doing now.
3. the Plan covers housing, industrial sites and other construction of buildings in some detail, but still skates over the surface of the issue of infrastructure to support this development. Schools and medical facilities will need to follow and more thought should be given to how these can cope with demand. *Roads* on the other hand are something it's very difficult to imagine coping with the suggested levels of new build, however you choose to plan them. They are already clogged: Send residents in the last few weeks have had roadworks with temporary traffic lights in two adjacent spots on the Portsmouth Road between Ripley and the A247 roundabout, and one on Send Road, plus the simultaneous closure of Tannery Lane - these are all within half a mile of each other and have made it almost impossible to get anywhere, but they are just a tiny very local and current example of how the existing roads creak under the burden of existing traffic. The road into Guildford (crucial for all those new commuters you'll be creating) are far worse. Your proposals will add around 770 new houses to an area with about 2,000 in it at present and which already experiences these difficulties - do you honestly think sufficient roads can be built to carry the extra traffic without completely tearing up the local countryside?

Specifically, I object to the current proposals on the following grounds:

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

As per my letter of three years ago, the Garlick's Arch proposals (document 003a sections 11.36 to 11.37) will bring Send, Ripley and surrounding areas to a standstill, *even if* new roads are built cutting through more of the green belt - and these plans have been considerably enlarged since that time (550 houses instead of 400). The area also contains ancient woodland and is unsuitable for other reasons including frequent flooding.

**MM27 MM41 MM42 and MM48 / Transport Strategy**

Proposed changes to the A3 and the Clandon slip roads (document 003a, sections 11.14 to 11.34) will help to feed traffic more quickly into the local road system - what then? Jams will feed back onto the major roads and cause massive problems for both local and longer-distance motorists. GBC's assessment of possible solutions to this is extremely superficial - it's easy to write a few sentences promising infrastructure will follow but this is a real problem to which there won't be an acceptable solution: a proper amount of infrastructure to cope with this amount of development will devastate the green belt and destroy the character of the area.

Your current document suggests (Appendix 11.4 of GBC Responses to Matters, Issues and Questions reference 003b) that the increase in morning traffic on the A247 Send Road will be just 3% - after adding nearly 40% to the housing stock of the village. Heaven only knows how anyone arrived at this figure, but you don't need complex calculations to see that an estimate is out by an order of ten, as this is.

**Attached documents:**

Comment: MM42 - LPMM18/3775   Respondent: Nick Thomas 11005473   Agent: 

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The latest proposals have more than doubled the size of this already drastic development of industrial and storage space, and there is nothing like it proposed in any other village in Guildford Borough. Why is everything dumped on Send? Brownfield sites are available for this building, and the Slyfield estate could more easily bear much of the burden - 'though less profitably for developers if that is your only consideration. The proposal therefore contradicts MM9 green belt provision.

My business is now based in Send Business Centre, which is also growing at present - that's fine although Tannery Lane is narrow and already busy, but surely this means Send has already taken a share of the proposed industrial development, the need for which has not by the way been proven any more than has the demand for residential building.

**MM27 MM41 MM42 and MM48 / Transport Strategy**
Proposed changes to the A3 and the Clandon slip roads (document 003a, sections 11.14 to 11.34) will help to feed traffic more quickly into the local road system - what then? Jams will feed back onto the major roads and cause massive problems for both local and longer-distance motorists. GBC’s assessment of possible solutions to this is extremely superficial - it’s easy to write a few sentences promising infrastructure will follow but this is a real problem to which there won’t be an acceptable solution: a proper amount of infrastructure to cope with this amount of development will devastate the green belt and destroy the character of the area.

Your current document suggests (Appendix 11.4 of GBC Responses to Matters, Issues and Questions reference 003b) that the increase in morning traffic on the A247 Send Road will be just 3% - after adding nearly 40% to the housing stock of the village. Heaven only knows how anyone arrived at this figure, but you don’t need complex calculations to see that an estimate is out by an order of ten, as this is.

Attached documents:

**Comment:** MM44 - LPMM18/3776  **Respondent:** Nick Thomas 11005473  **Agent:**

*MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63*

This has been reinserted into plans at the last minute. The land is green belt, and the traffic will put pressure on already struggling infrastructure.

Attached documents:

**Comment:** MM48 - LPMM18/3780  **Respondent:** Nick Thomas 11005473  **Agent:**

*MM27 MM41 MM42 and MM48 / Transport Strategy*

Proposed changes to the A3 and the Clandon slip roads (document 003a, sections 11.14 to 11.34) will help to feed traffic more quickly into the local road system - what then? Jams will feed back onto the major roads and cause massive problems for both local and longer-distance motorists. GBC’s assessment of possible solutions to this is extremely superficial - it’s easy to write a few sentences promising infrastructure will follow but this is a real problem to which there won’t be an acceptable solution: a proper amount of infrastructure to cope with this amount of development will devastate the green belt and destroy the character of the area.

Your current document suggests (Appendix 11.4 of GBC Responses to Matters, Issues and Questions reference 003b) that the increase in morning traffic on the A247 Send Road will be just 3% - after adding nearly 40% to the housing stock of the village. Heaven only knows how anyone arrived at this figure, but you don’t need complex calculations to see that an estimate is out by an order of ten, as this is.

Attached documents:

**Comment:** MM40 - LPMM18/5963  **Respondent:** Joanne Graham 11005505  **Agent:**

*MM40 Policy A35: Former Wisley Airfield*
Whilst this Policy sets out a number of minor changes to Site Policy A35, it seems to completely miss the fact that the Secretary of State gave a robust refusal to planning permission for a similar development earlier this year (June 18). Please could you explain why the GBC have thus chosen to keep this site development within the local plan?

In providing his verdict the Secretary of state gave substantial weight to the harm which would be caused to the Green belt by this development. Further he stated that there would be massive impact to the road infrastructure, to the heritage assets, the character and appearance and the landscape including view from the Surrey Hills. Personally, I cannot see the difference in the development proposed by the “Wisley Property Investments Ltd.” and the proposal put forward by the GBC I thus do not see how you can keep Site A35 in your proposal. Please remove it immediately from the local plan and allow the Secretary of State’s decision to stand.

I would ask you to please consider and act appropriately to this feedback.

Attached documents:

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**Comment:** MM9 - LPMM18/5962  **Respondent:** Joanne Graham 11005505  **Agent:**

**MM9: Policy P2: Green Belt**

This policy appears to have been completely redrafted however no mention is made of the overall reduction in households from ONS. It is thus very concerning that the council plans to put 66% of the proposed housing on land which currently sits in Green belt land rather than looking to descale their proposals and protect this special space!

Further I would like to draw the Council’s attention to the “Exceptional circumstances” that are required to amend the Green Belt boundaries or the “Very special circumstances” necessary to justify any developments in the Green belt. In my opinion I do not see how the Council can claim that either of these can exist. It feels like the Council are simply looking for any easy way to build bulk housing. There are no special sets of circumstances that exist to justify building 66% of all housing in the Green belt! I believe the Council’s time would be much better spent re-examining policy S3 town centres where there is much more opportunity for development.

Attached documents:

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**Comment:** MM2 - LPMM18/3241  **Respondent:** James Culmer 11007393  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.
2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

Attached documents:
1. **I would like the Inspector to RE-EXAMINE the Local Plan because:**

2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high. Guildford's future housing requirements are being inflated by the fact that the town is fairly modest in size but has a large university population.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road. As Chairman of Governors at Clandon C of E Primary School which is on the A247 I am particularly concerned about the traffic on this road. There have been 3 instances of vehicles running off the road into the school's flint wall whilst I have been a governor.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247. As a resident of East Clandon living on The Street between the Queen's Head pub and the church, this is of particular concern to me and my family. East Clandon is also plagued by the inexplicable decision a few years ago to place the village on the official Surrey Cycle Route. As if this is insufficient torture for our residents we are also on the route of the annual Prudential cycle ride at the end of July/early August.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.

2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.

3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon C of E Primary School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

   **Attached documents:**

   **Comment: MM23 - LPMM18/3244**  
   **Respondent:** James Culmer 11007393  
   **Agent:**

   MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

   MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

   MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

   MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

   MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

   **Attached documents:**

   **Comment: MM23 - LPMM18/3252**  
   **Respondent:** James Culmer 11007393  
   **Agent:**

   MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/3242  Respondent: James Culmer 11007393  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM3 - LPMM18/3251  Respondent: James Culmer 11007393  Agent:

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/3245  Respondent: James Culmer 11007393  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:
Comment: MM32 - LPMM18/3246  Respondent: James Culmer 11007393  Agent: 

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/3247  Respondent: James Culmer 11007393  Agent: 

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/3248  Respondent: James Culmer 11007393  Agent: 

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/3249  Respondent: James Culmer 11007393  Agent: 

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/3250  Respondent: James Culmer 11007393  Agent: 

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/3243</th>
<th>Respondent: James Culmer 11007393</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM9 In Green Belt, proposed limited <strong>infilling outside identified settlement</strong> boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
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<th>Comment: MM41 - LPMM18/246</th>
<th>Respondent: Mrs Sandra Reeves 11008033</th>
<th>Agent:</th>
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<tr>
<td>I feel that increasing the number of proposed houses is completely excessive as this amounts to an increase of 37%. I do not understand why a total of 7000 objections to this proposal have been ignored. This infrastructure of Send cannot cope with such a development with at least 800 additional cars blocking up a already busy local roads and will make it impossible to travel around the area. Already the school and health centre are straining with existing numbers and will not be able to cope with such an extreme increase in local housing.</td>
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<th>Respondent: Mrs Sandra Reeves 11008033</th>
<th>Agent:</th>
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<tr>
<td>I object to this proposal which would be the largest new industrial allocation in any village in the borough. It will lead to the narrow local surrounding roads becoming gridlocked with nitrogen dioxide levels already at a dangerous level. There is no need for such an industrial site on Green Belt land when there is already unused space on the Slyfield site. There are also no special circumstances so it also contradicts MM9.</td>
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<td>I object to this development particularly given the fact that it was deleted from an earlier draft because of all the objections and not reinserted until the public examination in July. Not only will this development detract from the heritage buildings on Send Marsh Green but it will increase pressure on the Send Crossroads which is already extremely busy particularly during rush hours and school times. It is a Green Belt site with no special circumstances so it also contradicts policy MM9. Along with the other housing proposals for Send, it will add 770 houses to Send - an increase of 45% and we simply do not have the infrastructure to cope with such an increase.</td>
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<th>Respondent: Russell Pascoe 11008225</th>
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<td>MM27 MM41 MM42 and MM48 Transport Strategy</td>
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The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockharn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/1589  Respondent: Russell Pascoe 11008225  Agent:

I am writing to object to the local plan Main Modifications as outlined below:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

• An increase of 37% in the number of houses proposed is excessive
• 7000 objections to the previous lower number have been ignored
• It is Green Belt containing ancient woodland
• It will join up Send and Ripley and constitute over development
• The site is subject to frequent flooding and contaminated by lead shot
• At least 800 extra cars will block up the adjacent roads
• School and medical facilities will be strained to breaking point

Attached documents:

Comment: MM42 - LPMM18/1590  Respondent: Russell Pascoe 11008225  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockharn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/1594  Respondent: Russell Pascoe 11008225  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

• Since being deleted from the 2014 plan this has been increased twice, doubling the area
• It is by far the largest new industrial allocation in any village in the borough
• There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
• The Employment Land Needs Assessment showed a reduction in demand for industrial land
• This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Attached documents:

Comment: MM42 - LPMM18/1595  Respondent: Russell Pascoe 11008225  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/1591  Respondent: Russell Pascoe 11008225  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
• It is a Green Belt site with no special circumstances so it also contradicts policy MM9
• It will detract from the heritage buildings at Send Marsh Green
• The additional traffic will increase pressure on the Send Crossroads
• With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/1596  Respondent: Russell Pascoe 11008225  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:
MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

POLICY S2

The proposals as above when put together constitute an enormous increase in housing for a village such as Send. I understand however, that Barton Willmore has said the increase should be 431 which is a dramatically smaller number but which would still cause pressure on the present infrastructure.

MM2 MM42 MM48 Transport Strategy

These proposals are all quite out of proportion for Send. Anybody forced to travel at rush hours on these local roads will know all too well the delays are already totally unreasonable.

I wish to register my objections to the latest Development Plans for Send by Guildford Borough Council.
MM41  Land at Garlicks Arch, Send Marsh Policy A43  This is Green Belt land and now an even greater number of houses is proposed. Send has several areas subject to flooding, this is one of them, and for us living at an even lower level the risks would be increased. I understand the site has ancient woodland and this would be sacrificed. There is insufficient infrastructure for such an increase and Send’s traffic problems would be magnified.

Attached documents:

Comment: MM42  LPMM18/1296  Respondent: Sally Baker 11009825  Agent:

MM42  Land at Burnt Common, Send Policy A58  This is an enormous increase for a village such as Send and I understand that there are sites available at Slyfield which surely should be filled first before any proposal for Send is considered.

MM27  MM42  MM48 Transport Strategy  These proposals are all quite out of proportion for Send. Anybody forced to travel at rush hours on these local roads will know all too well the delays are already totally unreasonable.

Attached documents:

Comment: MM44  LPMM18/1293  Respondent: Sally Baker 11009825  Agent:

MM44  land at Alderton’s Farm, Send Marsh Road, Send Policy A63  Again this is Green Belt land. The additional traffic at both ends of Send Marsh Road will be a nightmare in rush hours. This road carries a great deal of through-traffic throughout the day and can be considered a rat-run. 120 homes with a probable 240 cars at least will cause even more problems. Insufficient infrastructure for this increase is yet another problem.

Attached documents:

Comment: MM48  LPMM18/1080  Respondent: Sally Baker 11009825  Agent:

MM27  MM42  MM48 Transport Strategy  These proposals are all quite out of proportion for Send. Anybody forced to travel at rush hours on these local roads will know all too well the delays are already totally unreasonable.

Attached documents:

Comment: MM9  LPMM18/1077  Respondent: Sally Baker 11009825  Agent:

MM9  Green Belt Policy. I am totally against any development of Green Belt land. I think it is important to keep our villages separate and continually eating at the outskirts with development will not do achieve this.

Attached documents:
MM13: The evidence base for retail need and usage in Guildford town centre is out of date and does not take account of current trends (i.e. online shopping). Part of the current (over)-allocation for retail usage in the draft Plan could be reallocated to providing sustainable housing. The conclusions in the Draft Plan are therefore unsound and the Examination should be reopened.

Attached documents:

MM2: The current draft Plan and Examination were drafted/conducted prior to release by ONS of the latest Population and Household formation statistics. This means that the “housing need” figures on which the Draft Plan is based and was examined are inaccurate and out of date, making the Draft Plan unsound. In fact, since the Draft Plans’ conception, the derivation of the “housing need” figures has been flawed, producing unrealistic figures out of all proportion to neighbouring councils. The Examination should therefore be reopened.

MM2: There should be no requirement for Guildford to take/provide for any un-met housing need from any other borough (including but not limited to Woking). Moreover, the current Draft Plan and Examination were drafted and conducted prior to release by ONS of the latest Population and Household formation statistics, meaning that the “housing need” figures on which the Draft Plan is based and was examined are inaccurate and out of date, rendering the Draft Plan unsound. The Examination should therefore be reopened.

Attached documents:

MM23, Policy D1: The requirement for the social dimension of sustainability (i.e. walking distances, pedestrian and cycle routes) should not be watered down, as this proposed amendment would do. Arbitrarily adjusting the requirements because it does not give the “right answers” is not acceptable; these requirements are there for good reasons.

Attached documents:
Proposal to exempt proposed Strategic Sites from design constraints: No development should be exempt from design constraints. They are there for a reason and as such, any proposed exemptions are completely unacceptable. The Draft Plan is therefore unsound and the Examination should be reopened.

Failure of the Examination to take account of recent relevant case-law: The Examination failed to take account of recent relevant case-law, for example, that of the Court of Justice of the European Union in *People over Wind*. The Draft Plan is therefore unsound and the Examination should be reopened.

S3: The town centre policy is inadequate and does not address the infrastructure deficit.

Site A35, the Former Wisley Airfield/Three Farms Meadows

In addition to the above, I object to the following:

Failure to conduct an Appropriate Assessment or a Habitat’s Regulation Assessment: Guildford Borough Council has failed to conduct/ensure that such assessments have been conducted in respect of the Former Wisley Airfield/Three Farms Meadows. This is a breach of applicable case-law. The continued inclusion of Site A35 in the Draft Plan is therefore. The Draft Plan is therefore unsound and the Examination should be reopened.

Failure to take into account the fact that the whole of the Former Wisley Airfield/Three Farms Meadows is a Site of Nature Conservation Interest: The proposed development will destroy the bio-diversity of the SNCI. The continued inclusion of Site A35 in the Draft Plan is therefore unsound. The Draft Plan is therefore unsound and the Examination should be reopened.

MM47 Proposal to reduce the size of the SNCI: The whole of the Former Wisley Airfield/Three Farms Meadows is a Site of Nature Conservation Interest. There is no justification for the proposal to significantly reduce the size of the SNCI. The continued inclusion of Site A35 in the Draft Plan is therefore unsound. The Draft Plan is therefore unsound and the Examination should be reopened.

Addition of new land to the south of the appeal site: This land abuts the Ockham Conservation Area, and increases the visibility of any development on the Former Wisley Airfield/Three Farms Meadows to/from the Surrey Hills ANOB. The continued inclusion of Site A35 in the Draft Plan is therefore unsound. The Draft Plan is therefore unsound and the Examination should be reopened.

Addition of new land to the south of the appeal site: Development on much of this “new” land is constrained by the VOR. The inclusion of this new land therefore fails to mitigate the density of the proposed development, which remains objectionable and unacceptable and totally inappropriate for the location. The continued inclusion of Site A35 in the Draft Plan is therefore unsound. The Draft Plan is therefore unsound and the Examination should be reopened.
7  **MM41**: The proposed Transport Strategy relies on inadequate modelling and takes no account of the delay in Highways England’s RIS scheme, which is currently two years and rising. This never ending delay will impact and make unworkable any proposed development reliant on that RIS scheme, including that proposed for the Former Wisley Airfield/Three Farms Meadows (Site A35). The Draft Plan is therefore unsound and the Examination should be reopened.

**Comment:** MM41 - LPMM18/5681  **Respondent:** Stephen Gill 11010945  **Agent:**

8  **A3 Improvements**: There is too much reliance on A3 (Guildford) improvements that are beyond Guildford Borough Council’s control and have no fixed timescale.

**Comment:** MM44 - LPMM18/5675  **Respondent:** Stephen Gill 11010945  **Agent:**

5  **Proposal for another 500 houses in Send, in the Green Belt**: Please see objection in statement 1. Please also note that these proposed houses will be car-dependent, and accordingly, the proposed development would not be sustainable development. Further, no account appears to have been taken of the impact of the increased volume of traffic that such development would have on the Portsmouth Road, Ripley, or on the surrounding local lanes and narrow roads. The Draft Plan is therefore unsound and the Examination should be reopened.

**Comment:** MM27 - LPMM18/1402  **Respondent:** Mrs Janet Williams 11011041  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

Changes to the A3 slip road will in no way make up for the increased traffic that will be generated by all the planned developments. In fact it is far more likely to make the situation worse. What assessments have been done to predict the actual changes in traffic that will occur as the result of the planned developments?

**Comment:** MM41 - LPMM18/1395  **Respondent:** Mrs Janet Williams 11011041  **Agent:**

550 homes in this area would put an unacceptable burden on the existing infrastructure. At the moment Send Road and the A3 are frequently at a standstill because of the volume of traffic. To travel south to Guildford on the A3 in the evenings can take over an hour to travel 10 miles. To get into Woking on the A247 in the mornings can take 45 minutes crawling in heavy traffic. It is sheer madness to add more traffic to any of the roads in this area.
The local doctors surgery and school are already struggling they are just not going to be able to cope with an increase in numbers. To increase the number of houses from 400 to 550 at Garlicks Arch indicates that all our previous comments have been totally ignored. The village of Send is being expected to take on far more than its fair share of developments.

Garlicks Arch development is on Green Belt and it is difficult to see why this development constitutes special circumstances when there are still many brownfield sites undeveloped in Surrey.

Attached documents:

Comment: MM41 - LPMM18/4928  
Respondent: Mrs Janet Williams  11011041  
Agent: MM41 Land at Garlicks Arch, Send Marsh, Policy A43

*Increased from 400 to 550 homes of which 450 to be built in the first five years*

If the original plan to build 400 houses was not acceptable to many so an increase to 550 houses is just an outrage and makes a mockery of the planning process. The roads in the village of Send and the surrounding area are inadequate with the present weight of traffic. There are frequently long delays getting in and out of the village to get to Woking on the A247 and to Guildford on the A3. Send Primary school, situated on the A247, necessitates heavy traffic and creates parking issues. An increase in traffic along this road will worsen the situation and make it even more dangerous for those trying to walk to school with their children. There is no evidence that the planned changes to the roads will make any difference at all. Equally the schools, doctors’ surgery, wifi/broadband will be unable to accommodate all the developments planned in the village. The increase in traffic will cause even more air pollution.

There is no justification to erode the Green Belt in this area in such a blatant and damaging way.

Attached documents:

Comment: MM41 - LPMM18/4938  
Respondent: Mrs Janet Williams  11011041  
Agent: MM42 and MM48 Transport Strategy

MM41 Land at Burnt Common, London Road, Send, Policy A58

*Increased from 7000 to a minimum of 14,800 sq m of industrial and storage*

Changes to the A3 slip road will in no way make up for the increased traffic that will be generated by all the planned developments. In fact it is far more likely to make the situation worse. What assessments have been done to predict the actual changes in traffic that will occur as the result of the planned developments?

Attached documents:

Comment: MM42 - LPMM18/4929  
Respondent: Mrs Janet Williams  11011041  
Agent:
Again the roads in and around the village will be unable to cope with this development. Industrial traffic tends to be heavier than domestic so not only will it cause jams, create more air pollution but it is also likely to damage the roads and the underlying, aged sewage pipes.

Why is Send being targeted with such a huge allocation of industrial development compared with all other villages in the borough when the Employment Land Needs Assessment showed a reduction in demand?

To add insult to injury this development is once again on Green Belt when there are absolutely no ‘special circumstances’ to develop new industrial sites when brownfield sites exist in the borough.

Attached documents:

**Comment:** MM42 - LPMM18/4941  **Respondent:** Mrs Janet Williams 11011041  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

Changes to the A3 slip road will in no way make up for the increased traffic that will be generated by all the planned developments. In fact it is far more likely to make the situation worse. What assessments have been done to predict the actual changes in traffic that will occur as the result of the planned developments?

Attached documents:

**Comment:** MM44 - LPMM18/1401  **Respondent:** Mrs Janet Williams 11011041  **Agent:**

Additional houses mean additional traffic on already busy village roads. Send Road is frequently at a standstill at peak times.

There are no 'special circumstances' why Green Belt should be developed in this area.

This development is one of several that will add 770 more houses in Send. This is totally unacceptable. It will change the entire nature of this village.

Attached documents:

**Comment:** MM44 - LPMM18/4931  **Respondent:** Mrs Janet Williams 11011041  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63**

*New site for 120 homes including some self-build*

All my objections to MM41 also apply to MM44. In total these developments would increase the houses in Send by 45%. How can the village infrastructure possibly cope with such growth.

Attached documents:
MM27 MM41 MM42 and MM48 Transport Strategy

Changes to the A3 slip road will in no way make up for the increased traffic that will be generated by all the planned developments. In fact it is far more likely to make the situation worse. What assessments have been done to predict the actual changes in traffic that will occur as the result of the planned developments?

Attached documents:

1. MM9 Green Belt Policy

The ‘modifications’ claim to protect the Green Belt but it allows infilling outside the current settlement boundaries where it can be shown that the site could be considered to fall within the village. This is a very vague statement that has no teeth. It gives no firm protection at all but will leave the Green Belt open to gradual erosion.

Attached documents:

MM13 There is too much allocation for retail use in the town centre. The evidence base used for retail demand is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing.

Attached documents:

WISLEY AIRFIELD PLANNING - OBJECTION

I am writing to object to the current proposal by GBC re the use of Wisley Airfield for housing. The following points need to be considered:

GENERAL

- MM2 The housing target is wrong. The hearing should be reopened so that the latest ONS figures and household projections can be taken into account.
- MM2 There should be no requirement for Guildford to take Woking’s unmet housing need, particularly as this will require further green belt release.
- The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt.
The addition of another 500 houses in Send (which will be car dependent) would have a severe detrimental impact on Portsmouth Road in Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/3339  
Respondent: Hannah Earle 11011297  
Agent:  

MM23 (Policy D1)  
Reduces the requirement for the social dimension of sustainability (e.g. walking distances and pedestrian and cycle routes)  
Strategic sites are to be exempt from design constraints.  
There is no evidence that recent case law such as “People over Wind” has been taken into account.

Attached documents:

Comment: MM3 - LPMM18/3340  
Respondent: Hannah Earle 11011297  
Agent:  

S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/3341  
Respondent: Hannah Earle 11011297  
Agent:  

SITE SPECIFIC – A35 – Three Farms Meadows  
The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR.  
Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.

Attached documents:

Comment: MM41 - LPMM18/3338  
Respondent: Hannah Earle 11011297  
Agent:  

MM41  Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years, which will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43–Garlicks Arch; MM44 – Aldertons Farm].
There is too much reliance on the A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Comment: MM50 - LPMM18/3342  Respondent: Hannah Earle 11011297  Agent:

MM47 The size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed, which is in breach of case law.

I look forward to receiving confirmation of receipt of my objection.

Comment: MM9 - LPMM18/3336  Respondent: Hannah Earle 11011297  Agent:

MM9 Infilling in and around villages will result in the weakening of protection of the countryside.

Comment: MM27 - LPMM18/906  Respondent: Mary Warren 11011713  Agent:

Transport

Modifications MM27, MM41, MM42, MM48.

As before, there appears to be no clear plan for transport links or other facilities such as schools and medical facilities, just fine words. Without such a document, the local plan is useless and will only lead to chaos and gridlock on the roads and impossible class sizes in our schools. Already, the roads around Send, Ripley and West Clandon are overloaded with enormous European sized lorries which rumble through the villages with no thought given to parked cars or pedestrians, mounting the pavements if they meet a lorry coming the other way. In addition, they emit considerable diesel fumes, risking the health of the children in the schools, at least two of which are very close to the road.

Comment: MM41 - LPMM18/910  Respondent: Mary Warren 11011713  Agent:
Proposed Housing.

Modification MM41 Garlicks Arch

550 houses are now proposed, an increase of 150 from the previous plan. The objections to this building have been made before. Garlicks Arch is Green Belt Land with an area of ancient woodland, the ground of which is subject to flooding and contains lead shot, a potential health hazard. Building here cannot be considered 'limited infilling' as it is not within a village but rather separates Send, West Clandon and Ripley. The result of building so many houses on this land will be that the 3 villages will merge into one and become yet another sprawling housing estate.

There is no clear plan for allowing road access to these houses. The suggestion is that they will exit on to the A247. Inevitably, this exit would be very close to the A3 junction and the Burntcommon roundabout. (The plan talks about the Sendmarsh roundabout which doesn't exist. I assume they mean the Burntcommon roundabout). As it is possible that as many as 800 extra cars may be involved, this is asking for travel chaos and accidents!!

Transport

Modifications MM27, MM41, MM42, MM48.

As before, there appears to be no clear plan for transport links or other facilities such as schools and medical facilities, just fine words. Without such a document, the local plan is useless and will only lead to chaos and gridlock on the roads and impossible class sizes in our schools. Already, the roads around Send, Ripley and West Clandon are overloaded with enormous European sized lorries which rumble through the villages with no thought given to parked cars or pedestrians, mounting the pavements if they meet a lorry coming the other way. In addition, they emit considerable diesel fumes, risking the health of the children in the schools, at least two of which are very close to the road.

Attached documents:

Comment: MM42 - LPMM18/908  Respondent: Mary Warren 11011713  Agent:

Transport

Modifications MM27, MM41, MM42, MM48.

As before, there appears to be no clear plan for transport links or other facilities such as schools and medical facilities, just fine words. Without such a document, the local plan is useless and will only lead to chaos and gridlock on the roads and impossible class sizes in our schools. Already, the roads around Send, Ripley and West Clandon are overloaded with enormous European sized lorries which rumble through the villages with no thought given to parked cars or pedestrians, mounting the pavements if they meet a lorry coming the other way. In addition, they emit considerable diesel fumes, risking the health of the children in the schools, at least two of which are very close to the road.

Attached documents:

Comment: MM44 - LPMM18/912  Respondent: Mary Warren 11011713  Agent:

Proposed industrial space

Main Modification MM44
There is no real explanation as to why there has been an increase in the allocation of industrial space at Burntcommon. The local plan talks about updates to the Employment Land Needs Assessment but doesn't say what they are. My understanding is that ELNA has shown a reduction in demand for industrial land, not an increase. There is already proposed expansion of the Send Business Centre. Why do we need further expansion of Burntcommon as well, particularly as there is spare capacity at Slyfield which is not in the Green Belt unlike Burntcommon. Once again, the transport links have not been fully discussed. The narrow roads around the area are completely unsuitable for heavy lorries and any increase in their number will end up blocking the roads and causing traffic chaos.

In conclusion, this latest local plan does nothing to maintain Send as a village. Its boundaries will be eroded by 'limited infilling' till they meet those of the adjacent villages and could even extend to Guildford itself and possibly to Woking. We will have an unattractive sprawl of housing and industrial sites with cars and lorries pumping out noxious fumes on narrow inadequate roads, driving away residents and damaging children's lungs. As I have asked before, is this really what they want?

**Proposed Housing**

Modification MM44 Alderton's Farm.

Like Garlicks Arch, this land is within the Green Belt. It separates Send and Send Marsh, allowing each to preserve their own character. There are no special circumstances to suggest it can be taken out of the Green Belt nor can building on it be considered 'limited infilling' as it has no close neighbours. There must have been some reason why this was deleted from an earlier plan and not re-instated until July. This reason still stands.

**Attached documents:**

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**Comment:** MM48 - LPMM18/909  **Respondent:** Mary Warren  **Agent:**

**Transport**

Modifications MM27, MM41, MM42, MM48.

As before, there appears to be no clear plan for transport links or other facilities such as schools and medical facilities, just fine words. Without such a document, the local plan is useless and will only lead to chaos and gridlock on the roads and impossible class sizes in our schools. Already, the roads around Send, Ripley and West Clandon are overloaded with enormous European sized lorries which rumble through the villages with no thought given to parked cars or pedestrians, mounting the pavements if they meet a lorry coming the other way. In addition, they emit considerable diesel fumes, risking the health of the children in the schools, at least two of which are very close to the road.

**Attached documents:**

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**Comment:** MM9 - LPMM18/905  **Respondent:** Mary Warren  **Agent:**

Once again, I was astonished to read the latest version of the local plan. Despite the huge number of objections, there has been an increased allocation of houses and industrial space for what is, after all, just a village. Guildford Borough Council has claimed that their housing need is 789 new houses per year. (Policy S2). I understand that independent bodies, including the Office for National Statistics, suggest that the need is far lower - between 350 - 450. So why is Send singled out for another 770 houses - an increase of 45% - and an increase in the industrial sites?

**Green Belt**
Main Modification MM9

There is a new test for determining whether the Green belt can be ignored. This is a very subjective one which states 'limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.' It will be all too easy to say that areas of Green Belt are so close to a village as to be considered within it, when the idea of the Green Belt is to prevent urban sprawl and to maintain the individual identity of the villages.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM13 - LPMM18/3371</th>
<th>Respondent: Geraldine Wright 11014369</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing</td>
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<th>Comment: MM2 - LPMM18/3369</th>
<th>Respondent: Geraldine Wright 11014369</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>I write to request the examination in public of the GBC to enable the latest Office of National Statistics to be used. Up until now I was not aware of this consultation and I would like to support the representations made by WAG which I understand to have been written with advice from Richard Harwood QC. I would also query why I was not made aware of this consultation after I have commented previously on the Local Plan.</td>
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In essence I would like to object on the following basis

**GENERAL**

• The MM2 housing target is flawed. The hearing must be reopened so that the latest ONS figures and household projections can be taken into account
• MM2 - There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

**Attached documents:**

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<th>Comment: MM23 - LPMM18/3373</th>
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<td>• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (e.g. walking distances and pedestrian and cycle routes)</td>
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• Strategic sites are to be exempt from design constraints There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/3374  Respondent: Geraldine Wright 11014369  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/3375  Respondent: Geraldine Wright 11014369  Agent:

SITE SPECIFIC – A35 – Three Farms Meadows

• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR
• Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
• MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
• The biodiversity of the SNCI will be destroyed by the proposed development.
• An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

Attached documents:

Comment: MM41 - LPMM18/3372  Respondent: Geraldine Wright 11014369  Agent:

• MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].
• There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM9 - LPMM18/3370  Respondent: Geraldine Wright 11014369  Agent:

• MM9 – infilling in and around villages will result in the weakening of protection of the countryside
Comment: MM2 - LPMM18/4290  Respondent: Mr David Howells 11015745  Agent:

Local Plan: Consultation on Modifications

I refer to the proposed modifications to the Local Plan recently published by Guildford Borough Council and have the following concerns which I would ask the Council/Planning Inspector to address before taking the Plan further.

Policy MM2

The housing need is stated to be 630 dwellings per annum for Guildford with a further 42 per annum to take up the shortfall from the plans put in Woking Borough Council. My understanding is that the figure for Guildford exceeds the figures which would be derived from the latest data from the Office for National Statistics and the new Government formula. In particular, it overstates the number of homes required for the student population and inflates the housing requirement by assuming a pessimistic rate of local economic engagement by residents.

Neil MacDonald, the expert advising Guildford Residents Association, has demonstrated that about 360 homes a year would support the economic growth rate proposed by the Inspector.

I am concerned that the Council, and/or the Inspector, use the most up to date data as the basis for the Local Plan and consider Neil MacDonald’s conclusions very carefully before finalising the plan. A lower housing need could lead to at least one of the Green Belt areas being preserved to improve the quality of life for all those who live and/or work in Guildford.

It also seems perverse for Guildford to take up the slack in Woking’s Local Plan, when it results in Guildford sacrificing Green Belt land to housing development from out of area. I would also question whether Woking’s needs have been re-assessed (as Guildford’s should be) to determine whether their housing needs are still as they were when their plan was submitted.

Attached documents:

Comment: MM35 - LPMM18/4292  Respondent: Mr David Howells 11015745  Agent:

Policy MM35

If the housing need is reduced as proposed under my comments in MM2 above, there is arguably no need for a development at Gosden Hill at all. The visually welcoming Green Belt land on the Northern entrance to Guildford would therefore be preserved.

In the event that the Gosden Hill Green Belt land is surrendered to development I remain concerned about the proposed access to the new development. In particular the phrase ‘Deliberative process of consideration to be undertaken as part of the development management process…’ is horrendously vague and/or meaningless. Before any development is permitted, the developer and/or Surrey Highways must have agreed to construct a new four way access road from the A3 to the site to be completed at the same time as any first phase development. Any development there is otherwise unsustainable. It would also be a missed opportunity to improve the road infrastructure to the North of Guildford and improve traffic safety on the A3.

Attached documents:
MM27 – MM41 – MM42 – MM48 – I object on the following grounds

Already congestion exists in Send at rush hours mainly with people travelling into Woking etc and at school drop off and pick up times. Are the proposed changes to the A3 really going to improve this – I don’t think so. This causes delays – pollution and gridlock.

Attached documents:

Comment: MM41 - LPMM18/628  Respondent: Brenda Tulloch 11016001  Agent:

MM41 – I object on the following grounds

I object to the amount of houses proposed on this site – 550 houses will mean too much traffic for the area – which is already bad during rush hours – the impact for the school and doctors who could not possibly cope with all the additional people this would involve.

7000 objections on previous occasions have been ignored.

This is green belt land and when its gone it will be gone forever – this was designated green belt land many years ago and no one should have the right to alter this now.

This site is subject to frequent flooding and contamination.

Proposal for 770 houses to be built in Send with 1700 currently is just too much.

Attached documents:

Comment: MM41 - LPMM18/632  Respondent: Brenda Tulloch 11016001  Agent:

MM27 – MM41 – MM42 – MM48 – I object on the following grounds

Already congestion exists in Send at rush hours mainly with people travelling into Woking etc and at school drop off and pick up times. Are the proposed changes to the A3 really going to improve this – I don’t think so. This causes delays – pollution and gridlock.

Attached documents:

Comment: MM42 - LPMM18/633  Respondent: Brenda Tulloch 11016001  Agent:

MM27 – MM41 – MM42 – MM48 – I object on the following grounds
Already congestion exists in Send at rush hours mainly with people travelling into Woking etc and at school drop off and pick up times. Are the proposed changes to the A3 really going to improve this – I don’t think so. This causes delays – pollution and gridlock.

**Attached documents:**

**Comment: MM42 - LPMM18/635  Respondent: Brenda Tulloch 11016001  Agent:**

**MM42 – I object on the following grounds**

This proposal has doubled in size from previously.

There is no need to put this on green belt as there is sufficient space at Slyfields

Narrow surrounding roads will be gridlocked and cause even more pollution.

**Attached documents:**

**Comment: MM44 - LPMM18/629  Respondent: Brenda Tulloch 11016001  Agent:**

**MM44 – I object on the following grounds**

This has suddenly been re-inserted after being deleted from earlier draft due to objections – so why is it allowed to be reconsidered now.

This is green belt land and when its gone it will be gone forever – this was designated green belt land many years ago and no one should have the right to alter this now. Contradicts policy MM9

Additional traffic at Send traffic lights – additional school places will be needed and increased load on the doctors surgery.

**Attached documents:**

**Comment: MM48 - LPMM18/634  Respondent: Brenda Tulloch 11016001  Agent:**

**MM27 – MM41 – MM42 – MM48 – I object on the following grounds**

Already congestion exists in Send at rush hours mainly with people travelling into Woking etc and at school drop off and pick up times. Are the proposed changes to the A3 really going to improve this – I don’t think so. This causes delays – pollution and gridlock.

**Attached documents:**
Comment: MM9 - LPMM18/630  Respondent: Brenda Tulloch 11016001  Agent:

**MM9 – I object on the following grounds**

The green belt should not be built on except in very special circumstances – there are plenty of brown fill land around which could be used. I understand that this would be more expensive – but we can never get the green belt land back again when it has been developed. We should be thinking of future years for our children and grandchildren – and not just currently.

**Attached documents:**

---

Comment: MM40 - LPMM18/2966  Respondent: Carol Cordrey 11023329  Agent:

I continue to be a resident of Ockham after 36 years and I wish to register my objections to the local plan for THREE FARM MEADOWS:–

1. Current and new evidence demands that the examination of this site/development is re-opened.
2. With the current expansion of RHS WISLEY there will be a huge increase in vehicles around Ockham, A3 and M25.
3. Delays to improvements of the M25 / J10 will worsen all traffic problems already evaluated.
4. You must consider the EU Advocate General's view on mitigation.
5. New ONS statistics indicate REDUCED HOUSING will be required in the area.
6. Additional land has been attached to the south of the site but without the full, usual public consultation.
7. Removing the site from the larger GREEN BELT the SOS GB objection is overcome but ALL the other issues/problems remain.
8. A public examination needs to be instigated to take account of new information from the Office of National Statistics.
9. Please note my profound support for the objections made on my behalf by WAG, all of which were written with advice from Richard Harwood QC.

**Attached documents:**

---

Comment: MM41 - LPMM18/4065  Respondent: Trevor Pound 11023489  Agent:

With respect to MM41 Land at Garlick’s Arch, Send Marsh, this is more unjustifiable seizure of Green Belt Land, which local residents have previously objected to. Despite this an increase in the level of build is now proposed! At 550 homes, this is completely out of scale with Ripley and Send villages, which it would effectively join together, with even more damage to the local environment and pressure on already stretched infrastructure as above. This would be a complete new village in itself; although, doubtless, houses will all be identical so in appearance will look more like a characterless state.
<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/4067</th>
<th>Respondent: Trevor Pound 11023489</th>
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<tr>
<td>With respect to MM42, I am receptive to ideas that support local employment although how much modern, automated warehouses would do this is open to question. Again, however, I am concerned that Green Belt land is targeted for this purpose. I am sure that if the council did an audit of local industrial property, it would find plenty of unused sites, not least at Slyfield. This proposal met stiff opposition in the past and I am troubled that this should be blatantly ignored with the council now coming forward with a much larger development of 14.8k sq m.</td>
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<td>I am responding to the public consultation on the latest iteration of the Guildford Local Plan as it relates to Send. With respect to MM44 (Land at Alderton’s Farm, Send Marsh Road), this is Green Belt Land so I can see no justification for development on this scale, if at all. Send Marsh Green is a particularly attractive corner of Send and a large development would detract from its character. Neither would local roads, which already easily clog eg the turning from Send Marsh Road onto the Portsmouth Road or Send crossroads, easily accommodate increased traffic levels. I am not sure how other infrastructure would cope either such as the availability of school places or adequate medical services.</td>
<td></td>
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</tbody>
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| Attached documents: |

<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/4066</th>
<th>Respondent: Trevor Pound 11023489</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>With respect to MM9 and the Green Belt in general, I am adamantly against dismantling the protection to our communities provided by the Green Belt in large developments or by a thousand cuts as would be the result of accepting the wording proposed covering “limited infilling”. This protection is more necessary now than ever if the whole of the area is not to just become an urban outpost of Woking. I believe the villages and open spaces of Surrey are valued equally by people living in the bigger towns in the way that parks are valued by people living in cities; they do not want to see the wanton destruction of the countryside. With the current outcome of Brexit still up in the air and general wider economic uncertainties, I think now is a particularly bad time to commit to large scale building, particularly at the cost of Green Belt land.</td>
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| Attached documents: |

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/1839</th>
<th>Respondent: Jean Walker 11023585</th>
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<td>Ref: Guildford Borough Council’s Modified Local Plan consultation</td>
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I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

Attached documents:

Comment: MM2 - LPMM18/1841  Respondent: Jean Walker 11023585  Agent:

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/1844  Respondent: Jean Walker 11023585  Agent:
MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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**Comment**: MM23 - LPMM18/1852  **Respondent**: Jean Walker 11023585  **Agent**:  

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment**: MM3 - LPMM18/1842  **Respondent**: Jean Walker 11023585  **Agent**:  

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

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**Comment**: MM3 - LPMM18/1851  **Respondent**: Jean Walker 11023585  **Agent**:  

1. The Guildford Vision Group’s Objections and Concerns Which I Share
MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/1845  
Respondent: Jean Walker 11023585  
Agent: MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/1846  
Respondent: Jean Walker 11023585  
Agent: MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/1847  
Respondent: Jean Walker 11023585  
Agent: MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/1848  
Respondent: Jean Walker 11023585  
Agent: MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.
MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

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Comment: MM41 - LPMM18/1849  Respondent: Jean Walker 11023585  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

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Comment: MM44 - LPMM18/1850  Respondent: Jean Walker 11023585  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

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Comment: MM48 - LPMM18/1840  Respondent: Jean Walker 11023585  Agent:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of...
congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
9. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

**Attached documents:**

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**Comment:** MM9 - LPMM18/1843  **Respondent:** Jean Walker 11023585  **Agent:**

I object to this amendment because given current shopping trends and the decline in the “High Street” there is far too much allocation for retail use in the town centre. The retail allocation should be put to better use, i.e. providing sustainable housing.

**Attached documents:**

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**Comment:** MM13 - LPMM18/4245  **Respondent:** Nik Proctor 11023969  **Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development

**Attached documents:**

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**Comment:** MM2 - LPMM18/4242  **Respondent:** Nik Proctor 11023969  **Agent:**

I object to an amended plan for which the housing target out of date and based on incorrect information. The latest ONS statistics show a much reduced demand for housing and this needs to be reflected in the plan and on its own removes the requirement for Guildford to meet Woking’s housing shortfall.
The council has turned its own spatial strategy on its head and instead of concentrating on Brownfield sites in Guildford Town Centre where the big landowners like Network Rail, Legal and General and Guildford Corporation would be more than happy to realise the increase the value of that a change to residential use would bring. Building in the Green Belt and rural areas should be a last resort.

The addition of another 500 houses in Send (which will be car dependent) will have a severe impact on Portsmouth Road Ripley, and the A3 and there is no indication that this has been given proper consideration.

Attached documents:

**Comment:** MM23 - LPMM18/4250  **Respondent:** Nik Proctor 11023969  **Agent:**

I object to (Policy D1) which dilutes the requirement for the social dimensions of sustainability (e.g. walking distances and pedestrian and cycle routes) and the fact that strategic sites are to be exempt from design constraints, which I consider to be a “developers charter” and abdicates GBC’s responsibility for development control to the detriment of adjoining owners and residents.

Attached documents:

**Comment:** MM27 - LPMM18/4253  **Respondent:** Nik Proctor 11023969  **Agent:**

I object to the fact that the proposed Transport Strategy places far too much reliance on infrastructure improvements some of which are uncertain and all of which are beyond the council’s control and have no fixed timescale. There is already a 2 year delay on Highways England RIS scheme for J10 of the M25 and this has a direct effect on the development of Site A35 – TFM; Site A43– Garlicks Arch; and Site MM44 – Aldertons Farm].

Attached documents:

**Comment:** MM3 - LPMM18/4243  **Respondent:** Nik Proctor 11023969  **Agent:**

Policy S3

I object to the fact that the town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

**Comment:** MM40 - LPMM18/4240  **Respondent:** Nik Proctor 11023969  **Agent:**

I object to the Council unilaterally removing the Wisley Airfield Site from the Green Belt they have no mandate from the people of Guildford and Surrey to do this.
The only reason for this dubious manoeuvre is to undermine the Secretary of State for the Environment’s decision that the Wisley Airfield development “would represent inappropriate development in the Green Belt, and should not be approved except in very special circumstances” and to try to get around the fact that the provision of housing is not an “exceptional circumstance.”

It is also illogical that GBC should take this action given that they unanimously supported the refusal of the original application, and because the conservative members stated in their election manifesto that they would not build on green belt land.

I also object to the Council’s failure to communicate adequately with residents about the current amendments to the Local Plan under the guise of compliance with GPDR. All the 32,000 or so persons who responded to the plan in 2016 should have been given the opportunity respond this time and not to have done so is a clear and unilateral disenfranchisement.

Attached documents:

Comment: MM40 - LPMM18/4254  Respondent: Nik Proctor 11023969  Agent:

Amendment MM47

I object to the fact that the size of the SNCI has been drastically reduced. The whole site qualifies on ecological grounds and there is no valid justification for altering the SNCI boundary. The biodiversity of the SNCI will also be destroyed by the proposed development.

SITE SPECIFIC – A35 – Three Farms Meadows

I object to the amendments relating to this site as follows:

1. The addition of land to the south of the appeal site does not mitigate the density issue as much as it appears to on the plan as building is not permitted within a certain radius the Ockham VOR (vhf omni-directional range) air traffic control beacon).

2. The land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.

3. In breach of case law an Appropriate Assessment and a Habitats Regulation Assessment have not been completed.

Attached documents:

Comment: MM9 - LPMM18/4244  Respondent: Nik Proctor 11023969  Agent:

I object to the reliance on “infilling” in and around villages, which is overdone and will result in the weakening of protection of the countryside.

Attached documents:
Comment: Other comments - LPMM18/4241  Respondent: Nik Proctor 11023969  Agent: 

Due to the inadequacies and shortcomings listed above and the fact that so many people have been excluded from this consultation I hereby call for the examination in public be re-opened.

Attached documents:

Comment: MM2 - LPMM18/4848  Respondent: Sue Edwin 11024097  Agent: 

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and request that their responses are registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. There remain brownfield development opportunities, especially in the town centre, that have not been fully or properly exploited;
   3. There is far too much reliance by the Council on purported A3 improvements which are beyond the council’s control and subject to modification and/or cancellation irrespective of the developments that may be undertaken based on such bare promises;
   4. The town centre policy, S3, is inadequate and does not address the infrastructure deficit; and
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’ as required by the NPPF.

1. I request that the Inspector RE-EXAMINES the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt;
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number on which the Local Plan is predicated is excessive; and
   4. Guildford Borough Council has failed adequately to notify or consult on its proposed changes, by comparison with the widely communicated consultation of the original version of the proposed Local Plan.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

The A247 is a minor A road that was so-classified many years ago before traffic loads, vehicle sizes and axle loads were anywhere near the specifications of the current day. As such, the current designation of the A247 is unsuitable to cope with the existing traffic requirements, let alone any increase as would be generated by the proposed developments according to the modified Local Plan. In short, the A247 IS NOT FIT FOR USE AS AN A ROAD AS IT STANDS, AND MOST CERTAINLY CANNOT WITHSTAND ANY SIGNIFICANT INCREASE IN TRAFFIC FLOWS.

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send, which is simply unsustainable. In the previous consultation, the Clandon Society, myself and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.
The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g., through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition provided in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, recognition of the problem is merely wind if not coupled with well-considered and adequately funded provision for mitigating such problems. The suggested £1 million of developer-funded mitigation measures for the A247 through West Clandon, which may or may not be enforceable, will not change the fact that the A247 through West Clandon does not have the capacity, nor physical characteristics, to deal with the increase in traffic that will be generated by the proposed developments.

The capacity of the existing road cannot realistically be increased because of existing physical constraints including the close proximity to the road of listed structures and other buildings and the limited width available.

The road is already too busy to cross on foot at times during the morning peak, creating problems in accessing the station. In a few years’ time, if the proposed developments proceed, the traffic will become nose-to-tail heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements, leading to near misses with pedestrians and frequent accidents with vehicles, as have been notified previously by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative, modern A road classified route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could properly divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge and it is already the intention to build a station next to the bridge. This would seem to be a far preferable and achievable solution to the likely over-capacity of the A247.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic;
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247;
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6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3;
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9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments; and
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e., through West Clandon village) during the a.m. assessment period.
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2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still frequently in excess of 30mph;
3. The dangerous junction with the station roads and Oak Grange Road, where the exit sight lines to the North and/or South are limited by the hump and parapet of the bridge over the railway and are the locations of frequent near misses such that it is only a matter of time before a serious accident occurs. The visibility of traffic emerging from the station roads and Oak Grange Road is also poor for traffic approaching the bridge from the North or South, respectively, because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station. In addition, particularly out of peak traffic periods, traffic speeds frequently far exceed the designated 30mph limit;
4. The sight lines for the exit of the Onslow Arms car park;
5. The narrowness of the road near Summers;
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement and/or causing near misses of even clashes of wing mirrors;
7. The sharp bend near Clandon Regis;
8. The narrowness of the road at the Bull’s Head;
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school;
10. The sharp bend with poor sight lines in either direction at the church;
11. No continuous footpath through the length of the village;
12. The frequently over-limit speed of traffic; and
13. The classification as an A-road without it having the capability of an A-road, rather a B-road at best.

Housing Number and the Green Belt

- The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.
- The Council has long argued that much of the housing required must be built on such sites.
- This argument is not supported either by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
- The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
- Coupled with modal shift, these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

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   MM2: There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   MM2: Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   MM2: It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.
MM2: Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/4852  Respondent: Sue Edwin 11024097  Agent:

MM23: In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23: (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23: Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23: If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23: should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4860  Respondent: Sue Edwin 11024097  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is entirely unsound and should be re-examined, reconsidered and amended to take into account a sprinkling of common sense.

Attached documents:

Comment: MM3 - LPMM18/4849  Respondent: Sue Edwin 11024097  Agent:

MM3: In (5) new town centre development should avoid adverse impact on surrounding residential areas.
MM3: There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/4853  Respondent: Sue Edwin 11024097  Agent:

MM31: on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31: A height limit for North Street is required.

MM31: There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4854  Respondent: Sue Edwin 11024097  Agent:

MM32: A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4856  Respondent: Sue Edwin 11024097  Agent:

MM33: should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:
**Comment: MM35 - LPMM18/4857  Respondent: Sue Edwin 11024097  Agent:**

MM35: **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35: Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35: If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

**Comment: MM41 - LPMM18/4858  Respondent: Sue Edwin 11024097  Agent:**

MM41: **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

**Comment: MM44 - LPMM18/4859  Respondent: Sue Edwin 11024097  Agent:**

MM44: The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

**Comment: MM9 - LPMM18/4851  Respondent: Sue Edwin 11024097  Agent:**

MM9: In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

**Comment: MM27 - LPMM18/602  Respondent: Julian Harnor 11024225  Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.
An increase of 37% in the number of houses proposed is excessive

7000 objections to the previous lower number have been ignored

It is Green Belt containing ancient woodland

It will join up Send and Ripley and constitute over development

The East Clandon Stream which runs through the site is shown as a high risk flood area by the Environment Agency and any development on the site will increase water run-off endangering properties downstream in Send Marsh which are already at risk

At least 800 extra cars will block up the adjacent roads

School and medical facilities will be strained to breaking point

With Alderton’s (120), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Since being deleted from the 2014 plan this has been increased twice, doubling the area

- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
The Employment Land Needs Assessment showed a reduction in demand for industrial land.

This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.

Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous.

Attached documents:

Comment: MM42 - LPMM18/604  Respondent: Julian Harnor 11024225  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/600  Respondent: Julian Harnor 11024225  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July.

It is a Green belt site with no special circumstances so it contradicts policy MM9.

It will detract from the heritage buildings at Send Marsh Green.

The additional traffic will increase pressure at the Send Crossroads and the already congested junction of Send Marsh Road and Portsmouth Road.

With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/605  Respondent: Julian Harnor 11024225  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine
words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more
cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/601</th>
<th>Respondent: Julian Harnor 11024225</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>MM9 Green Belt Policy</strong></td>
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<tr>
<td>Although the “modification” claim to protect the Green Belt except in very special circumstances, GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM45 - LPMM18/563</th>
<th>Respondent: Alan Willmott 11025281</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>I am entirely opposed to the development. It was not proposed in the previous plan and would remove a large chunk of green belt. It would further create an urban creep.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM2 - LPMM18/5009</th>
<th>Respondent: Victoria Rimmer 11026977</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>MM2- housing figures need to be re adjusted as they are no longer up to date and do not provide a sound basis for the plan or justify green belt loss</td>
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<tr>
<td>MM2 would be out of date with new ONS figures which means that there is excessive emphasis on the need for housing, particularly student accommodation and this should be re adjusted.</td>
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<tr>
<td>MM2. It is inappropriate for Guildford to sacrifice green belt land to provide homes for Woking. Guildford is renowned for its rural beauty and much depends on the town retaining its characteristics. Excessive development would damage the aesthetic of the town.</td>
<td></td>
<td></td>
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<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
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</tbody>
</table>
As a resident I would like to comment on the inaccessibility and deep complexity of these plans. The changes to the plans make it almost impossible to follow, as do the links to other documentation. As this plan is going to affect all local residents it is behelden to the council to make it accessible and readable.

The video explaining town centre development is very thin on fact and does not explain how any of the proposed developments will occur or what impact they will have on the town.

Please take time to review and reconsider your options. Guildford needs sensitive and timely growth. The NPPF needs to be used to Guildfords best advantage not its worst. Overdevelopment and inappropriate development will damage both residents and industry and ultimately we need to proceed with caution. People will only want to live here if it remains an attractive and accessible town with great amenities. The council needs to review housing numbers and development sites and be assured that their predictions for growth are accurate and not excessive.

**Attached documents:**

MM23 should place greater awareness height and bulk given the importance of views in and out of town. The iconic high street view is an integral part of Guildfords charm and must be protected.

**Attached documents:**

MM31 A height limit for North street is required

**Attached documents:**

MM9 In green belt proposed limited infilling outside identified settlement boundaries should not be allowed. It may set a precedent which would be damaging.

**Attached documents:**

**Comment:** MM13 - LPMM18/2678  **Respondent:** John Lay 11029409  **Agent:**
• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/2676  Respondent: John Lay 11029409  Agent:

I wish to strongly object to the proposed developments at Three Farms Meadows / Wisley Airfield for the following reasons.

GENERAL

• MM2 The housing target is wrong. Call for the hearing to be reopened so that the latest ONS figures and household projections can be taken into account.
• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/2681  Respondent: John Lay 11029409  Agent:

• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes)
• Strategic sites are to be exempt from design constraints There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/2682  Respondent: John Lay 11029409  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/2684  Respondent: John Lay 11029409  Agent:
SITE SPECIFIC – A35 – Three Farms Meadows

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR (the air traffic control beacon which prevents construction within a certain radius)
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
- MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

Attached documents:

Comment: MM41 - LPMM18/2679  Respondent: John Lay 11029409  Agent:

- MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].
- There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM9 - LPMM18/2677  Respondent: John Lay 11029409  Agent:

- MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM27 - LPMM18/179  Respondent: Mike Tarrant 11032705  Agent:

I object to MM27, MM41, MM42, MM48, Transport Strategy.

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

Attached documents:
Further to my original objections to the Draft Local Plan 2016, submitted via email May/July 2016

I raise the following objections to the Main Modifications proposed.

**I object to MM41 (Policy A43, Garlick’s Arch. Send Marsh/Burnt Common/Ripley).**

Because the addition of a further 150 homes making 550 in total (an increase of 37% is excessive).

Because, the 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. At June 2017 we had 500 houses and 10 Traveller/Show people plots. There were 7,000 objections to the smaller development which I feel has been ignored. This number of objection must be taken into consideration!

I object because GBC have exaggerated the need for the 12,426 houses in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.

Because, this site is on Green belt, permanently protected by NPPF to prevent the merging of settlements ie Ripley/Send Marsh/Send. There are no exceptional circumstances to take this site out of the Green Belt. The site is covered in Ancient Woodlands, containing trees that have stood since the 16th Century, this area must be conserved for future generations.

Because, this site is subject to flooding and has a flood zone 2 allocation.

I object to MM41 because of the increased pressure on local facilities, Doctors, Schools etc. that 500+ homes would bring to Send.

550 new homes would generate circa 60 additional children to be schooled. Send school no capacity for these extra pupils and Ripley school has been closed. Circa 1,375 folk would require GP services, where will they be provided?

Because of the additional traffic this will create. There are circa 1,700 houses in Send. The proposed developments at Garlick’s Arch 550, Clockbarn 60, Winds Ridge 40, Plus Alderton’s Farm 120. Adds 770 new homes. An increase of 45%. This is excessive for our roads and indeed the infrastructure of our Village.

**Attached documents:**

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**I object to MM27, MM41, MM42, MM48, Transport Strategy.**

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

**Attached documents:**

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**I object to MM42.**

Because of the increased pressure on local facilities, Doctors, Schools etc. that 500+ homes would bring to Send.

550 new homes would generate circa 60 additional children to be schooled. Send school no capacity for these extra pupils and Ripley school has been closed. Circa 1,375 folk would require GP services, where will they be provided?

Because of the additional traffic this will create. There are circa 1,700 houses in Send. The proposed developments at Garlick’s Arch 550, Clockbarn 60, Winds Ridge 40, Plus Alderton’s Farm 120. Adds 770 new homes. An increase of 45%. This is excessive for our roads and indeed the infrastructure of our Village.

**Attached documents:**
I object to MM42 (Policy A58, Burnt Common. Warehousing and Industrial units).

Because, of the increase from 7,000sq m. to 14,800sq m. of industrial and storage use. Which is not required. Employment Lands Needs Assessment (ELNA) 2015 shows an 80% reduction from the previous ELNA carried out by GBC in 2013 for employment space.

I object because Industrial and Warehousing sites and units are still available at Slyfield and in Guildford. So surely expanding existing Brown field industrial areas is better than creating a new one on Green Belt Land. Which contradicts MM9!

I question why the Cassidy Slyfield Ltd. North Slyfield site, allocated in 2014 By Guildford Council for Industrial and Warehouse use, was withdrawn from the Local Plan?

Because, heavy traffic would be attracted from the M25, A3 and the A247, which is not suitable for commercial traffic. The A247 passes the entrances to Send school and the Villages Medical Centre. The additional traffic will increase dangerous Nitrogen Dioxide levels.

Because of the additional traffic this will create. There are circa 1,700 houses in Send. The proposed developments at Garlick’s Arch 550, Clockbarn 60, Winds Ridge 40, Plus Alderton’s Farm 120. Adds 770 new homes. An increase of 45%. This is excessive for our roads and indeed the infrastructure of our Village.

Attached documents:

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Comment: MM42 - LPMM18/181  Respondent: Mike Tarrant 11032705  Agent:

I object to MM27, MM41, MM42, MM48, Transport Strategy.

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

Attached documents:

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Comment: MM44 - LPMM18/178  Respondent: Mike Tarrant 11032705  Agent:

I object to MM44 (Policy A63, Alderton’s Farm, Send Marsh Road).

Because the proposal for 120 houses was previously deleted from the earlier draft plan due to the objections levelled. The reintroduction of this, is equivalent of having a second referendum on leaving the EU. The people spoke, respect their wishes!

Because this is Green Belt Land with no special circumstances for development. Which contradicts MM9!

Because of the additional traffic this will create. There are circa 1,700 houses in Send. The proposed developments at Garlick’s Arch 550, Clockbarn 60, Winds Ridge 40, Plus Alderton’s Farm 120. Adds 770 new homes. An increase of 45%. This is excessive for our roads and indeed the infrastructure of our Village.
Comment: MM48 - LPMM18/182  Respondent: Mike Tarrant 11032705  Agent:

I object to MM27, MM41, MM42, MM48, Transport Strategy.

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

Attached documents:

Comment: MM27 - LPMM18/4274  Respondent: Jo Komisarczuk 11033057  Agent:

MM27, MM41, MM42, transport strategy

Burnt Common, Send, Ripley, will all be unduly affected by the road changes at Garlick’s Arch, ClockBarn, SendHill, Send Business Centre, and nearby Gosden Hill, the changes which are frequently on/off at Wisley/Ockham have not been addressed by the plan, beyond the use of the A3 with its proposed changes and the Clandon slip roads. No survey has been done on the current flows of traffic, no proper assessment has been completed at all of the aggregate traffic increases and impact on Burnt Common Lane, Send Barns Lane and Send Road. The constant gridlock at heavy use times – morning and evening - and the increase in pollution especially Nitrogen Dioxide which is already bordering on dangerous levels. There will be many thousands of extra cars travelling through the area, increasing the already loud noise from the A3.

Attached documents:

Comment: MM41 - LPMM18/4272  Respondent: Jo Komisarczuk 11033057  Agent:

I am writing to record my huge dismay and I wish to object in the strongest terms to the following changes to the Local Plan. Send appears to be the most heavily affected area in all the entire local plan but has new requirements put on it by the latest changes referred to as the Main Modifications about which I understand are the only changes I can comment on.

MM41 Land at Garlick’s Arch, Send Marsh, Policy A43

This land is currently farm land and has an area of ancient woodland, it is also within the greenbelt and therefore should never be built on. Especially as no evidence of exceptional need has been demonstrated.

The modification allows for 550 houses of which 450 must be built within the next five years. I understand that 7000 objections were raised about this in the previous consultation, all this work by 7000 people who live in and around the village has been ignored and we the people who live here count for nothing.
The site is constantly flooding in wet weather, and flood water even managed to get into the Gas main a few years back which caused many to be without gas for days in the winter. I understand that Lead sot is also a large issue on this area, although as I am wheelchair bound I have not proved this for myself.

The building on the site known as Garlic Arch will join Send to Ripley, as well as obliterating the hamlet of Burnt Common, which has its own identity, which has been under attack from local authority for many years. This joining of two villages and one hamlet can only be viewed as overdevelopment and therefore should not be allowed.

The building of all these extra houses in an area already struggling with not enough school places for the existing population plus no facilities for the local Doctors, Hospitals, Dentists etc.

Attached documents:

Comment: MM41 - LPMM18/4275  Respondent: Jo Komisarczuk 11033057  Agent:

MM27, MM41, MM42, transport strategy

Burnt Common, Send, Ripley, will all be unduly affected by the road changes at Garlick’s Arch, ClockBarn, SendHill, Send Business Centre, and nearby Gosden Hill, the changes which are frequently on/off at Wisley/Ockham have not been addressed by the plan, beyond the use of the A3 with its proposed changes and the Clandon slip roads. No survey has been done on the current flows of traffic, no proper assessment has been completed at all of the aggregate traffic increases and impact on Burnt Common Lane, Send Barns Lane and Send Road. The constant gridlock at heavy use times – morning and evening - and the increase in pollution especially Nitrogen Dioxide which is already bordering on dangerous levels. There will be many thousands of extra cars travelling through the area, increasing the already loud noise from the A3.

Attached documents:

Comment: MM42 - LPMM18/4273  Respondent: Jo Komisarczuk 11033057  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

This land was originally removed from the 2014 plan, since removal it has been re-added twice firstly to 700 sq m but now to a minimum of 14,800 sq m.

This land is also Green Belt and no exceptional circumstances have been offered for the use of this land in this way, which contradicts the policy MM9.

There is no need for industrial sites within Green Belt land, especially as Slyfield Estate has plenty of unused but available, it seems to be rather strange to claim a need for extra new industrial space on a site that requires it to show a need for exceptional circumstances as it is currently in the green Belt and should be left.

The employment land needs assessment shows a reduction in demand for industrial sites, so why the need for this site. I see that this change is on top of the 25% increase in the Send business centre. The London road the A3 prior to the Ripley Bypass, is a two lane road, all other roads are small narrow lanes, how can large/heavy trucks travel here on country lanes? Nitrogen dioxide levels in this area are already dangerous to health.

Attached documents:
Comment: MM42 - LPMM18/4276  Respondent: Jo Komisarczuk 11033057  Agent:

MM27, MM41, MM42, transport strategy

Burnt Common, Send, Ripley, will all be unduly affected by the road changes at Garlick’s Arch, ClockBarn, SendHill, Send Business Centre, and nearby Gosden Hill, the changes which are frequently on/off at Wisley/Ockham have not been addressed by the plan, beyond the use of the A3 with its proposed changes and the Clandon slip roads. No survey has been done on the current flows of traffic, no proper assessment has been completed at all of the aggregate traffic increases and impact on Burnt Common Lane, Send Barns Lane and Send Road. The constant gridlock at heavy use times – morning and evening - and the increase in pollution especially Nitrogen Dioxide which is already bordering on dangerous levels. There will be many thousands of extra cars travelling through the area, increasing the already loud noise from the A3.

Attached documents:

Comment: MM9 - LPMM18/4278  Respondent: Jo Komisarczuk 11033057  Agent:

MM9 Green Belt

Guildford used some nice words and rephrasing, to enable them to claim all this building is necessary on Green Belt land. In nobody’s mind can the infiltration of the Green Belt here in the Send, Burnt Common area be seen as limited infilling. Introducing a subjective test is wrong and negates the Green Belt protection.

Attached documents:

Comment: Other comments - LPMM18/4281  Respondent: Jo Komisarczuk 11033057  Agent:

Other developments

and the other developments planned, ClockBarn – 60 houses, SendHill travellers site and 40 houses, Send Business Centre, which is to be increased by 25% despite it being in a conservation area. These changes are huge for any town, to do this to a rural area on the edge of the green belt is totally unacceptable. If this was to be completed as Guildford Council have not dealt with any changes to local roads, schools, or health services should be shared around the entire council area, not all heaped in a single place, which is just foolish.

Attached documents:

Comment: MM45 - LPMM18/2079  Respondent: Mrs Deirdre Bramley 11033793  Agent:

Guildford Borough Council (GBC) is consulting on a revised version of its Local Plan to include a new site (A64) in Normandy with 105 houses built over a three year period on Green Belt land, a 7% increase in the number of houses in Normandy and Flexford.
The proposed site has not been included in any of the previous versions of the local plan that have gone out for consultation as the area in question was rated as “red” for sensitivity. If approved, this would become the first incursion into the Green Belt by crossing the natural barrier of the railway line separating Flexford from Normandy with the potential risk of major urbanisation.

The plan states that it wishes to protect the Green Belt and will only encroach into the Green Belt under exceptional circumstances. However, GBC has not explained the ‘exceptional circumstances’ that relate to this site. Previous planning applications for the development of this site have been refused on the grounds of its extreme sensitivity and the potential damage to the openness of the Green Belt.

GBC has proposed no improvements to infrastructure in Normandy and Flexford. Road and sewage systems are already overloaded and a 7% increase in houses over a three-year period will only make matters worse.

In addition planning permission has been agreed for the construction of a new road bridge on the A323 spanning the railway line between Aldershot and Guildford at Ash Station so as to remove the current bottleneck for vehicles travelling between Aldershot & Guildford, as well as an imminent major housing development in Ash/Tongham. The increased traffic from this development will have serious consequences for the A323, the A31 Hog’s Back and Normandy. 105 new houses in Glaziers Lane will add further to congestion and the increased traffic exiting Glaziers Lane on to the A323 will be both hazardous and detrimental to the village, especially during peak times.

Finally the Local Plan makes no mention of the impact of Site 64 on local infrastructure – doctor’s surgeries, sewage, utilities, drainage – there is already a large lake within the curtilage of the proposed site, which would render it liable to flooding.

Attached documents:

**Comment: MM41 - LPMM18/1162  Respondent: Nick Pycraft 11034817  Agent:**

**MM41 Land at Garlick's Arch, Send Marsh Burnt Common and Ripley**

I object to development on site MM41. I am informed that there were thousands of objections (my own included) to the previous proposal of 400 houses at this site, so it is appalling that these have been ignored, as the proposed number of houses has actually increased to 550. My previously stated objections still stand. Firstly, the pressure on an already heavily used A3 would be too great, leading to severe delays, increased accident risk and potential gridlock. This applies equally if not more so to the notion that the A247 through Send could cope with this increase in traffic, as the volume of traffic travelling to and from Woking through Send often sees long queues, often coming to a standstill, throughout the village at peak commuting times.

This is also another area that serves as a barrier between villages, Send and Ripley, so I reiterate that the National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’.

Attached documents:

**Comment: MM41 - LPMM18/4208  Respondent: Nick Pycraft 11034817  Agent:**

**MM41 Land at Garlick's Arch, Send Marsh Burnt Common and Ripley**


I object to development on site MM41. I am informed that there were thousands of objections (my own included) to the previous proposal of 400 houses at this site, so it is appalling that these have been ignored, as the proposed number of houses has actually increased to 550. My previously stated objections still stand. Firstly, the pressure on an already heavily used A3 would be too great, leading to severe delays, increased accident risk and potential gridlock. This applies equally if not more so to the notion that the A247 through Send could cope with this increase in traffic, as the volume of traffic travelling to and from Woking through Send often sees long queues, often coming to a standstill, throughout the village at peak commuting times.

This is also another area that serves as a barrier between villages, Send and Ripley, so I reiterate that the National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’.

Attached documents:

Comment: MM42 - LPMM18/1163  Respondent: Nick Pycraft 11034817  Agent:

**MM42 Land around Burnt Common warehouse, London Road, Send**

I object to development on site MM42. This is another site where the proposed development has been increased, from 7000 to 14,800 square metres. This industrial space is unnecessary, as the Employment Land Needs Assessment concluded that there is much less demand for industrial land. In any case, I understand that Slyfield actually has a large area which would be much more suitable.

Once again, any development would lead to an unsustainable level of increased traffic in the area, with the ensuring problems which I have previously described. For all these reasons, this is another site which should be dismissed under Policy P2, MM9, Policy Paragraph (1) as being 'inappropriate development', with no 'very special circumstances' to justify proceeding further.

To conclude, I object to the Local Plan, as it clearly fails to recognise that there is insufficient infrastructure in and around Send and Send Marsh to cope with an increase in both traffic and population. Not only are the roads unable to take more vehicles, but The Villages Surgery and the school are also already under severe pressure, and as such cannot be expected to cope with an increased population. There is also the very real danger of an increased risk of accidents around the school. Much of the land proposed for development is also prone to frequent flooding. These are clearly valid objections in the eyes of those who know the area.

Attached documents:

Comment: MM42 - LPMM18/4209  Respondent: Nick Pycraft 11034817  Agent:

**MM42 Land around Burnt Common warehouse, London Road, Send**

I object to development on site MM42. This is another site where the proposed development has been increased, from 7000 to 14,800 square metres. This industrial space is unnecessary, as the Employment Land Needs Assessment concluded that there is much less demand for industrial land. In any case, I understand that Slyfield actually has a large area which would be much more suitable.

Once again, any development would lead to an unsustainable level of increased traffic in the area, with the ensuring problems which I have previously described. For all these reasons, this is another site which should be dismissed under
Policy P2, MM9, Policy Paragraph (1) as being ‘inappropriate development’, with no ‘very special circumstances’ to justify proceeding further.

To conclude, I object to the Local Plan, as it clearly fails to recognise that there is insufficient infrastructure in and around Send and Send Marsh to cope with an increase in both traffic and population. Not only are the roads unable to take more vehicles, but The Villages Surgery and the school are also already under severe pressure, and as such cannot be expected to cope with an increased population. There is also the very real danger of an increased risk of accidents around the school. Much of the land proposed for development is also prone to frequent flooding. These are clearly valid objections in the eyes of those who know the area.

Attached documents:

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Comment: MM44 - LPMM18/1161  Respondent: Nick Pycraft 11034817  Agent:

I wish to object to the proposed Local Plan for the village of Send, Send Marsh and the surrounding Green Belt area. I object to the following proposed developments in particular:

**MM44 Land west of Alderton's Farm, Send Marsh Road, Send**

I object to development on site MM44. Having raised objections to previous proposals for development at this site, I was pleased to see that this area was no longer under consideration, and so am dismayed to see it being proposed again. I fail to see how it could have been analysed and found to be unsuitable (which it is), only to be once again under consideration.

This area serves as a barrier between Send Marsh and Send Village. The National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is to ‘prevent neighbouring towns merging into one another’.

I draw your attention to Policy P2, MM9, Policy Paragraph (1): 'Inappropriate development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.' Anyone who knows this particular area will attest to the proposed development as being inappropriate. The land in question floods every winter, and retains water at all but the very driest times the rest of the year.

It is also clear that the road could not cope with additional housing alongside it. One only needs to travel through Send Marsh to Send to realise that the road narrows in places and has tight bends which already slow traffic; the almost 90-degree turn on the corner of Send Marsh Road and Polesden Lane (the site of several accidents over the years), and a similar turn at the end of Send Marsh Road on the approach to Mays Corner restrict traffic flow already. Any additional traffic on this stretch of road from the proposed housing on this site will not only add to the traffic flow problem, but also make it increasingly dangerous (also bearing in mind that this is also a pedestrianised road).

These are very clear reasons why this site is inappropriate for development, and I have heard of no 'very special circumstances' which would change the situation.

Attached documents:

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Comment: MM44 - LPMM18/4207  Respondent: Nick Pycraft 11034817  Agent:

**MM44 Land west of Alderton’s Farm, Send Marsh Road, Send**

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I object to development on site MM44. Having raised objections to previous proposals for development at this site, I was pleased to see that this area was no longer under consideration, and so am dismayed to see it being proposed again. I fail to see how it could have been analysed and found to be unsuitable (which it is), only to be once again under consideration.

This area serves as a barrier between Send Marsh and Send village. The National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’.

I draw your attention to Policy P2, MM9, Policy Paragraph (1): ‘Inappropriate development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.’ Anyone who knows this particular area will attest to the proposed development as being inappropriate. The land in question floods every winter, and retains water at all but the very driest times the rest of the year.

It is also clear that the road could not cope with additional housing alongside it. One only needs to travel through Send Marsh to Send to realise that the road narrows in places and has tight bends which already slow traffic; the almost 90-degree turn on the corner of Send Marsh Road and Polesden Lane (the site of several accidents over the years), and a similar turn at the end of Send Marsh road on the approach to Mays Corner restrict traffic flow already. Any additional traffic on this stretch of road from the proposed housing on this site will not only add to the traffic flow problem, but will also make it increasingly dangerous (also bearing in mind that this is also a pedestrianised road).

These are clear reasons why this site is inappropriate for development, and I have heard of no ‘very special circumstances’ which would change the situation.

Attached documents:

Comment: MM41 - LPMM18/998  Respondent: Len Ozanne 11036417  Agent:

Ref: Objection to Planning MM41, MM42, MM44, MM9 and transport strategies

I write to object most strongly to the planning modifications to the above developments.

I object because the excess number of properties being planned will change the village out of recognition, we do not have the space and infrastructure for this number of properties.

The vast enlargement of the industrial areas will cause excessive noise, damage and danger to the younger and older residents in the village. These developments are again out of proportion to the village of Send.

The traffic changes on and off the A3 will cause major traffic congestion, mainly due to the lack of road space in Old Woking at all times and Ripley during the peak rush hour periods.

The Green Belt should be protected and not ignored.

Overall these planning applications cause a vast overdevelopment of the village and area of Send and should not be continued at the scale of the current proposals.

Attached documents:

Comment: MM42 - LPMM18/999  Respondent: Len Ozanne 11036417  Agent:
Ref: Objection to Planning MM41, MM42, MM44, MM9 and transport strategies

I write to object most strongly to the planning modifications to the above developments.

I object because the excess number of properties being planned will change the village out of recognition, we do not have the space and infrastructure for this number of properties.

The vast enlargement of the industrial areas will cause excessive noise, damage and danger to the younger and older residents in the village. These developments are again out of proportion to the village of Send.

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The traffic changes on and off the A3 will cause major traffic congestion, mainly due to the lack of road space in Old Woking at all times and Ripley during the peak rush hour periods.

The Green Belt should be protected and not ignored.

Overall these planning applications cause a vast overdevelopment of the village and area of Send and should not be continued at the scale of the current proposals.

Attached documents:

Comment: MM9 - LPMM18/1001  Respondent: Len Ozanne 11036417  Agent:

Ref: Objection to Planning MM41, MM42, MM44, MM9 and transport strategies

I write to object most strongly to the planning modifications to the above developments.
I object because the excess number of properties being planned will change the village out of recognition, we do not have the space and infrastructure for this number of properties.

The vast enlargement of the industrial areas will cause excessive noise, damage and danger to the younger and older residents in the village. These developments are again out of proportion to the village of Send.

The traffic changes on and off the A3 will cause major traffic congestion, mainly due to the lack of road space in Old Woking at all times and Ripley during the peak rush hour periods.

The Green Belt should be protected and not ignored.

Overall these planning applications cause a vast overdevelopment of the village and area of Send and should not be continued at the scale of the current proposals.

**Attached documents:**

**Comment: MM13 - LPMM18/1735  Respondent: Peter Bassett 11036545  Agent:**

MM13 - the town centre retail allocation should be lowered to reflect more accurately current and emerging shopping trends and the floorspace not allocated should be assessed for alternative residential use.

**Attached documents:**

**Comment: MM2 - LPMM18/1734  Respondent: Peter Bassett 11036545  Agent:**

Sir/Madam

I confirm that I *OBJECT* seriatim to some of the proposed modifications to the Guildford Local Plan Strategy and Sites contained in the Schedule of Main Modifications.

*GENERAL*

MM2 - should be modified and the examination by the Inspector reopened in order to quantify the impact of the latest ONS figures and household projections. In addition, the requirement for Guildford to meet the unmet need generated in Woking Borough Council should be removed and the requirement for Green Belt site releases should be reduced, accordingly.

**Attached documents:**

**Comment: MM3 - LPMM18/1743  Respondent: Peter Bassett 11036545  Agent:**

Sir/Madam

I consider the Local Plan to be *unsound *and *OBJECT* to Policy S3.
Guildford Borough Council has not properly observed the hierarchy of development and brownfield opportunities, particularly within the town centre, have not been fully exploited. Policy S3 is inadequate in not addressing the infrastructure deficit in a robust manner due to its excessive reliance on A3 improvements, which are beyond its control.

Attached documents:

**Comment: MM41 - LPMM18/1738  Respondent: Peter Bassett 11036545  Agent:**

MM41 - the transport strategy is reliant on inadequate modelling. This includes the delayed M25 Junction 10 scheme proposed by Highways England and the excessive reliance on A3 (Guildford) improvement both of which are outside Guildford Borough Council control and with uncertain commencement and implementation dates.

Attached documents:

**Comment: MM50 - LPMM18/1740  Respondent: Peter Bassett 11036545  Agent:**

*SITE SPECIFIC - A35 - THREE FARMS MEADOWS
*

The additional land south of the appeal site fails to mitigate the issue of density because much of it is constrained by the VOR and it also abuts the Ockham Conservation Area and increases the visibility of the site both to and from the Surrey Hills AONB. In addition, no justification is provided for the significant reduction in the size of the SNCI the biodiversity of which will be eroded and a complete Appropriate Assessment and Habitats Regulation Assessment should be submitted to enable a full and accurate assessment of the impact of the proposed development.

Attached documents:

**Comment: MM2 - LPMM18/1687  Respondent: Brian Slade 11036705  Agent:**

The Planning Inspector's Report on which these Modifications are based clearly demonstrates a lack of concern or perhaps contempt for the residents of Send who made many thousands of objections to the 2016 and 2017 Plans which have been totally ignored.

Even worse, in relation to POLICY 32, the Planning Inspector based his report on housing need in Guildford Borough as 789 houses per annum when the September data from the Government's Office for National Statistics stated that appropriate housing growth in Guildford Borough can be achieved with 460 houses per year and Barton Wilson a respected consultancy considers 431 houses as meeting the need.

**Thus the Inspector's Report is fatally flawed in terms of housing needs by relying on inaccurate information with a close to 50% overstatement of housing needs in the Borough** and should be discounted with a revised plan to meet much reduced housing needs produced asap. If not then there are significant grounds to draw this error to the attention of the Secretary of State to force a revised Plan.
GBC appears to have a pre-determined agenda to ruin the quality of life for the residents of Send and ignore the seriously increased pollution and traffic problems which these Modifications will cause - clearly totally uncaring for the health and safety of residents. It would appear that GBC is deliberately failing to take into account the inadequate infrastructure of the area and to put in place planning contraints as is required by Law. GBC has not even undertaken a formal traffic impact study relating to the proposed new A3 sliproads and the Guildford Plan on the A247 and surrounding road networks.

Attached documents:

Comment: MM27 - LPMM18/1693  Respondent: Brian Slade 11036705  Agent:

MM27,MM41,MM42,MM48 Transport Strategy Increased traffic density caused by the proposed addition of 770 dwellings to Send, an increase of 45%; the majorly expanded industrial and storage area: and the new sliproads to and from the A3 resulting in thousands of extra cars and lorries travelling into Woking daily via the A247 together with the serious congestion and air pollution (which is already at dangerous levels) does not seem to have had any form of formal traffic assessment undertaken by GBC otherwise they would realise that their proposed plan will result in the destruction of Send's current infrastructure and that of its surrounding areas as well as increased noise and nitrogen dioxide pollution causing damage to the health of residents as well as serious traffic delays and gridlock of local roads.

Attached documents:

Comment: MM41 - 10056821  Respondent: Brian Slade 11036705  Agent:

Specifically I OBJECT to the following Policies in addition to Policy 32:

I object to MM41 - Land at Garlick's Arch, Send Marsh Policy A43 because, where despite some 7000 previous objections which have been made, it is now proposed that the previously planned 400 should be increased to 550 homes of which 450 should be built in the first 5 years (given the un-availbilty of builders in this area due to the large construction projects such as Heathrow and the new Petrol Pipeline it is questionable whether this is remotely possible). Based on the Government's ONS calculations this would represent an excessive burden on Send/Ripley as the figure demanded for this site alone would represent nearly 20% of GBC's total annual housing needs per annum!

This area which is permanent Green Belt with no "exceptional circumstances" contains ancient woodland dating back to Elizabeth I which GBC are proposing to destroy. It is also currently a Flood Zone 2 allocation having frequent flooding and is contaminated land with lead shot following 50 years of shooting activity. The proposed development will generate excessive traffic on roads that already get gridlocked in Send and Ripley at peak times and the over development would also join up Ripley and Send which is contrary to the key purpose of the Green Belt.

Local schools and medical facilities would be under tremendous overload with the proposed increase in population and likely to collapse - without major infrastructure improvement and development - which the Plan does not even mention or consider.

Attached documents:

Comment: MM41 - LPMM18/1694  Respondent: Brian Slade 11036705  Agent:
Increased traffic density caused by the proposed addition of 770 dwellings to Send, an increase of 45%; the majorly expanded industrial and storage area; and the new sliproads to and from the A3 resulting in thousands of extra cars and lorries travelling into Woking daily via the A247 together with the serious congestion and air pollution (which is already at dangerous levels) does not seem to have had any form of formal traffic assessment undertaken by GBC otherwise they would realise that their proposed plan will result in the destruction of Send's current infrastructure and that of its surrounding areas as well as increased noise and nitrogen dioxide pollution causing damage to the health of residents as well as serious traffic delays and gridlock of local roads.

Attached documents:

Comment: MM42 - LPMM18/1690  Respondent: Brian Slade 11036705  Agent:

I object to MM42 - Land at Burnt Common, London Road Policy A58 which was deleted from the 2014 draft due to all the objections because there is no proven demand now or in the future for additional industrial capacity. It would therefore appear that GBC is presuming that a new A3 junction will be built sometime in the future at Send and justify this excessive industrial development within a Green Belt residential/rural area. Slyfield and Guildford still have empty sites and industrial units and the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole of Guildford Borough - not the excessive allocation of 10 hectares in Send alone within the Green Belt which will cause major traffic gridlock in the surrounding roads and join up existing villages - again defeating the Green Belt. It is also noted that the word "maximum" in the 2016 Plan has, very significantly, been changed to "minimum". Existing roads necessary to service such a development do not have anywhere near the capacity to accommodate such a demand. This is totally unacceptable and smacks of an attempt at sleight of hand and dishonesty by GBC to confuse residents.

Attached documents:

Comment: MM42 - LPMM18/1691  Respondent: Brian Slade 11036705  Agent:

I object to M442 Land at Alderton's Farm, Send Marsh Road Policy A63 because this has increased the proposed housing from 45 to 60 homes on a road with very restricted access being effectively single lane in places and an already congested and dangerous road junction with the A247 - despite thousands of previous objections by Send residents. This is also an area prone to serious surface water flooding which can only get worse.

Attached documents:

Comment: MM42 - LPMM18/1695  Respondent: Brian Slade 11036705  Agent:

MM27,MM41,MM42,MM48 Transport Strategy Increased traffic density caused by the proposed addition of 770 dwellings to Send, an increase of 45%; the majorly expanded industrial and storage area; and the new sliproads to and from the A3 resulting in thousands of extra cars and lorries travelling into Woking daily via the A247 together with the serious congestion and air pollution (which is already at dangerous levels) does not seem to have had any form of formal traffic assessment undertaken by GBC otherwise they would realise that their proposed plan will result in the destruction of Send's current infrastructure and that of its surrounding areas as well as increased noise and nitrogen dioxide pollution causing damage to the health of residents as well as serious traffic delays and gridlock of local roads.
MM27, MM41, MM42, MM48 Transport Strategy

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Comment: MM9 - LPMM18/1692  Respondent: Brian Slade 11036705  Agent:

I object to Green Belt Policy MM9 GBC want an exception for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered within the village". This introduces a subjective test, inviting speculators and developers to pick off opportunities at the edge of the village at the expense of villagers' environment.

Comment: MM13 - LPMM18/4796  Respondent: Judith Mercer 11036801  Agent:

MM13

There is too much allocation for retail in the town centre. The evidence base on retail is out of date. More sustainable housing could be allocated in its place.

Comment: MM2 - LPMM18/4792  Respondent: Judith Mercer 11036801  Agent:

Re: Guildford Local Plan: Strategy & Sites - Main Modifications 2018-Sept 2018

I object to the following policies as amended by the main modifications of the above plan:-

MM2-Number of houses

I strongly object to this policy for the following reasons.
The housing target is wrong and therefore the Public examination hearing must be re-opened to take account of the up to date ONS figures and household projections data. This is vital because the new figures published reduced the projected growth in households for Guildford by 40.5% which is significant. It represents a reduction of 4507 households required for the plan period 2015-2034. It equates to well over 2 large ‘strategic sites’ included in the current Plan.

Guildford Borough Council should have seen this change and should have reduced housing numbers because of the ONS population projections in May 2018. Instead it actually increased the number of houses in the current version of the Plan.

There should be no requirement for Guildford to take Woking’s unmet housing need especially as this would require further greenbelt release.

The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send, which will be car dependent would have a severe impact on Portsmouth Road, Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/4801  Respondent: Judith Mercer 11036801  Agent: MM23(D1)

The requirement for the strategic sites to be sustainable for residents who need to walk or cycle and cannot rely on cars to transport them has been reduced in the amended Plan. It cannot be right to propose development which might well exclude a portion of the population who do not wish to or can’t rely on motor transport to socialise or travel to work (i.e. cycle to a station or place of work). These factors should be a significant consideration/requirement in this policy.

This policy states the constraints on design should not be considered in respect of Strategic sites. This is wrong. The Council should commit to a standard of design to protect the borough as a whole.

Attached documents:

Comment: MM3 - LPMM18/4793  Respondent: Judith Mercer 11036801  Agent: MM3-(S3) Town centre Policy

The town centre policy is inadequate. It fails to specify what is planned for the town, is too general and imprecise and does not address the infrastructure deficit. The policy falls short of a commitment to planning for houses for residents, which could accommodate more people and produce more in social housing.

Attached documents:
Comment: MM35 - LPMM18/4805  Respondent: Judith Mercer 11036801  Agent:

MM35-Site A25 Gosden Hill Farm

I object to this strategic site because Gosden Hill is located entirely in Green Belt land. No exceptional circumstances under NPPF have been shown to allow for development of the land on this site or for this land to be removed from Green Belt.

This part of the Green Belt protects Guildford from urban sprawl, a prime purpose of the Green Belt.

A development of 1800 houses is not needed because it is based on out of date housing need figures. I refer to the updated ONS figures of reduced population and household statistics for Guildford during the Plan period, made known from May 2018.

Any restructuring of local roads as part of any development would have a severe detrimental impact on an already congested area. It would impact on all surrounding roads connecting Guildford.

Attached documents:

Comment: MM36 - LPMM18/4806  Respondent: Judith Mercer 11036801  Agent:

MM36-A26 Blackwell Farm

I object to this Strategic site because Blackwell Farm is located entirely in Green Belt. No exceptional circumstances have been demonstrated to justify proposed development on this land under the NPPF, or for the land to be removed from Green Belt.

This land at this site fulfils all 5 important functions of the Green Belt, prevents urban sprawl around Guildford and provides a vital “lung” to protect us from pollution, harmful effects of inappropriate development and traffic congestion.

The development of 1800 houses is not needed as it is based on out of date figures for household projections for the borough. These have been reduced substantially by 40.5%.

Attached documents:

Comment: MM40 - LPMM18/4803  Respondent: Judith Mercer 11036801  Agent:

SPECIFIC SITES

MM40 (A35) Three Farms Meadows aka Wisley Airfield

I object to this Strategic site.

The Plan includes here Policy A35 for a development on essentially the same scale on Wisley Airfield as that rejected by the Secretary of State on 13th June 2018. The Councils decision to refuse permission for the planning application 15/P/00012 was upheld by the Secretary of State and the planning appeal was dismissed.
This Site with proposed development of 2000 houses, and similar in scale to that of the above planning appeal, has been inserted again in the proposed Local Plan. It is based on the above planning application which was proposed by developers, rejected by GBC and refused by the government only 3 months ago.

The proposed number of houses and scale of development as suggested on this site would still be wholly inappropriate for the area, the site being in Green Belt. Many issues and objections have been raised by residents and the Council in response to the appeal dismissed in June 2018. These remain the same or are not sufficiently mitigated.

It does not make sense to base the development of this site on household projections that have been reduced by 40.5%.

The addition of other new land to the south of the appeal site does not mitigate the density problems as much of that land is constrained by the VOR.

The land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.

**Attached documents:**

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**Comment:** MM41 - LPMM18/4802  **Respondent:** Judith Mercer 11036801  **Agent:**

**MM41**

The transport strategy relies on inadequate infrastructure modelling including the Highways England Junction 10 scheme delayed for at least 2 years. The impact this will have on certain development sites specified in the Plan which rely on this scheme may be severe and has not been given proper consideration in the policy. The Council is relying too much on the A3 Guildford improvements that are not under their control and that have no fixed time scale.

**Attached documents:**

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**Comment:** MM41 - LPMM18/4807  **Respondent:** Judith Mercer 11036801  **Agent:**

**MM41 Site 43 Garlick’s Arch- Send Marsh**

I object to the policy to develop this site which is in Green Belt. No exceptional circumstances have been proven to justify removing the land from Green Belt.

There is no guarantee that the houses to be built here will be more affordable if the Plan increases the numbers of homes built. All new homes built in this part of the country are very expensive. It will cause severe traffic congestion in Send and Ripley where roads are already at capacity.

The need for this development is not proven and is based on incorrect household projections. This site along with other sites marked in the Plan should be reconsidered using up to date ONS figures (Sept 2018).

**Attached documents:**

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**Comment:** MM50 - LPMM18/4804  **Respondent:** Judith Mercer 11036801  **Agent:**

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MM47- the size of the SNCI (Site of Nature Conservation Importance) has been drastically reduced (to about 15-20% of its former size). This is unacceptable since the whole site qualifies as an SNCI on ecological grounds. There is no justification for altering the SNCI boundary.

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed, in breach of case law.

I would argue that any development of this site and especially of the scale stipulated in the Plan will be in breach of current NPPF law in particular that of the required principle to preserve the openness of the Green Belt (paras 79-90). Any harm by inappropriate development will prevent the preservation of openness of the Green Belt- Case law Boot v Elmbridge Borough Council Feb 2017.

Attached documents:

Comment: MM51 - LPMM18/1548 Respondent: Judith Mercer 11036801 Agent:

Dear Madam,

Re: Guildford Local Plan: Strategy & Sites-Main Modifications 2018-Sept 2018
AND
Re: Amendment 1: Horsley-West Horsley( South) (MM51)- map page 84

I write to you to confirm that I give my firm approval of the above modification of the village settlement boundary i.e that it has been brought back to Silkmore Lane’s property boundary. This amendment will protect the greenbelt land and valued rural character of the village of West Horsley.

Attached documents:

Comment: MM9 - LPMM18/4795 Respondent: Judith Mercer 11036801 Agent:

MM9-Green Belt

This policy has not taken into account the large reduction in projected households (see MM2 above). Despite previous promises to the residents to protect the Green Belt in the borough, 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt.

In view of the reduced housing projections from ONS, and the Plan stating that “more housing is likely to come forward over the plan period” (being an unknown quantity), the exceptional circumstances necessary to amend Green Belt boundaries OR the very special circumstances necessary to justify any development in the Green Belt do not exist, especially as
- 66% of the planned development is on land currently in the Green Belt
- The new policy S3 on the town centre (largest and most sustainable location in the borough and with more urban and brownfield sites available) is weak and unacceptable.

I call for the Council to commit in the Plan to protecting the Green Belt pursuant to NPPF 2012 (current Planning law). The current version of the Plan where it
proposes infilling in and around villages will result in a weakening of the protection of the countryside. It will directly impact the Green Belt around Guildford which is an important green “lung” for this borough. It will create urban sprawl contrary to the principles of Green Belt policy in the NPPF.

Attached documents:

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**Comment:** MM2 - LPMM18/3346  **Respondent:** Debra Somner Fraser 11041025  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.
I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in
the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of
congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was
pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the
Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which
could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem
viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and
East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving
speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size
   from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these
   North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways
   England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the
   A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This
   would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common,
   avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of
   Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local
   Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around
   Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to
   the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution
   is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the
    South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic.
Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and
   parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for
   traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that
   Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site
   behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without
   mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageble traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/3349 Respondent: Debra Somner Fraser 11041025 Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.
MM23 Promotion of "green approaches" should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Comment: MM23 - LPMM18/3357  Respondent: Debra Somner Fraser 11041025  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Comment: MM3 - LPMM18/3347  Respondent: Debra Somner Fraser 11041025  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Comment: MM3 - LPMM18/3356  Respondent: Debra Somner Fraser 11041025  Agent:

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

**Comment: MM31 - LPMM18/3350  Respondent: Debra Somner Fraser 11041025  Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

**Comment: MM32 - LPMM18/3351  Respondent: Debra Somner Fraser 11041025  Agent:**

MM32 A height limit for White Lion Walk is required.

Attached documents:

**Comment: MM33 - LPMM18/3352  Respondent: Debra Somner Fraser 11041025  Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

**Comment: MM35 - LPMM18/3353  Respondent: Debra Somner Fraser 11041025  Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41</th>
<th>LPMM18/3354</th>
<th>Respondent: Debra Somner Fraser 11041025</th>
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</tr>
</thead>
<tbody>
<tr>
<td>MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.</td>
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<table>
<thead>
<tr>
<th>Comment: MM44</th>
<th>LPMM18/3355</th>
<th>Respondent: Debra Somner Fraser 11041025</th>
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<tbody>
<tr>
<td>MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.</td>
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<table>
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<tr>
<th>Comment: MM9</th>
<th>LPMM18/3348</th>
<th>Respondent: Debra Somner Fraser 11041025</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
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<td>MM27 MM41, MM42 and MM48 Transport Strategy All the combined developments planned will place a huge burden on the present traffic system. Send is already used by many Woking Commuters to reach the A3. It is already a very busy road. More traffic will lead to more delays, gridlock, noise and pollution</td>
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</table>
To The Planning Policy Team, Guildford Borough

I wish to object to the vastly increased plans for building in Send Village, which seem disproportionate to plans for other villages in the Borough.

MM41 Land at Garlick’s Arch, Send Marsh, Policy A43

Previous objections have been ignored. Ancient woodland, which enhances our environment, will be destroyed.

Traffic congestion in the area will become a greater problem.

Local facilities like Schools and Medical Centre will also be severely stretched.

Attached documents:

Comment: MM41 - LPMM18/1753  Respondent: Beryl Sussex 11041633  Agent:

MM27 MM41, MM42 and MM48 Transport Strategy

All the combined developments planned will place a huge burden on the present traffic system.

Send is already used by many Woking Commuters to reach the A3.

It is already a very busy road. More traffic will lead to more delays, gridlock, noise and pollution.

Attached documents:

Comment: MM42 - LPMM18/1750  Respondent: Beryl Sussex 11041633  Agent:

MM42 Land at Burnt Common, London Rd., Send, Policy A58

Green Belt Land in Send, should not be used when there is capacity at Slyfield for Industrial Units.

With a further increase of 25% at Send Business Centre also planned that seems excessive for a village such as Send.

Attached documents:

Comment: MM42 - LPMM18/1755  Respondent: Beryl Sussex 11041633  Agent:

MM27 MM41, MM42 and MM48 Transport Strategy

All the combined developments planned will place a huge burden on the present traffic system.

Send is already used by many Woking Commuters to reach the A3.
It is already a very busy road. More traffic will lead to more delays, gridlock, noise and pollution.

Attached documents:

Comment: MM44 - LPMM18/1751  Respondent: Beryl Sussex 11041633  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Rd., Policy A62

This development was deleted from earlier plans because of Local Objections and only re-inserted in July 18.

The objections are still applicable. It is Green Belt Land, the rural road is narrow and not built for the present volume of traffic.

So why plan to increase traffic and add to the already very congested road system?

The present infrastructure is not adequate.

Attached documents:

Comment: MM48 - LPMM18/1756  Respondent: Beryl Sussex 11041633  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

All the combined developments planned will place a huge burden on the present traffic system.

Send is already used by many Woking Commuters to reach the A3.

It is already a very busy road. More traffic will lead to more delays, gridlock, noise and pollution.

Please listen to the people from Send and weigh the objections thoroughly and carefully.

Attached documents:

Comment: MM2 - LPMM18/4959  Respondent: Sam Thompson 11042433  Agent:

I am very disappointed with the latest draft attempt of the Local Plan. It appears that yet again the concerns and reservations of local residents are being ignored, the tens of thousands of previous rejections to each daft local plan with minimal tweaks to prior versions to vainly attempt to justify the same unwanted developments over and over.

Guildford and its surrounding villages such as Ripley and Send are desirable places to live precisely because they are rural and not over developed.

While there is a need for development in the borough, it must not come at the price of destroying the character of the area.
The latest Local Plan would reduce the attractiveness of the area as a place to live and raise families - something the council is already trying to achieve by closing the local school in Ripley leaving local families struggling to find school places for their children - something that will hardly be helped by building another 700+ homes...

Attached documents:

**Comment:** MM27  LPMM18/4964 **Respondent:** Sam Thompson 11042433  **Agent:**

MM27, MM41, MM42 and MM48, Transport Strategy

The local roads are narrow, already over congested and badly maintained. SendMarsh Road, Polesdon Lane and Newark Lane are busy commuting roads that constantly have pot holes that are not repaired. There is frequent gridlock and also no real public transport options as an alternative. The local area cannot sustain thousands more cars transiting in the area that would be the result of 770 more houses in the area.

The proposed changes to the A3 and Clandon slip roads do nothing to address these issues.

Attached documents:

**Comment:** MM41  LPMM18/4960 **Respondent:** Sam Thompson 11042433  **Agent:**

MM41, Garlicks Arch, Policy A43

This is an item that has been massively objected to previously - I am not sure why the council still seems to think it may be viable when there were more than 7000 objections to a lower number.

It is green belt land including ancient woodland.

I have seen the area flood frequently - that doesn't seem like an ideal housing site to me.

It will link Ripley and Send diluting the character of the separate villages and contribute to urban sprawl.

The local roads cannot sustain the increased traffic given there are already frequent delays due to traffic.

There are minimal local transport facilities (bus services have been reduced and there is no train line) to support increasing the village size.

Ripley school has recently been closed down, and Send school is already full - where are the school places for more houses/ families.

Attached documents:

**Comment:** MM41  LPMM18/4965 **Respondent:** Sam Thompson 11042433  **Agent:**

MM27, MM41, MM42 and MM48, Transport Strategy

1344  of  2554
The local roads are narrow, already over congested and badly maintained. SendMarsh Road, Polesdon Lane and Newark Lane are busy commuting roads that constantly have pot holes that are not repaired. There is frequent gridlock and also no real public transport options as an alternative. The local area cannot sustain thousands more cars transiting in the area that would be the result of 770 more houses in the area.

The proposed changes to the A3 and Clandon slip roads do nothing to address these issues.

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<tr>
<td>MM42, Burnt Common, Policy A58</td>
<td>This item was deleted from the Local Plan in 2014 after mass objections but now comes back again bigger than ever?!?</td>
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<tr>
<td>Why? There is no justified local need with plenty of capacity at Slyfield industrial estate.</td>
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<td>The Employment Land Needs Assessments showed a reduction in demand for industrial land – do the local council pay any attention to what is actually needed?</td>
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<tr>
<td>Narrow local roads cannot accommodate large industrial vehicles and lorries.</td>
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<tr>
<td>MM44, Aldertons Farm, Policy A63</td>
<td>I am not sure where to begin with my objections here - in that this item is just so plain stupid!</td>
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<tr>
<td>Again, this item has made a comeback after previously having been withdrawn due to mass objections.</td>
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Yet again, it is a proposal to build on green belt land so contradicts MM9.

Sendmarsh Road is already a busy road that is not well maintained by the council with poor road quality, it cannot sustain increased traffic.

The area is extremely rural, with minimal public transport nearby (a bus that runs once an hour for a few hours a day is pitiful) - so such a development would likely need at least 2 cars per household assuming 2 adults per house as otherwise they could never get anywhere; there is not the space to park 200+ cars without destroying the character of the area.

The size of the development is frankly ridiculous and not in keeping with the area.

Attached documents:

Comment: MM48 - LPMM18/4967  Respondent: Sam Thompson 11042433  Agent:

MM27, MM41, MM42 and MM48, Transport Strategy

The local roads are narrow, already over congested and badly maintained. SendMarsh Road, Polesdon Lane and Newark Lane are busy commuting roads that constantly have pot holes that are not repaired. There is frequent gridlock and also no real public transport options as an alternative. The local area cannot sustain thousands more cars transiting in the area that would be the result of 770 more houses in the area.

The proposed changes to the A3 and Clandon slip roads do nothing to address these issues.

Attached documents:

Comment: MM9 - LPMM18/4963  Respondent: Sam Thompson 11042433  Agent:

MM9 Green Belt Policy

The council is trying to develop the green belt by simply relabeling parts of it as "no longer green belt" so that it can claim not have have built on green belt land; because that cannot be done without special circumstances - of which there are none in these instances.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Attached documents:

Comment: MM40 - LPMM18/6234  Respondent: Andrea Moran 11043809  Agent:

The NPPF has 3 strands: Economy, Infrastructure and Environment. Guildford Borough Councils Local Plan is still not fit for purpose legally on the environmental pillar of the NPPF.
I OBJECT to GBCs recommendation to dismember Biodiversity Opportunity Area (BOA) TBH06 by diminishing the SNCI at the heart of this BOA to a very small percentage of its recognised size since 2007. There is no ecological grounds for this ‘redrawing of the map’ as this site was reenforced as recently as 2016 by SyNP and the landowner. This move can only be an effort to overcome environmental law which might highlight the inappropriateness of a new town on this SNCI, in this BOA.

The current owners, WPIL bought the site as an SNCI, they have no grounds to reject its validity.

The picture below is Biodiversity Opportunity Area TBH06 as recognised by SyNP in 2015.

[see attachment for image]

BOA TBH06 includes an extensive 100+ hectare SNCI, as well as over 3,000 hectares of SSSI and SPA which include Ockham and Wisley Commons. The SNCI forms a critical buffer for the SSSI and increases the biodiversity and habitat diversity in the BOA. The SNCI which was enlarged to its approximate current size by GBC in 2007.

All versions of the local plan to date have recognised this SNCI in its entirety, with minor extensions recommended by SyNP in 2016 to the size of the SNCI.

The BOA and SNCI are endorsed by Surrey Nature Partnership SyNP since 2015, as part of the scoping of BOA TBH06 and reviewed and reenforced by SyNP in 2016 in a formal SNCI review carried out in conjunction with the land owners environmental researchers.

SyNP has assent from DEFRA since 2012 to create a positive plan for the environment as part of the NPPF, for Surrey County as part global climate change commitments and environmental protections such as Aichii 2020, the Paris Accord commitments and any new commitments needed for IPCC 2018 implementation.

The 25 Year environmental plan recently created and endorsed by Michael Gove and Theresa May, as part of Brexit exit strategies highlight the importance of the UK's environment and its singular importance above and beyond the needs of housing and local politics.

[see attachment for image, Fig 1: Excerpt from A Green Future: Our 25 Year Plan to Improve the Environment]

GBC needs to adopt the BOA TBH06 and safeguard its biodiversity intactness as part of the GBC local plan. Only in adopting the SyNP BOA TBH06 in the Local Plan, can GBC implement the required national and international environmental and climate change protection measures in the borough. GBC can not be permitted to undermine the recognised SNCI and attempt to build a new town on top of an SNCI in already protected by both greenbelt and being part of a defined Biodiversity Opportunity Area. Such action would be in contravention of the NPPF, Aichii 2020, The Paris Accord and the UKs newest 25 year Environmental Plan.

There are other strong grounds for protecting this SNCI:

1 The SNCI in BOA TBH06 includes at least 45.6 hectares of the Best and Most Versatile Agricultural Land in the country, -graded 2 and 3A. The farming of this land commercially for hundreds of years, possibly thousands of years, has not diminished its biodiversity intactness and it still qualifies as an SNCI in its entirety as assessed in 2016.

[see attachment for image, Fig 3: Land Classification of SNCI in BOA TBH06]

The farming of the land is contributing in a meaningful way to the food security of the the UK. Being in such close proximity to London and the South of England, this land contributes fully to BMV values of sustainable agriculture, close to its market and still contributing to biodiversity intactness.

The SNCI review in 2016 recognised the arable land contributions to this SNCI in plants found on site, in the birds found on the site. It required further specialist bird investigations to confirm that the SNCI included nationally significant BAP Biodiversity Action Plan level habitats for Arable land. The arable land is not restricted to the small corner of the SNCI that GBC proposes to ‘save’
The SNCI review in 2016 recognised the former tarred surfaces of an old airfield included in the SNCI formed valuable open mosaic habitat of national significance - also BAP Biodiversity Action Plan level habitats for open mosaic habitats. The open mosaic habitat is not restricted to the small corner of the SNCI that GBC proposes to ‘save’

2 The SNCI provides a catalogue of protected species, plants, and habitats it protects by its presence. Government is required to recognise its contribution to UK biodiversity intactness and its contribution to the global recovery of biodiversity and to counter the worst ravages predicted by climate change escalating past 1.5% global warming.

The SNCI creation and revalidation process creates and records a catalogue of biodiversity intactness on private land that may be inconvenient for landowners who wish to overturn its greenbelt protections, its SNCI status, undermine its BOA integrity. Because of the SNCI there is already a record of priority habitats, species, fungi, herbtofauna and plants that ensured that this area has been continuously monitored and protected by government agencies since it has fallen out of the direct control of the local farmers who safeguarded its biodiversity until 2015, when the desire to build a new town on the site escalated. Through this catalogue it is possible for environmentalists to ensure that ‘No Harm’ is done to the biodiversity on this site, and any such harm can be pursued through environmental law.

[see attachment for image]

The BOA has clear targets for the SNCI upto 2020 to ensure that it is protected by planning policy and in positive management. as seen below:

[see attachment for image]

It would be travesty of the NPPF and SyNP if GBC and WPIL, owner of the SNCI can be permitted to reduce the SNCI to a mere fraction of its currently endorsed size which was reconfirmed with the

3 The SNCI provides a buffer for the umbrella of protected land, water ways and ponds, species, plants, and habitat types it protects by its presence.

A: The body charged with the international protections of the SPA in the UK and in Surrey’s Thames Heath Basin, the JNCC and JSPB have over time undermined the planning protections at the critical barrier of 400m-2kms and between 2km and 5kms as highlighted in the concentric purple lines in the illustration below.owners co-operation as recently as 2016.

[see attachment for image]

Consequently there are very stringent protections of a 400 NO new buildings or threat from predatory domestic animals within 400m of an SPA protected for its birdlife.

There continues to be protections in place for a general buffer of 400m-5KM limiting housing developments and a requirement for developers granted permission to build incompatible developments inside this buffer to pay a contribution to the maintenance of the SPA.

The recognition of the 400m-2km buffer however is the critical loss, it would have prevented the plans for a new town on this SNCI, and instead focussed attention on promoting its biodiversity intactness.

The planned development on this SNCI includes 2000 houses, a primary school, a secondary school, 2 nursery schools, car parking for 4000 resident cars, a visitor centre, a care home for 100 people, shops, an eatery.

It is estimated this new population will bring 800+ cats and 950+ dogs to area between 400meters and 800meters from the boundary of the SPA. Local birdwatchers have catalogued on recognised bird watching sites in the UK, over 116 different bird species in the vicinity of the SNCI. IF 800 cats without adequate garden space are located on the same site as 116 different bird species, the impact on the bird population and nesting patterns of these ground nesting birds in SNCI and in the SPA will be fundamentally damaged. it prevented big housing developments inside the cat predation zone of the SPA. The greenbelt should be doing this job in the location of the BOA TBH06, however GBC wish to undermine this protection.

B: The protection of habitats from Climate change impacts should be prioritised over houses which can better compensate for flooding
The red zone is safe for habitats even through climate change, it should not be prioritised for housing.

C: To protect the local aquifer and drinking water which could be adversely impacted by development and should be safeguarded to help minimise the impacts of climate change.

D: to Protect adjacent habitats and locally protected species and plants:

Destroying the existing SNCI is against all environmental protections.

It fails to recognise the legal weight of environmental law such as ‘People Over Wind’ or the 2016 ‘Briel’ judgement in recognising the legal protections in place to safeguard environmentally protected land, habitats and species There is still no positive plan for safeguarding and enhancing the biodiversity intactness of sites of strategic importance nationally and internationally within the borough.

There is still no positive plan for safeguarding and enhancing Best and Most Versatile Land in the Borough for current and future generations.

The sites with the greatest biodiversity intactness scores in the borough, such as Biodiversity Opportunity Area TBH06 Ockham in the current Local Plan are with the greatest burdens for high density Housing, schooling, Strategic road Infrastructure expansion in the Borough.

TBH06 being is one of the most inaccessible places in County of Surrey and has extremely low sustainability scores for meeting the commuter, urban amenities and urban infrastructure connectivity needs of a resident population in a cost effective way. The local plan has still not recognised this major problem.

The close proximity of Junction 10, without an effective commuter connectivity solution reduces THB06 to an isolated car dependent commuter town with a traffic spur from the A3 providing a skeletal traffic infrastructure for 4000+ new cars along a single carriage way through the new town. Not only will this be detrimental to the health and viability of TBH06, this vanity project has still not raised planning concerns about NOx for children living, walking, going to school and doing all their sport and leisure activities in this heavily polluted microcosm, despite By contrast, TBH06 is ideally set up as a London Metropolitan greenbelt destination for ecotourism, climate change research, educational enrichment programs for students at all levels. It is in close proximity to Junction 10 of the A3/M25, allowing access from London, Guildford and Surrey as well as easy access to Heathrow and Gatwick. It includes RHS Wisley.

Even the latest version of he GBC Local plan only focuses on Economic growth and housing to the detriment of the environment, and infrastructure.

1 The housing target has not dropped in proportion to the fall in the ONS housing projections.
2 The SNCI at Former Wisley Airfield being downsized to make way for a housing estate
3 Despite the falling ONS housing numbers and the increase in sites in the centre of Guildford, The Former Wisley Airfield, a remote unsustainable site greenbelt SNCI site, adjacent to an SPA has not been dropped from the plan, despite being rejected in 2018 by the Secretary of State.
4 People Over Wind, Article 6(3), 6(4) Precautionary principle: No net harm can be compensated or core component mitigated in case of Natura2000 site Briel 2016 highlight the courts increasing power to legislate in favour of environmental protection. Research backs this up highlighting that old biodiversity takes 100-1000 years to be replaced and can only be successful on very large ratios of swap land (1:20+) and even then is only up to 40% successful. Research has proven that old declining and vulnerable biodiversity is a better option than attempts to transpose/recreate habitats even without being planted into a hostile environment. There has been no proof a housing estate in close proximity to the SPA will be successfully mitigated. There is no proof that Environmental Impact Assessments and Statements effectively mitigate against damage. There is no proof that land swaps work, there is no proof that there ratios for offset land works, there is no proof that a SANG can be co-located with an SNCI, and a resident leisure population of 5000 humans and a
resident population of approx 900 cats and approx 800 dogs and an office block and a primary school and a secondary school and 2 nursery schools, and a visitor centre and 4000+ cars and through traffic and its associated pollution. Pressure for action on Climate Change, Housing Demand:- ONS figures for needed new homes have dropped by 40% in Guildford in 2018, while pressure for rapid and drastic action on climate change and environmental safeguarding have been escalated by the IPCC paper in October 2018, pressure is on M Gove to provide solutions. This drop in housing need is good for the planet and the UK economy. Climate change needs to be turned around globally within the life of this GBC Local Plan. There is no positive plan for climate change in this GBC local plan. The current GBC local plan includes dramatic negative environmental plans for GBC during this Local plan which includes building new car dependent towns in rural countryside, on top of existing areas of nationally and internationally significant biodiversity intactness. Houses can be build on boats and on stilts, nature can’t. The local plan needs to leave the nature where it is, on land un threatened by climate change.

in the next 12 years. Globally the ‘Impacts on people’s health, livelihoods, food security, water supply, human security, and economic growth are projected to increase with global warming of 1.5°C and increase further with 2°C. Limiting global warming to 1.5°C is expected to reduce the number of people in poverty by up to several hundred million by 2050, and to reduce the number of people globally exposed to water stress by 50%’ Stockholm Resilience Centre.

The NPPF pillar to support environment is badly needed in the UK. It is Surrey Nature Partnership role, as given assent by DEFRA in 2012 to fulfil this obligation. Building sustainable food sources close to London and safeguarding pollinators, wildlife and climate stability can be now prioritised in the GBC local plan as IPCC directives give us just 12 years - the local planning period to effect change. The ONS drop in housing need can be directly diverted from housebuilding towards government should use these latest ONS figures to divert resources from housing towards climate change targets in reducing c02, 22/10/2018 - The world’s consumption of raw materials is set to nearly double by 2060 as the global economy expands and living standards rise, placing twice the pressure on the environment that we are seeing today, according to a new OECD report… the projected increase in the extraction and processing of raw materials likely to worsen pollution of air, water and soils, and contribute significantly to climate change.

The nationally and internationally significant biodiversity intactness of the Former Wisley Airfield, which is entirely an SNCI, and its immediately rich hinterland which is a Biodiversity Opportunity Area, an SSSI, an SPA, an LNR, and has pockets of Ancient Woodland, is wasted on housing. There is no local need for 2000 houses. The Former Wisley Airfield is at the heart of the very rural historic Ockham village. Ockham is not on the outskirts of an urban centre, it is remote and rural, without footpaths, streetlights, without a single shop. Exceptional circumstances do not exist in this remote location for car dependent homes in this greenbelt location where no efficient public transportation solution can solve the very significant hidden costs for householders to this location: multiple transportation links, time wasted on commuting, unreliable connections, no local mass employer, no urban infrastructure, no urban amenities, no significant retail options.

The NPPF is about the harmony between Infrastructure, Economy and Environment. IPCC and Paris Accord remind us of the dire state of the planet and the rapid need - in the next 12 years - to start living within the limits of the planets resources. Building 40% more houses than the ONS projects as needed is in direct contravention of the NPPF, the 25 year plan for nature in the UK, Aichii 2020, the Paris Accord. On the 6pm News on radio 4, 22nd October 2018

Chronic housing shortages have been talked up in Guildford for nearly 10 years. The facts don't back up the talk but back up the ONS figures and the NHS figures.

Are population projections real:
NHS Data records 200,000 patient records across Guildford and Waverley together. Guildford claims a population of 150,000 and Waverley claim a population of 120,000. How many of these 70,000 unaccounted for people are actually not registered with a GP in Waverley Guildford because their permanent home is elsewhere: those in prisons, old people homes, universities, Further Education Colleges, seasonal visitors?

[see attachment for images]

Pegasus wrote the Sites allocations document for GBC.
This is how Pegasus sees the impact of their work in Guildford:
Andy Meader, director of consultancy Pegasus Group, said that recent case law had established that the intensity of housing need was a key factor in demonstrating the exceptional circumstances required to justify green belt release in local plans.

"In other words, the greater the shortage of housing, the more exceptional the circumstances are likely to be," Meader said.

"If the objectively-assessed need is suddenly to reduce for any reason, then that can have implications."

"It is a very significant consideration," Meader said, which could have "a fundamental impact" on councils' ability to demonstrate exceptional circumstances.

Other key factors needed to demonstrate exceptional circumstances, he said, included fully investigating alternative sources of development in the area.

"It’s going to be very important to have undertaken those exercises," he said. "Otherwise, there is the potential criticism that you just don’t really know what potential there is."

Meader, whose firm has recently carried out a green belt review for Guildford Borough Council, added that authorities wanting to make green belt releases should justify such changes both in principle and on an individual site basis in order to demonstrate exceptional circumstances.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Yes Mr Kit will seek to change the goalposts again to support the UK building trade but these houses will not be for locals but permitting the enlargement of the stock of dormant UK houses and homes held by international buyers and investors, as financial assets around the world, not to enable those living in the UK to live here in their own home. To change numbers of UK people owning their own homes Mr Kit needs to change what houses are build and where they are built.

Criteria for assessing new site validity is different to old criteria. All sites new and old need to be measured against same criteria to ensure that the threshold for reaching exceptional circumstances on greenbelt land has indeed been met.

SNCI: map says marking out spa buffer zone, but actually obscures SNCI detail on site A35, it also ignores need to outline ancient woodland and LNR and SSSI, it doesn’t indicate BAP priority habitats for which the SNCI is recognised, it doesn’t show that this is a medium aquifer and protected water zone and it doesn’t show that this is also a Biodiversity Opportunity area.

SNCI has been renegotiated by Surrey Wildlife Trust, however it is the Surrey Nature Partnership who has the Assent from DEFRA to implement the Biodiversity 2020 programme and consequently the environmental pillar of the NPPF in Surrey and the national 25 year Plan for biodiversity and the Environment:

[see attachment for image]

About Surrey Nature Partnership
SyNP is one of England’s 48 Local Nature Partnerships, recognised by Defra in 2012. Our Vision is to see a healthy natural environment throughout Surrey supporting economic and social benefits.

Our Mission is to hard wire recognition of the value of the natural environment into all decision making resulting in more informed decisions for Surrey. It will increase recognition of the value of our natural capital and ecosystems as critical assets for Surrey, as important as its financial, social and other capitals, and promote the need for thoughtful, sustainable management of these assets.

The Investment Plan
In November 2015 SyNP published Naturally Richer: A Natural Capital Investment Strategy for Surrey, which set the
direction for managing Surrey’s natural assets. The Natural Capital Investment Plan (NCIP) sets out how SyNP will achieve healthy natural capital in Surrey over the next 25 years.

The size of the conservation impact investment market within which the NCIP will operate has been growing exponentially for a number of years, particularly in the USA where the Nature Conservancy has developed a systematic approach to nature conservation investing through Naturevest. Most recently a report on the scale of private investment into conservation showed that the total size of private capital now committed is $8.2 billion and this has increased by 62% over the period 2014/15 (State of Private Investment in Conservation 2016). This in itself shows the scale of the investment opportunity and when coupled with the social and environmental benefits is an important element in achieving the objectives of the NCIP.

Further work to understand the size of this opportunity in Surrey and SE England is required as part of preparing the full NCIP.

Objectives of the Investment Plan
The NCIP will:

- Identify the existing natural capital assets in Surrey as well as giving an assessment of their condition.
- Provide an understanding of the level of functionality of these assets and how far below critical functioning threshold they are.
- Outline the mechanisms to achieve capital investment for uplift of the assets to a viable, functioning threshold (assuming most assets are currently below viable).
- Proactively link the demand side (need for funding of natural capital assets through conservation projects) with the supply side (investors seeking investments with conservation impact) by promoting a deeper mutual understanding between investors and providers of conservation projects to deliver scalability as well as developing mechanisms for capital investment.
- Develop the potential mechanisms to provide a revenue flow to maintain the assets in the long term (through e.g. NaturEtrade).
- Provide a clear set of actions for the period 2017 to 2022. The plan will operate within the context of the 25 year Environment Plan, Housing White Paper and Industrial Strategy.

https://getinvolved.guildford.gov.uk/gf2.ti/a/818146/126662/PJP/-/Pages_from_Guildford_borough_Proposed_Submission_Local_Plan_2017_and_Appendices_AG_Page_1.jpg

https://getinvolved.guildford.gov.uk/gf2.ti/a/818146/126661/PJP/-/Pages_from_Guildford_borough_Proposed_Submission_Local_Plan_2017_and_Appendices_AG_Page_2.jpg

Throughout this latest round of consultation and each previous consultation, including the inspectors hearing on the GBC Local Plan, the people of guildford Guildford Vision Group, Guildford Residents Association, Guildford Society, parish councils, resident associations, ramblers groups, CPRE, etc are united in condemning this housing for housing sake plan.

No-one is objecting to realistic housing targets, the people of Guildford are united in objecting to mass off-grid housing estates that serve no economic area and are served by no retail areas and have no urban infrastructure.

[see attachment for image]

There is no sustainable transport corridor for this site at Three farms meadows. the people of Guildford want the latest NPPF to be respected and the third pillar of the NPPF, the environmental sustainability to be recognised as having equal weight economy and infrastructure.

There is no basis to shrink the SNCI on Three Farms Meadows to facilitate a housing estate for 2000 homes. This site is in a Biodiversity opportunity Area for the following reasons:
where the household running costs are exponentially higher because the planned homes are too far removed from sustainable and effective transportation

There should be no possibility to build a town next on Three Farms Meadows, the former Wisley Airfield according to the revised NPPF:

It is in the London Metropolitan Greenbelt
It has no SNCI with 9 UK Biodiversity Action Plan (UK BAP) Priority Habitats on the site
Ancient Woodland
The site is only xx hectares of which 45.6 are UK Best and Most Versatile Agricultural land
The entire site is within 800 meters of an SPA and SSSI
The site abuts one of the largest and most important junctions in the UK: Junction 10 of the A3/M25, transit point between London, Heathrow, Gatwick and the South
The site is on a plateau, overlooked by the Surrey Hills AONB

Lower housing need figures could have 'fundamental impact' on green belt release, conference told

10 October 2018 by David Dewar

Reduced housing need arising from the latest household projections could make it harder for councils to demonstrate the exceptional circumstances needed for green belt changes, the Planning for Housing conference was told yesterday. Andy Meader of Pegasus Group speaking at yesterday's Planning for Housing conference Andy Meader of Pegasus Group speaking at yesterday's Planning for Housing conference

Andy Meader, director of consultancy Pegasus Group, said that recent case law had established that the intensity of housing need was a key factor in demonstrating the exceptional circumstances required to justify green belt release in local plans.

"In other words, the greater the shortage of housing, the more exceptional the circumstances are likely to be," Meader said.

"If the objectively-assessed need is suddenly to reduce for any reason, then that can have implications,"

"It is a very significant consideration," Meader said, which could have "a fundamental impact" on councils' ability to demonstrate exceptional circumstances.

Other key factors needed to demonstrate exceptional circumstances, he said, included fully investigating alternative sources of development in the area.

"It’s going to be very important to have undertaken those exercises," he said. "Otherwise, there is the potential criticism that you just don’t really know what potential there is."

Meader, whose firm has recently carried out a green belt review for Guildford Borough Council, added that authorities wanting to make green belt releases should justify such changes both in principle and on an individual site basis in order to demonstrate exceptional circumstances.

Mark Andrews, planning and housing policy manager at Coventry City Council - whose recently adopted local plan released green belt land for 7,000 homes - said that key tips for carrying out a green belt review included having a clear and consistent methodology and working with a wide range of stakeholders.

He also advised that those undertaking reviews should have realistic expectations.
"Your review will never be accepted by everyone and it will never be perfect," Andrews said. "If you go into the process thinking 'I've got to make this right for everyone and I've got to get everyone to like what comes out of this green belt review,' you will set yourself up to fail.

"The most important thing is to be happy yourself that the information you have collected is evidence that you are comfortable with and works for you as an authority," he said.

Paragraph 136 of the final says: "Once established, green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans". Paragraph 137 sets out these exceptional circumstances, including a test of whether the local authority has made as "much use as possible of suitable brownfield sites and underutilised land" and, through strategic policies, "optimises the density of development" in existing built-up areas.

While planning authorities should consider the construction of new buildings in the green belt as "inappropriate", the new framework now countenances such exceptions as affordable housing "for local community needs" set out in development plans or development on brownfield land that does "not cause substantial harm to the openness of the green belt”.

Attached documents: A Moran Rep_Redacted.pdf (10.6 MB)

Comment: MM2 - LPMM18/4412  Respondent: Christopher Barrass 11044129  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.
Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.
MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/4415  Respondent: Christopher Barrass 11044129  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4422  Respondent: Christopher Barrass 11044129  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/4413  Respondent: Christopher Barrass 11044129  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.
1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/4416  Respondent: Christopher Barrass 11044129  Agent: 

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4417  Respondent: Christopher Barrass 11044129  Agent: 

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4418  Respondent: Christopher Barrass 11044129  Agent: 

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/4419  Respondent: Christopher Barrass 11044129  Agent: 

1358 of 2554
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/4420  **Respondent:** Christopher Barrass 11044129  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment:** MM44 - LPMM18/4421  **Respondent:** Christopher Barrass 11044129  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment:** MM9 - LPMM18/4414  **Respondent:** Christopher Barrass 11044129  **Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/3099  **Respondent:** Gesh Doyle 11046017  **Agent:**

I am a resident of Send Marsh and object to the following Main Modifications to the local area.

MM41 - Land at Garlicks Arch, Send Marsh, policy A43

I **object** to this on the following grounds;

- This is Green Belt land
- proposed new development is excessive
• it will destroy the ancient woodland at the site
• Will further add to the existing flooding issue
• Extra cars will block up the existing busy roads
• Impact the already strained local services such as schools and medical facilities

Attached documents:

Comment: MM42 - LPMM18/3100  Respondent: Gesh Doyle 11046017  Agent:

MM42 - Land at Burnt Common, London Road, Send, policy A58

I object to this on the following grounds;

• Area has doubled from previous expansion proposals
• No need for new industrial site when extra capacity at Slyfield is not used
• Will result in already busy narrow local roads being further gridlocked

Attached documents:

Comment: MM44 - LPMM18/3101  Respondent: Gesh Doyle 11046017  Agent:

MM44 - Land at Alderton’s Farm, Send Marsh Road, policy A63

I object to this on the following grounds;

• This is Green Belt land
• The additional traffic together with other proposed developments will further gridlock crossroad
• The existing poor drainage and flooding of local gardens will worsen
• With other locally proposed new development, this will result in a 45% increase to Send, for a small village this is too high
• Extra cars will block up the existing busy roads
• Impact the already strained local services such as schools and medical facilities

Attached documents:

Comment: MM9 - LPMM18/3102  Respondent: Gesh Doyle 11046017  Agent:

MM9 - Green Belt policy

I object to this on the following grounds;

Any modifications to definition of Green Belt should be done following a parliamentary review

Attached documents:
**Comment: MM45 - LPMM18/2001  Respondent: Judith Shaw 11046721  Agent:**

I wish to make register the following objections to Main Modification 45, the proposal to build 105 houses on Green Belt land between Normandy and Flexford:

- this is Green Belt land and should remain so to preserve the historical boundary between the two settlements;

- the existing roads could not sustain the additional traffic during the building process or when the new homes are occupied. NB there are no shops at all in the immediate area and no buses down Glaziers Lane so people do rely on cars to get to shops etc - hence the very real concern about increased traffic;

- the existing facilities would not be able to meet the demands of the additional families - ie the doctor's surgery on Glaziers Lane where existing patients already have to wait three weeks for an appointment and Wyke Primary School (for 105 homes it would be reasonable to expect at least 75 children - two and a half classes worth in a primary school).

**Attached documents:**

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**Comment: MM27 - LPMM18/3720  Respondent: Peter McGowan 11047201  Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

The proposed A3 amendments and the Clandon slip roads do not properly address the impact of traffic for Send of development proposals for Aldertons, Clockbarn, Burnt Common and Garlick's Arch in addition to Gosden Hill and Wisley/Ockham. There is no adequate analysis of the total traffic implications on Send Barns Lane and Send Road especially taking into account the fact that thousands more cars will transit the area daily, bringing about increased noise and chemical pollution as well as delays, which noticeably have increased significantly over the 18 years that I have lived in the area, at the expense of residents and the natural environment.

**Other Developments**

The consultation only permits commentary on the principal changes and thus denies residents the opportunity to object again to 40 houses and a travellers' site on Send Hill, 60 Houses at Clockbarn in Tannery Lane and a 25 per cent increase in the size of the Send Business Centre notwithstanding the existence of the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

As a general point, many of the amendments can only be viewed without the context of appropriate infrastructure, with mention only being made that consideration need only be given to issues, including schools. It is unreasonable and unfair to put the amendments forward without mention of the infrastructure needed to support the original proposals, earlier modifications and these modifications.

**Attached documents:**

---

**Comment: MM41 - LPMM18/3723  Respondent: Peter McGowan 11047201  Agent:**

**MM41 Land at Garlick's Arch, Send Marsh, Policy A43**
Approximately 7000 objections to the previous proposed number of 400 have been ignored and now 550 homes are proposed, which is an excessive 37 per cent. The land comprises Green Belt and ancient woodland. It is inappropriate for this land to be developed for these reasons and also because it is significantly polluted by lead shot and prone to frequent flooding. The modifications will have the effect of connecting Ripley and Send and therefore represent over development as well as leading to at least 800 additional cars congesting local roads. It will also place a significant strain on local infrastructure - in particular, schools and medical services - which as referred to above, is an issue that is inadequately addressed in the modifications and the overall proposals.

Attached documents:

**Comment:** MM41 - LPMM18/3726  **Respondent:** Peter McGowan 11047201  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

The proposed A3 amendments and the Clandon slip roads do not properly address the impact of traffic for Send of development proposals for Aldertons, Clockbarn, Burnt Common and Garlick's Arch in addition to Gosden Hill and Wisley/Ockham. There is no adequate analysis of the total traffic implications on Send Barns Lane and Send Road especially taking into account the fact that thousands more cars will transit the area daily, bringing about increased noise and chemical pollution as well as delays, which noticeably have increased significantly over the 18 years that I have lived in the area, at the expense of residents and the natural environment.

**Other Developments**

The consultation only permits commentary on the principal changes and thus denies residents the opportunity to object again to 40 houses and a travellers' site on Send Hill, 60 Houses at Clockbarn in Tannery Lane and a 25 per cent increase in the size of the Send Business Centre notwithstanding the existence of the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

As a general point, many of the amendments can only be viewed without the context of appropriate infrastructure, with mention only being made that consideration need only be given to issues, including schools. It is unreasonable and unfair to put the amendments forward without mention of the infrastructure needed to support the original proposals, earlier modifications and these modifications.

Attached documents:

**Comment:** MM42 - LPMM18/3721  **Respondent:** Peter McGowan 11047201  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

The proposed A3 amendments and the Clandon slip roads do not properly address the impact of traffic for Send of development proposals for Aldertons, Clockbarn, Burnt Common and Garlick's Arch in addition to Gosden Hill and Wisley/Ockham. There is no adequate analysis of the total traffic implications on Send Barns Lane and Send Road especially taking into account the fact that thousands more cars will transit the area daily, bringing about increased noise and chemical pollution as well as delays, which noticeably have increased significantly over the 18 years that I have lived in the area, at the expense of residents and the natural environment.

**Other Developments**
The consultation only permits commentary on the principal changes and thus denies residents the opportunity to object again to 40 houses and a travellers' site on Send Hill, 60 Houses at Clockbarn in Tannery Lane and a 25 per cent increase in the size of the Send Business Centre notwithstanding the existence of the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

As a general point, many of the amendments can only be viewed without the context of appropriate infrastructure, with mention only being made that consideration need only be given to issues, including schools. It is unreasonable and unfair to put the amendments forward without mention of the infrastructure needed to support the original proposals, earlier modifications and these modifications.

Attached documents:

Comment: MM42 - LPMM18/3727  Respondent: Peter McGowan 11047201  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

This proposal was deleted from the 2014 plan and subsequently has increased twice and has doubled in size from 700 sq m to 14,800 sq m of industrial storage. This is unreasonable and unjustifiable given the the Employment Land Needs Assessment indicated a reduction in demand for industrial land. There is no need to put new industrial sites in the Green Belt when Slyfield has unused capacity. There are no special circumstances, and so it contradicts MM9, referred to above. This represents the largest industrial apportionment in any village in the borough and is on top of a 25 per cent increase at Send Business Centre, with no demonstrable demand. The modifications will place significant stress on neighbouring roads and will increase traffic congestion dramatically and increase nitrogen dioxide levels which are already dangerous.

Attached documents:

Comment: MM44 - LPMM18/3725  Respondent: Peter McGowan 11047201  Agent:

MM44 Land at Alderton's Farm, Send Marsh Road Policy A63

This is a Green Belt site with no special circumstances and so it violates policy MM9. It should be pointed out that the proposal for 120 homes (including some self-build) was deleted from the earlier draft because of the objections received and now has been re-inserted following the public examination in July. Infrastructure will be unable to accommodate the proposals due to the fact that alongside Garlick's Arch (550), Winds Ridge (40) and Clockbarn (60) it adds 770 houses to the 1700 houses already in Send (a 45 per cent increase). Send Crossroads will not be able to deal with the additional traffic. There are beautiful heritage buildings at Send Marsh Green which I have enjoyed for many years and the proposals will detract significantly from these buildings. I have enjoyed using the public footpath running through the fields at Alderton's Farm and broad rural views will be lost and replaced with over development. There are also many species of birds and insects that inhabit the nearby woodlands of Alderton's Farm and this habitat will be negatively impacted by this development. There is a significant population of bats in the area and these developments will have a negative impact on them.

Attached documents:

Comment: MM48 - LPMM18/3722  Respondent: Peter McGowan 11047201  Agent:
MM27, MM41, MM42 and MM48 Transport Strategy

The proposed A3 amendments and the Clandon slip roads do not properly address the impact of traffic for Send development proposals for Aldertons, Clockbarn, Burnt Common and Garlick's Arch in addition to Gosden Hill and Wisley/Ockham. There is no adequate analysis of the total traffic implications on Send Barns Lane and Send Road especially taking into account the fact that thousands more cars will transit the area daily, bringing about increased noise and chemical pollution as well as delays, which noticeably have increased significantly over the 18 years that I have lived in the area, at the expense of residents and the natural environment.

Other Developments

The consultation only permits commentary on the principal changes and thus denies residents the opportunity to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Lane and a 25 per cent increase in the size of the Send Business Centre notwithstanding the existence of the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

As a general point, many of the amendments can only be viewed without the context of appropriate infrastructure, with mention only being made that consideration need only be given to issues, including schools. It is unreasonable and unfair to put the amendments forward without mention of the infrastructure needed to support the original proposals, earlier modifications and these modifications.

Attached documents:

Comment: MM9 - LPMM18/3719  Respondent: Peter McGowan 11047201  Agent:

MM9 Green Belt policy

These modifications involve a test that is not objective with respect to the exception for enabling "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village". This exception is a significant loophole to the protection afforded to the Green Belt and this derogation from the protection of the Green Belt could easily be exploited by developers to the detriment of residents. It renders the Green Belt protection meaningless.

Attached documents:

Comment: MM2 - LPMM18/2908  Respondent: Hazel Corstin 11047329  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2.1 Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2.2 There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways
England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing route.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)

2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph

3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.

4. The sight lines for the exit of the Onslow Arms car park

5. The narrowness of the road near Summers

6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement

7. The sharp bend near Clandon Regis

8. The narrowness of the road at the Bull’s Head

9. The Clandon Junior School and the, in places, narrow footpath for children walking to school

10. The sharp bend with poor sight lines in either direction at the church

11. No continuous footpath through the length of the village

12. The speed of traffic

13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.
1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2911  Respondent: Hazel Corstin 11047329  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/2919  Respondent: Hazel Corstin 11047329  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

**Comment: MM3 - LPMM18/2909  Respondent: Hazel Corstin 11047329  Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

**Comment: MM3 - LPMM18/2918  Respondent: Hazel Corstin 11047329  Agent:**

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

**Comment: MM31 - LPMM18/2912  Respondent: Hazel Corstin 11047329  Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment: MM32 - LPMM18/2913</th>
<th>Respondent: Hazel Corstin 11047329</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM32 A height limit for <strong>White Lion Walk</strong> is required.</td>
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<th>Comment: MM33 - LPMM18/2914</th>
<th>Respondent: Hazel Corstin 11047329</th>
<th>Agent:</th>
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<tr>
<td>MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at <strong>Slyfield</strong> and green roofs for commercial buildings within the site to minimise impact on views from the AONB.</td>
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<th>Comment: MM35 - LPMM18/2915</th>
<th>Respondent: Hazel Corstin 11047329</th>
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<tr>
<td>MM35 <strong>Gosden Hill Farm</strong> should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.</td>
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<td>MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.</td>
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<td>MM35 If some early development occurs at <strong>Gosden Hill</strong> to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.</td>
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<th>Comment: MM41 - LPMM18/2916</th>
<th>Respondent: Hazel Corstin 11047329</th>
<th>Agent:</th>
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<tr>
<td>MM41 <strong>Garlick’s Arch</strong> should be retained as Green Belt in view of the revised housing need, rather than expanded.</td>
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<th>Comment: MM44 - LPMM18/2917</th>
<th>Respondent: Hazel Corstin 11047329</th>
<th>Agent:</th>
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<tr>
<td>MM44 The new Green Belt site at <strong>Send</strong> is not justified in view of the revised housing figures.</td>
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Comment: MM9 - LPMM18/2910  Respondent:  Hazel Corstin 11047329  Agent:

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

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Comment: MM13 - LPMM18/4308  Respondent:  Steve Lawson 11047713  Agent:

MM13

The projected need for retail space is just not accurate and should be cut to make room for urban homes. The projections presented are not true today and seem to ignore how high streets are evolving with the rise of online shopping etc.

Attached documents:

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Comment: MM2 - LPMM18/4303  Respondent:  Steve Lawson 11047713  Agent:

MM2

I object to the identification of the HMA with the tri-borough area of Woking/Guildford/Waverley. This is not justified in terms of where residents live, work, shop, commute etc. The need to include Woking’s unmet housing need is therefore based on an incorrect premise.

It is untrue that the OAN has been based on the latest 2018-based population projections. To meet this reduced OAN, the balance of urban development should be shifted away from the retail sector towards building homes, in line with government policy, uplifting the Guildford Town Centre figure considerably.

GBC have claimed that the new ONS figures are inapplicable because the submitted local plan pre-dates the government’s new standard method for calculating housing need. The plan should be based on the best and latest evidence available and needs to adapt in line with the facts which ONS presented.

Attached documents:

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Comment: MM23 - LPMM18/4309  Respondent:  Steve Lawson 11047713  Agent:

MM23

The changes to Policy D1 play down some vital social requirements, set out in national policy, that aim to make development sustainable. Provisions on walking distances and cycle routes have been deleted and replaced giving opportunity for developers to exploit with socially unsustainable building.

Similarly, Policy D4 should not have been deleted as it met the soundness test."

I hope this is given due consideration and happy to discuss by phone.
Policy S3 needs to be improved and more thought out. Most of the borough’s population live in the Guildford urban area. Urban regeneration should be a focus of the plan. This would be consistent with national policy. The current wording is too lose and open to interpretation and ambiguity.

It needs -

- to make plain that the town’s character, can only be protected with a height limitation to about 4 storeys.
- to make more explicit the link between giving priority for pedestrians and cyclists over motor vehicles and more realistic, higher housing densities that incentivise walking and cycling, rather than low-rise, suburban-type homes in the town centre with gardens and garages. This is achievable.
- to prioritise residential over retail

The viability exception (2) is too permissive. It is open to abuse and does not protect the countryside.

Development in the Green Belt should be restricted in accordance with the NPPF. This policy appears to broaden loopholes in Green Belt protections beyond the exceptional circumstances permitted in the NPPF.

MM9 adds ambiguous interpretation to national policy which confuses what is and is not permitted.

There is a clear absence of any positive defence of the Green Belt, despite this covering 81% of the borough’s area!! As currently worded, MM9 risks going completely against the sensitive balance between protection and development set out in national policy. In setting and settlement boundary extension on this major scale is unnecessary.
My objections to the amendments to the Plan principally concern the amount and type of development proposed in the Send area, which appear to disproportionately target the village. I am also firmly of the view that the "need" for such development, both as regards housing and industrial use, has been grossly over-exaggerated by Guildford Borough Council (GBC), in a developer rather than need-led plan. The Plan is unsuitable for purpose, especially in the light of figures from the Office of National Statistics, (ONS), published as recently as 20th September 2018.

I understand that objections at this stage have to be confined to amendments to the Plan. I object specifically to the following, which I will list in order of the size of the proposed developments:

MM41, land at Garlicks Arch, between Ripley and Send Marsh, Policy A43;
MM42, proposed increased industrial use at Burnt Common, London Road, Send, Policy A58;
MM44, Alderton's Farm, Send Marsh Road, Policy A63;
MM9, Green Belt considerations;
MM27, MM41, MM42 and MM48, Transport Strategy in the Send, Ripley and Woking areas.

Objectively assessed need for dwellings, (OAN).

GBC utilised a firm of consultants, GL Hearne, to calculate the anticipated need over the period of the Local Plan. This was revised a number of times, eventually by the start of the Public inquiry into the Plan being assessed as 594 dwellings to be be built per annum (DPA). Repeated attempts were made by responsible interested organisations, such as The Guildford Society, Guildford Residents Association, Guildford Greenbelt Group, Save Send Action Group, Ockham Residents' Association, to be shown how this figure was arrived at. All bona fide groups with a need, not merely an interest, in seeing the logic used in reaching the figure arrived at so that they could if appropriate, challenge it. All were rebuffed. Confidentiality was cited, which seems an utterly bizarre explanation. Hence these bodies, as well as concerned individuals, had to make objections without even seeing the Council's argued case as regards assessed need. A highly unfortunate and undesirable position, inconsistent with the Council's oft-stated position of open local government. I am not aware whether any Freedom of Information request was made by any of these bodies or interested individuals, but if the Council was confident in its and G.L Hearne's methodology then I suspect it would have been only too willing to divulge this information. This smacked of wholly unnecessary secrecy at the time, and recent events have proved that suspicion to be well-founded.

At the Public Inquiry into the Plan in June/July 2018, the Inspector, Jonathan Bore, stated that he would use the most up-to-date figures to decide housing need, and that the proposed housing need figures were PROVISIONAL until the release of updated Office of National Statistics figures. He did however add that it was unlikely that the OAN would be found to be less than 594 dwellings per annum. On the information available to him at that time, the Inspector assessed the need as 789 dwellings per annum over the lifetime of the Plan. The ONS figure released on 20th September hugely reduces this figure to 431 DPA needed. This confirms what the large number of objectors present at the Inquiry had been arguing - housing need had been greatly over-estimated in the Plan, which is thus now manifestly unfit for purpose and needs to be drastically revised. This was confirmed by the eminent consultants Barton Willmore in their "Intelligence", also dated 20th September:-

"Housing need will fall in the light of household projections."

Their commentary continued:-

"Governments' proposed standard method for assessing housing need in Local Authorities is predominantly informed by household projections produced by the Office for National Statistics".

The response by GBC, from Leader Councillor Spooner to this was [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] he went on to say regarding the Government's new standard method in calculating housing need...
"under the transitional provisions of the National Planning Policy Framework the new standard method does not apply to the examination of the Guildford Local Plan".

Essentially he is saying we do not have to apply the latest revised figure of housing need [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Attached documents:

Comment: MM27 - LPMM18/5896  Respondent: Patrick Oven 11048481  Agent:

MM27, MM41, MM42 and MM48 - Transport Strategy.

GBC has grossly underestimated the effect on the local roads of the proposed developments discussed above and the other developments proposed in the Plan at Clockbarn Nurseries, Send Hill and the expansion of the Send Business Centre in Tannery Lane, which are not the subject of amendments and so precluded from discussion here. At the Public Inquiry GBC indicated only a minor increase was anticipated in traffic through Send on the A247 was anticipated. That totally fails to take into account that such huge development has to bring a large increase in both car and HGV traffic, which can only use the existing roads - no new ones are proposed. The proposed 4 way slip roads at the Burnt Common Clandon slip, currently only a northbound exit and a southbound joining will inevitably lead to increased traffic through Send. At present, traffic on the clockwise M25, bound for Woking generally leaves at junction 11. It is possible leave at junction 10 and take the A3 for a mile, leaving and going through Ripley, then Send and Old Woking. However the bottleneck that Ripley presents at busy times morning and evening at present dissuades this. Traffic turning right into the very narrow entrance to Newark Lane, heading for Pyrford and Byfleet, blocks the High Street, causing tailbacks that often stretch back to the A3 junction. GBC has completely failed to take into account that the provision of the 4 way slips at Burnt Common will also serve a new road from the proposed large development at Wisley Airfield, running parallel with the A3 and bypassing Ripley. M25 clockwise traffic intending to go to Woking will thus find it worthwhile when the M25 has it's usual morning and evening queues from Cobham Services to leave at junction 10 and take the new route to Burnt Common without any fear of hold-ups in Ripley. That traffic will however have to travel along Send Barns Lane and Send Road, already gridlocked morning and evening, adding even more congestion, noise and pollution. Ripley meanwhile, will bask in relative peace.

Send had the temerity to elect Guildford Greenbelt Group Borough Councillors in 2015. It is impossible to avoid the conclusion that this Plan is punishing the village for doing this. The proposed development, even as it stood prior to the increases provided by the amended Plan and the Inquiry, concentrated 40% of the housing development in an area with 18% of the Borough's population. We are also now intended to take a huge industrial area, the only one of its size in the Plan - all in one rural location. This Plan, taken as a whole as it must be, is utterly disproportionate and unfair to Send, Send Marsh and Burnt Common.

Attached documents:

Comment: MM41 - LPMM18/5891  Respondent: Patrick Oven 11048481  Agent:

Turning now to specific site objections, listed in accordance with the size of the proposals:-

MM41, Garlick's Arch, Send Marsh, Policy A43.

This site has had it's proposed allocation of new houses increased by the Inspector at the Inquiry from 400 to 550. The site is prone to flooding and has for many years been used as a shoot, and thus is contaminated by lead shot. There is a large area of ancient woodland on it, mainly adjacent to Portsmouth Road, which acts as a barrier, both visually and
audibly, to the A3 trunk road running parallel to Portsmouth Road. The site is in the Green Belt, so can only be developed if "exceptional circumstances" can be shown. It also separates Ripley from Send Marsh, providing at present a clear break between the villages. Development of this area would effectively turn Ripley and Send Marsh into one conurbation. Send Marsh is already largely linked to Send itself by development, the only open area being Alderton's Farm, which is also now proposed for development and will be dealt with separately. All three locations would thus become one continuous developed area. The infrastructure in the area is already at full capacity. Given that most of the houses are likely to have two cars each, up to 1000 extra cars will be disgorged onto the local roads. The Burnt Common roundabout already has traffic queuing in all directions at busy times. At 7.15 in the morning the queue from Send Barns Lane to it I can attest can run from the Send crossroads to the roundabout, over a quarter of a mile. The school in Ripley has just closed, and the new one in Send is at full capacity, as is the Medical Centre in send which serves Send, Send Marsh and Ripley and is the only one in those villages. No plans to increase any of this vital infrastructure are included in the Plan.

Attached documents:


GBC has grossly underestimated the effect on the local roads of the proposed developments discussed above and the other developments proposed in the Plan at Clockharn Nurseries, Send Hill and the expansion of the Send Business Centre in Tannery Lane, which are not the subject of amendments and so precluded from discussion here. At the Public Inquiry GBC indicated only a minor increase was anticipated in traffic through Send on the A247 was anticipated. That totally fails to take into account that such huge development has to bring a large increase in both car and HGV traffic, which can only use the existing roads - no new ones are proposed. The proposed 4 way slip roads at the Burnt Common Clandon slip, currently only a northbound exit and a southbound joining will inevitably lead to increased traffic through Send. At present, traffic on the clockwise M25, bound for Woking generally leaves at junction 11. It is possible leave at junction 10 and take the A3 for a mile, leaving and going through Ripley, then Send and Old Woking. However the bottleneck that Ripley presents at busy times morning and evening at present dissuades this. Traffic turning right into the very narrow entrance to Newark Lane, heading for Pyrford and Byfleet, blocks the High Street, causing tailbacks that often stretch back to the A3 junction. GBC has completely failed to take into account that the provision of the 4 way slips at Burnt Common will also serve a new road from the proposed large development at Wisley Airfield, running parallel with the A3 and bypassing Ripley. M25 clockwise traffic intending to go to Woking will thus find it worthwhile when the M25 has it's usual morning and evening queues from Cobham Services to leave at junction 10 and take the new route to Burnt Common without any fear of hold-ups in Ripley. That traffic will however have to travel along Send Barns Lane and Send Road, already gridlocked morning and evening, adding even more congestion, noise and pollution. Ripley meanwhile, will bask in relative peace.

Send had the temerity to elect Guildford Greenbelt Group Borough Councillors in 2015. It is impossible to avoid the conclusion that this Plan is punishing the village for doing this. The proposed development, even as it stood prior to the increases provided by the amended Plan and the Inquiry, concentrated 40% of the housing development in an area with 18% of the Borough's population. We are also now intended to take a huge industrial area, the only one of its size in the Plan - all in one rural location. This Plan, taken as a whole as it must be, is utterly disproportionate and unfair to Send, Send Marsh and Burnt Common.

Attached documents:

Comment: MM42 - LPMM18/5892  Respondent: Patrick Oven 11048481  Agent:
MM42, Burnt Common, London Road Send.

This existing small industrial/warehousing area was included for further development in the first draft of the plan then deleted, with proposed warehousing to go to Garlick's Arch, then reintroduced in the latest iteration of the Plan. It is now proposed that the original 7,000 sq m of additional industrial development should be a MINIMUM of 14,000 sq m. There is no demonstrated need for this industrial allocation, and certainly not at this site. It is the only industrial site proposed in the Plan and is wholly disproportionate for one village to take this amount of development. The Employment Needs Land Allocation 2015 showed an 80% reduction in need for employment floor space. There is a large industrial estate within the Borough, at Slyfield, which has both unused capacity as well as scope for expansion to the east, on poor quality land and avoiding the nature reserve to the south. No attempt has been made to explain why a rural location should take this development, rather than the existing site. The Slyfield site is within half a mile at one end from the A3, to which it could be joined directly by a spur road into it so avoiding the need for HGVs to leave or join the A3 via the A320 and the Stoke junction as at present. This would greatly relieve congestion on the A320, the main Guildford to Woking road. In short, this proposal is utterly ill-founded at the Send location, when an existing industrial site is equally close to the A3 trunk road.

Attached documents:

Comment: MM42 - LPMM18/5898  Respondent: Patrick Oven 11048481  Agent:

MM27, MM41, MM42 and MM48 - Transport Strategy.

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Attached documents:
MM44, Alderton's Farm, Send Marsh.

This was included in the first draft of the Plan then removed. It was reinstated only at the Public Inquiry. As indicated above, it is the only area of undeveloped land between Send Marsh and Send village, and thus effectively provides some green space between the two built-up areas. It is adjacent to Send Marsh Green, which is an extremely attractive location, with several listed cottages as well as the stunning and also listed, Jacobean Manor House. Send Marsh Road is already very busy, as the preferred route between Send and Ripley. As indicated already, proposed housing need has fallen, and given that there is clearly going to be some development at Garlick's Arch, there is no demonstrated need for any houses to be built at this site. Such development will add to traffic on this narrow road, which contains two very sharp bends, and will add to the existing congestion at the traffic lights at Send crossroads.

Attached documents:


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Attached documents:
MM9, The Green Belt.

The amendments to the Plan claim to protect the Green Belt save in the "exceptional circumstances" that can justify development in the Green Belt. However the Council make an exception for in their words "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be within the village". This is effectively allowing development at all the above-discussed sites, all of which are in the Green Belt but to which this test can be subjectively applied, given their proximity to already developed areas. GBC has in any event indicated it intends to remove both Send and Ripley from the Green Belt, thus making Send, Send Marsh and Ripley liable to even further development in due course.

Attached documents:

<table>
<thead>
<tr>
<th>Comment</th>
<th>MM9 - LPMM18/4293</th>
<th>Respondent: Mrs Sue Wright 11049633</th>
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<tbody>
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<td>MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed, would harm openness and become a loophole.</td>
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<tr>
<td>MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation</td>
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<td>MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined</td>
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<td>MM3 There should be a policy(S4)on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate</td>
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Having previously objected to the Local Plan I would also like to record my further objection to the main modifications particularly those that adversely affect Send/ Ripley and the surrounding areas. What I find quite frankly astonishing, is the complete contempt and disregard shown towards the residents of Send and Ripley. The additional properties and the addition of an on/off ramp from the A3 at Burnt Common would have such an adverse effect on the quality of life of existing residents that to completely ignore our views is quite frankly shocking and it will be us that will have to suffer the long-term adverse consequences for years to come.

It is quite frankly astonishing that between the Planning Inspector and Guildford Borough Council, you have both demonstrated a complete disregard for the views from the Send residents who have raised their concerns and have attempted to engage in the process then to be simply ignored is shocking.

How can it be satisfactory that any local authority could contemplate increasing the population of a village by 45% and think that will not have an adverse effect on the quality of life of the existing and new residents that will all have to share the services that were already stretched. Quite frankly the road infrastructure is strained and adding another 700+ homes and related traffic, will just grind the village to a halt, just imagine the level of carbon monoxide and sulphur dioxide the residents of Send will be subjected to.

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to

MM41 Land at Garlicks Arch, Send Marsh, Policy A43
This wasn’t in the first local plan and there’s no reason why Send need this amount of housing so one can only imagine that Send has been selected to accept more than it should due to other parts of the borough not accepting their burden. Why can it be that the following points are being ignored?

• Increased from 400 to 550 homes of which 450 to be built in the first five years
• Increase of 37% in the number of houses proposed in the modifications is excessive.
• That 7000 objections to the previous lower number have been ignored.
• It is Green Belt containing ancient woodland.
• It will join up Send and Ripley and constitute over development
• The site is subject to frequent flooding and contaminated by lead shot
• At least 800 extra cars will block up the adjacent roads
• School and medical facilities will be strained to breaking point

Comment: MM41 - LPMM18/4198  Respondent: Belinda Nicoll 11049729  Agent: 

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to

Comment: MM42 - LPMM18/4194  Respondent: Belinda Nicoll 11049729  Agent: 

MM42 Land at Burnt Common, London Road, Send, Policy A58
• Increased from 7000 sq m to a minimum of 14,800 sq m of industrial and storage
• Since being deleted from the 2014 plan this has been increased twice, doubling the area.
• It is by far the largest new industrial allocation in any village in the borough
• There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
• The Employment Land Needs Assessment showed a reduction in demand for industrial land.
• This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous.

Comment: MM42 - LPMM18/4199  Respondent: Belinda Nicoll 11049729  Agent: 

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.
This wasn’t in the first local plan and there’s no reason why Send need this amount of housing so one can only imagine that Send has been selected to accept more than it should due to other parts of the borough not accepting their burden. Why can it be that the following points are being ignored?

- New site for 120 Homes including some self-build
- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads.
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Comment: MM48 - LPMM18/4200  Respondent: Belinda Nicoll 11049729  Agent:

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Comment: MM9 - LPMM18/4201  Respondent: Belinda Nicoll 11049729  Agent:

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Comment: MM2 - LPMM18/4637  Respondent: Roger Bean 11051713  Agent:

Waste/recycling - slyfield can not handle existing demand, council can not hit targets and fails repeatedly on borough recycling, fly tipping also on the increase. Another prime example as to the lack of vision and planning and cost cutting and the complete inability to manage the boroughs needs for effective waste management. This will only increase due to housing plans.
The village cannot cope with the huge number of proposed houses and industrial units, it will change and destroy the village environment, it is a village!

Attached documents:

Comment: MM27 - LPMM18/4628  Respondent: Roger Bean 11051713  Agent:

MM27 MM41 MM42 MM48

the traffic implications on the village are huge, it would not be able to cope with thousands more cars everyday. The roads would be gridlocked, there would be increased noise and air pollution. Council and highways cannot cope with current traffic and wear and tear on roads, potholes, broken kerbs, street lights not working.

Attached documents:

Comment: MM41 - LPMM18/4625  Respondent: Roger Bean 11051713  Agent:

MM41 Garlicks Arch

I object to this because:
The number of houses is excessive and previous objections have been ignored with a lower number of houses.
The area is in the green belt and is an area of ancient woodland, it is protected and can not be violated as the green belt is protected.
The number of extra cars from the houses will be huge, using already congested roads around the area.

With weekly problems on main travel routes M25 and A3 these roads cannot even cope with existing traffic. With traffic delays cars work inefficiently and pollutants are increased. Does the council want to be responsible for shortening the life of residents. Years of lack of investment in local schools, health infrastructure and a general lack of vision by the local council is why we have these issues. This needs to be addressed prior to any consideration for home building.

One of the local primary schools which the children living in the new houses would have gone to has been CLOSED. Where will they go to school as there will now not be enough school places. The schools are already over subscribed. Send first school was rebuilt bigger to absorb St Bedes and its full already. Prime example as to lack of vision and planning failures.
The medical centre is already unable to cope with existing patients. When ringing for appointments we are already told to go to the walk in centre as they can't help. This is unacceptable and will be made worse.

Attached documents:

Comment: MM41 - LPMM18/4629  Respondent: Roger Bean 11051713  Agent:

MM27 MM41 MM42 MM48

the traffic implications on the village are huge, it would not be able to cope with thousands more cars everyday. The
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Attached documents:

**Comment:** MM42 - LPMM18/4626  **Respondent:** Roger Bean 11051713  **Agent:**

MM42 Burnt Common

I object to this because:
there is no need for more industrial space when existing areas of this are unused.
the surrounding roads will not be able to cope with the increased traffic.

Most local industrial units have closed and converted to residential due to a lack of demand and support from local council for startups enterprises. Businesses have moved away, companies relocated to boroughs with incentives hence why we have industrial units to let locally, why do we need more?

Attached documents:

**Comment:** MM42 - LPMM18/4636  **Respondent:** Roger Bean 11051713  **Agent:**

MM27 MM41 MM42 MM48

the traffic implications on the village are huge, it would not be able to cope with thousands more cars everyday. The roads would be gridlocked, there would be increased noise and air pollution. Council and highways can not cope with current traffic and wear and tear on roads, potholes, broken kerbs, street lights not working.

Attached documents:

**Comment:** MM44 - LPMM18/4627  **Respondent:** Roger Bean 11051713  **Agent:**

MM44 Alderton's Farm

I object to this because:
it is greenbelt land how can this even be considered I can only assume that [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

this has already been deleted from a previous draft and now put back in.
these houses are unnecessary as there are hundreds of other proposed houses in the area, far too many for the village to cope with.
the narrow roads in the area will not be able to cope with the huge amount of increased traffic. Pollution levels will increase leading to shortened lifespans and more pressure on local services. Which following council cuts due to inefficiencies and top earning in upper tier management will not have the money to spend on infrastructure and services required to support this increase in local population.
Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247
I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for
traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that
Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site
behind the station.

4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without
mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this
requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the
argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much
more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the
town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound
basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes
table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic
growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the
Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student
homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is
more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not
been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a)
is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of **green approaches** should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

**Comment:** MM23 - LPMM18/2978  **Respondent:** Claire Owen 11053825  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

**Comment:** MM3 - LPMM18/2969  **Respondent:** Claire Owen 11053825  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/2972  Respondent: Claire Owen 11053825  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2973  Respondent: Claire Owen 11053825  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2974  Respondent: Claire Owen 11053825  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2975  Respondent: Claire Owen 11053825  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2976  Respondent: Claire Owen 11053825  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2977  Respondent: Claire Owen 11053825  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2970  Respondent: Claire Owen 11053825  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM45 - LPMM18/1904  Respondent: Mr Martin Bramley 11055489  Agent:

Please see file attachment "GBC Local Plan submission 22-10-18"

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There would appear to be statements within the Local Plan relating to the inclusion of Site A64 as a “Village Extension” creating 105 houses built over a 3-year period, which are somewhat tenuous to say the least:

1. The proposed site is in Green Belt land and, if approved, becomes the first incursion into the Green Belt by crossing the natural barrier of the railway line separating Flexford from Normandy thereby making Normandy susceptible to major urbanisation. Yet the plan states that it wishes to protect the Green Belt and will only encroach into the Green Belt under exceptional circumstances. No attempt has been made to explain the exceptional circumstances that relate to Site A64.
2. The proposed site was not included in the original local plan, that part of Normandy being rated as “red” for sensitivity. Evidently the current submission no longer regards the area as sensitive, a volte-face on the part of the Council without any explanation given.

3. The Local Plan acknowledges that Site A64 is the smallest and most rural of all the sites proposed. At the same time, the Local Plan refers to the now agreed development of Ash and Tongham but without going into greater detail. This scheduled development is imminent and not more than 3 miles west of the proposed Site A64; it is also a major housing development covering 96 hectares of land. In addition planning has agreed to the construction of a new road bridge on the A323 spanning the railway line between Aldershot and Guildford at Ash Station so as to remove the current bottleneck for vehicles travelling between Aldershot & Guildford. Site A64 is located on Glaziers Lane which exits via a cross road onto the A323; today exiting onto the A323 is dangerous and extremely difficult during the morning and evening peak periods. The Ash/Tongham development will add considerably to the current congestion: 105 new houses in Glaziers Lane will add further to this congestion irrespective of the near proximity of Wanborough Station and the proposed additional station serving the Royal Surrey Hospital and the Surrey Research park. There is no justification for building a further 105 new houses on Green Belt land in the short term and probably not even in the longer term if the latest ONS housing projections are taken into account.

Finally I cannot find anywhere within the Local Plan mention of the impact of Site 64 on local infrastructure. The proposal to build 105 new houses represents a 7% increase in the number of houses in Normandy & Flexford and is considered to be a “Main Modification” yet there is no impact assessment on doctors’ surgeries, schools, supply of utilities, sewage, drainage – there is already a large lake within the curtilage of the proposed site – shops (there are no local shops) and finally road traffic. This part of the Local Plan gives the impression of being cobbled together purely to respond to the Inspector’s challenge to the original Local Plan.

Attached documents:  GBC Local Plan submission 22-10-18.docx  (126 KB)

Comment: MM2 - LPMM18/5994  Respondent: Peter Komisarczuk 11061185  Agent: 

I am writing to record my huge dismay and I wish to object in the strongest terms to the following changes to the Local Plan. Send appears to be the most heavily affected area in all the entire local plan but has new requirements put on it by the latest changes referred to as the Main Modifications about which I understand are the only changes I can comment on.

[...]

Other developments

and the other developments planned, ClockBarn – 60 houses, SendHill travellers site and 40 houses, Send Business Centre, which is to be increased by 25% despite it being in a conservation area. Thee changes are huge for any town, to do this to a rural area on the edge of the green belt is totally unacceptable. If this was to be completed as Guildford Council have not dealt with any changes to local roads, schools, or health services should be shared around the entire council area, not all heaped in a single place, which is just foolish.

Attached documents:

Comment: MM27 - LPMM18/6003  Respondent: Peter Komisarczuk 11061185  Agent: 

MM27, MM41, MM42, transport strategy
Burnt Common, Send, Ripley, will all be unduly affected by the road changes at Garlick’s Arch, ClockBarn, SendHill, Send Business Centre, and nearby Gosden Hill, the changes which are frequently on/off at Wisley/Ockham have not been addressed by the plan, beyond the use of the A3 with its proposed changes and the Clandon slip roads. No survey has been done on the current flows of traffic, no proper assessment has been completed at all of the aggregate traffic increases and impact on Burnt Common Lane, Send Barns Lane and Send Road. The constant gridlock at heavy use times – morning and evening - and the increase in pollution especially Nitrogen Dioxide which is already bordering on dangerous levels. There will be many thousands of extra cars travelling through the area, increasing the already loud noise from the A3.

Attached documents:

Comment: MM41 - LPMM18/6000  Respondent: Peter Komisarczuk 11061185  Agent:

MM41 Land at Garlick’s Arch, Send Marsh, Policy A43

This land is currently farm land and has an area of ancient woodland, it is also within the greenbelt and therefore should never be built on. Especially as no evidence of exceptional need has been demonstrated.

The modification allows for 550 houses of which 450 must be built within the next five years. I understand that 7000 objections were raised about this in the previous consultation, all this work by 7000 people who live in and around the village has been ignored and we the people who live here count for nothing.

The site is constantly flooding in wet weather, and flood water even managed to get into the Gas main a few years back which caused many to be without gas for days in the winter. I understand that Lead sot is also a large issue on this area, although as I am wheelchair bound I have not proved this for myself.

The building on the site known as Garlic Arch will join Send to Ripley, as well as obliterating the hamlet of Burnt Common, which has its own identity, which has been under attack from local authority for many years. Tis joining of two villages and one hamlet can only be viewed as overdevelopment and therefore should not be allowed.

The building of all these extra houses in an area already struggling with not enough school places for the existing population plus no facilities for the local Doctors, Hospitals, Dentists etc.

MM27, MM41, MM42, transport strategy

Burnt Common, Send, Ripley, will all be unduly affected by the road changes at Garlick’s Arch, ClockBarn, SendHill, Send Business Centre, and nearby Gosden Hill, the changes which are frequently on/off at Wisley/Ockham have not been addressed by the plan, beyond the use of the A3 with its proposed changes and the Clandon slip roads. No survey has been done on the current flows of traffic, no proper assessment has been completed at all of the aggregate traffic increases and impact on Burnt Common Lane, Send Barns Lane and Send Road. The constant gridlock at heavy use times – morning and evening - and the increase in pollution especially Nitrogen Dioxide which is already bordering on dangerous levels. There will be many thousands of extra cars travelling through the area, increasing the already loud noise from the A3.

Attached documents:

Comment: MM42 - LPMM18/6001  Respondent: Peter Komisarczuk 11061185  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58
This land was originally removed from the 2014 plan, since removal it has been re-added twice firstly to 700 sq m but now to a minimum of 14,800 sq m.

This land is also Green Belt and no exceptional circumstances have been offered for the use of this land in this way, which contradicts the policy MM9.

There is no need for industrial sites within Green Belt land, especially as Slyfield Estate has plenty of unused but available, it seems to be rather strange to claim a need for extra new industrial space on a site that requires it to show a need for exceptional circumstances as it is currently in the green Belt and should be left.

The employment land needs assessment shows a reduction in demand for industrial sites, so why the need for this site. I see that this change is on top of the 25% increase in the Send business centre. The London road the A3 prior to the Ripley Bypass, is a two lane road, all other roads are small narrow lanes, how can large/heavy trucks travel here on country lanes? Nitrogen dioxide levels in this area are already dangerous to health.

Attached documents:

Comment: MM9 - LPMM18/6004 Respondent: Peter Komisarczuk 11061185 Agent: MM9 Green Belt

Guildford used some nice words and rephrasing, to enable them to claim all this building is necessary on Green Belt land. In nobody’s mind can the infiltration of the Green Belt here in the Send, Burnt Common area be seen as limited infilling. Introducing a subjective test is wrong and negates the Green Belt protection.

Attached documents:

Comment: MM42 - LPMM18/3782 Respondent: Ewbank's Auctioneers 11061345 Agent: DMH Stallard (Ms Katie Lamb)

Guildford Local Plan Main Modifications Consultation On behalf of Ewbank's Auctioneers LLP Main Modification 42 and Policy A58

DMH Stallard act on behalf of Ewbank’s Auctioneers LLP (“Ewbank’s”) in relation to the Guildford Local Plan Main Modifications Consultation and land at Ewbank’s, London Road, Send.

Ewbank’s have been represented throughout the Local Plan process, including participation in the Local Plan Examination, these representations should be read alongside previous submissions.

Ewbank’s are an existing local employer with a warehouse and auction room at London Road, Send. Ewbank’s are highly successful, having significantly grown since 1992 when they acquired their current premises, however, there is a pressing need to expand or find alternative suitable premises; however, like most other commercial sites, it is restricted by its Green Belt location. The site, which is defined as a previously developed site, is located to the south of Send Marsh, accessed via London Road but adjacent to the A3. It is located within the Green Belt but is well contained by significant treed boundaries; there are some views into the site from the A3, but these are limited and dominated by the existing warehouse. The land was previously used as a plant nursery and much of the site is characterised by scrub land, parking and overgrown hardstanding / hardcore. The site is directly south of land allocated under policy A58, amended through Main Modification (MM) 42. It was previously included in the initial Regulation 19 Pre-Submission Local Plan as a wider site allocation (Policy 13 – see plan and policy attached).
The Council are currently consulting on a range of Main Modifications to the Local Plan, which acknowledges a need for additional employment floorspace in response to issues raised at the Local Plan Examination. Ewbank’s representations, contained within this letter are confined to MM42 – Policy A58 – Land around Burnt Common warehouse, London Road, Send.

The NPPF requires Local Plans to be tested against tests of ‘soundness’, in particular these tests require that Local Plans meet an areas objectively assessed needs, as a minimum. We submit that MM42 and Policy A58 fails to provide for the objectively assessed employment needs of the Borough, as identified through the Council’s own evidence base and as discussed at the Local Plan Examination.

During the Local Plan Examination, the Council submitted evidence (GBC-LPSS-015) stating that the industrial land requirements were between 16,650sqm and 18,450sqm, this supports the previous submissions made on behalf of Ewbank’s (and others) prior to, and during, the Local Plan Examination. This evidence goes into further detail taking into account losses and site allocations, however, in its conclusion it fails to set out the industrial floorspace requirements; based on the figures provided within the document, it can be calculated that there is a need for an additional 12,913sqm – 14,713sqm of industrial floor space (revised needs taking account of gains, plus local plan allocations). MM42 (policy A58) seeks to allocate a further 7,800sqm of floor space on land already identified around Burnt Common warehouse, this is an increase of more than 110% on just a single site. However, the expansion of provision on land around Burnt Common warehouse still falls significantly short of the remaining need for industrial floorspace (by approximately 5,113sqm - 6,913sqm). The NPPF requires that Local Plans provide for full objectively assessed needs (paragraphs 20 and 35), however, the Local Plan on its own evidence base, does not meet the full objectively assessed employment needs. Our concerns are further compounded by the provision of these needs on a single allocation of land, within single ownership, which is likely to result in artificially slow or no delivery, as was the case with the Local Plan 2003 where only 20% of allocated employment sites were ever released. As such, MM42 and the Local Plan fails to be positively prepared and therefore fails the tests of soundness.

Paragraph 80 of the NPPF requires that planning policies should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Furthermore paragraph 81 requires that planning policies:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

At the heart of the NPPF is the presumption in favour of sustainable development, which requires that policies must help build a strong, responsive and competitive economy in accordance with the above paragraphs. We submit that the Local Plan, through policy A58 and MM42 fails to accord with paragraphs 80 and 81 and the presumption in favour of sustainable development, as it seeks to allocate a site in single ownership for industrial employment use, on land around Burnt Common warehouse (London Road, Send). This allows for no market competition, choice or any flexibility to respond to the needs of a changing market.

MM42 suggests that it is likely that a future assessment of employment need will result in an increase in industrial employment land requirements, suggesting that this could all be delivered on land currently identified in policy A58. However, MM42 already increases the amount of floorspace on the site by over 1100% (from 7,000sqm to 14,800sqm)
and it is therefore questionable whether the site could accommodate additional floorspace to meet future needs as suggested. There is therefore significant concern that MMR42 and policy A58 cannot adapt to the changing needs of the market, as required by the NPPF.

Additionally, by allocating a single site in single ownership, the market is constrained and can be manipulated to ensure high values/rents and it is likely that the landowner or developer will restrict the amount of floorspace coming forwards to maximise financial returns. The NPPG is silent on this matter insofar as it relates to employment land, however, it does acknowledge that housing site allocations must allow for choice and competition in the market (Paragraph: 037 Reference ID: 3-037-20180913) and there it should follow that the same applies to employment land allocations. The NPPF, at paragraph 11, also requires that plans are sufficiently flexible to adapt to rapid change, the allocation of land around Burnt Common warehouse, in single ownership, is unlikely to offer sufficient flexibility as there can be no market competition and no choice for future occupiers, simply put, there will be no choice but to accept the accommodation provided by the landowner.

Land at Ewbank’s was included in earlier iterations of the Local Plan. In 2016, the Council consulted on an initial version of the Regulation 19 Pre-Submission Local Plan. This included land at Ewbank’s as part of Policy 13, which identified land around Burnt Common warehouse (as set out in the submission version Local Plan) and land at Ewbank’s to meet the Borough’s employment needs (see the Council’s Proposals Map, attached). At this stage, the Council must have accepted that a larger site was necessary and acceptable and that this amounted to exceptional circumstances requiring its release from the Green Belt (as such, our representations do not go into detail on the appropriateness of removing the site from the Green Belt).

The land at Ewbank’s and Burnt Common Warehouse formed part of parcel ‘B13’, assessed within the Green Belt and Countryside Study (GBCS). The GBCS concluded that the whole of area B13 provided opportunities to accommodate development without significantly compromising the purposes of the Green Belt and is identified as a Potential Development Area (PDA). Additionally, land around Burnt Common warehouse, including Ewbank’s Auctioneers (referred to as the ‘triangle site’) was assessed as LAA Ref. 152. The GBCS along with the LAA site assessment and pressing need for employment floorspace has been acknowledged as providing the exceptional circumstances required to justify the release of land in relation to policy A58 for development. As the land at Ewbank’s Auctioneers was included in the same site area and assessment, it must follow that there are exceptional circumstances justifying release of land at Ewbank’s not only to meet the objectively assessed employment needs of the Borough, which the Plan currently fails to meet, but will also ensure competition, choice and deliverability. We submit that in order to make the Plan sound, land at Ewbank’s, directly south of the site should be allocated for additional employment floorspace, this could be achieved through further modification to Policy A58 by extending the extent of the allocation as previously identified in earlier iterations of the Local Plan, and as shown on our plan, attached.

Furthermore, it has also come to our attention that the Council have excluded land at Ewbank’s from the latest LAA. The various LAA’s do not include plans of site 152, however the Council have advised that previous iterations of the LAA and its associated assessment in the GBCS (as set out above) incorporated land around Burnt Common warehouse and Ewbank’s, but that the latest LAA revision reduces the site area to just the land around Burnt Common warehouse to follow the current site allocation boundary. Whilst we can appreciate separation of the sites for the purposes of site assessment (the Council are within their rights to assess the sites individually), the Council’s approach to the assessment of land at Ewbank’s is wholly unsound as they have simply removed it from the LAA altogether, notwithstanding the continued promotion of the site through the Local Plan process. The LAA is evidence base, it is required to include all sites promoted to the Council (unless they do not meet the site size threshold), it is not for the Council to exclude sites if they deem them to be unsuitable or should they not allocate those sites. Therefore, if the Council considered it necessary to separate the sites by land ownership, they should have re-assessed both sites individually, instead the Council have retained the site assessment for land around Burnt Common warehouse (site 152) and then excluded land at Ewbank’s from the LAA. The LAA is therefore unsound and fails to give consideration to all sites available to the Council for consideration, it therefore follows that the Local Plan is unsound as it is not based on proportionate evidence. The Council through MM42, have failed to give proper consideration to all available sites, particularly the land at Ewbank’s, which the Council have previously considered suitable for site allocation.

The Sustainability Appraisal (SA) Addendum, submitted with the Main Modifications is also unsound as it fails entirely to give any consideration to the implications of increasing the employment floorspace on a site in single ownership and fails to give any consideration to the alternative solutions, such as the allocation of additional land at Ewbank’s (or other
appropriate sites). MM42 cannot therefore be sound as it is not based in proportionate evidence, fails to consider the alternatives and as we have set out, is not the most appropriate strategy.

It is acknowledged that the original SA highlights the infrastructure requirements resulting from strategic housing and employment growth at Send Marsh. Policy A43a of the Local Plan provides for a new slip road from the A3 to serve this growth. The implementation of this policy will provide a significant improvement to the accessibility of the area, which will include the land at Ewbank’s. As such, the land could be included in the allocation of A58, benefitting from allocated infrastructure improvements, whilst other sites could require additional new infrastructure and highways improvements.

In conclusion, we submit that the Local Plan, through policy A58 and associated main modifications (MM42) fails to meet the tests of soundness. The Plan fails to identify sufficient land to deliver against the objectively assessed employment needs of the Borough. Additionally, through allocating all industrial employment floorspace on a site in single ownership, there is likely to be artificial constraining of the market through purposeful under delivery to ensure maximum financial returns, additionally there will be no choice in the market for future occupiers which can lead to poor standards of design.

In order to make the Plan sound, we submit that at least one additional site allocation should be identified. This would provide for the objectively assessed needs of the Borough, as a minimum, as required by the NPPF, as well as providing market flexibility and competition to ensure a constant and deliverable supply of employment floorspace as well as improved design and choice for future occupier. It would allow for improved delivery across both sites and would ensure there was no artificial constraining of the market. Land at Ewbank’s has been included in previous iterations of the Local Plan in association with land identified through policy A58 (which demonstrates an acceptance of its removal from the Green Belt) and it could be included within Policy A58 and MM42 in order to ensure the soundness of the Plan.

Should the Examination be reopened to deal with any of the issues raised within our submissions, we would wish to participate in the Hearing Sessions.

see attachments for Appendix.

Attached documents:  📌 Ewbank's Attachment 1.pdf (1.4 MB)  
 📌 Ewbank's Attachment 2.pdf (3.7 MB)

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**Comment:** MM2 - LPMM18/1030  **Respondent:** Vicki Groden 11070401  **Agent:**

**MM2 and S2 Planning for the Borough- our spatial development strategy**

- I understand a respected consultancy and the September data from the ONS, which does population forecasts, suggest that appropriate growth in Guildford Borough can be achieved at heavily reduced housing numbers which could mean much reduced requirement at Send. Will Guildford Borough revisit its figures?

Attached documents:

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**Comment:** MM27 - LPMM18/1035  **Respondent:** Vicki Groden 11070401  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

- Has an updated comprehensive assessment been made, taking into account all the sites affecting local traffic - Garlick’s Arch, Burnt Common, Clockbarn, Alderton’s, Wisley and Gosden Hill, with the changes in housing
numbers, to assess the impact on Burnt Common roundabout which will be substantial, and needs assessing at peak hours when most are affected and pollution, congestion and noise will be greatest.

**Attached documents:**

**Comment:** MM41 - LPMM18/1032  **Respondent:** Vicki Groden 11070401  **Agent:**

**MM41 Land at Garlick’s Arch, Send Marsh, Policy A43**

- An increase of 37% in the number of houses proposed is excessive and will create yet more cars on the road and additional pressure on school and medical facilities.
- The site will now become a disproportionate addition to a village of currently 1700 homes.

**Attached documents:**

**Comment:** MM41 - LPMM18/1036  **Respondent:** Vicki Groden 11070401  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

- Has an updated comprehensive assessment been made, taking into account all the sites affecting local traffic - Garlick’s Arch, Burnt Common, Clockbarn, Alderton’s, Wisley and Gosden Hill, with the changes in housing numbers, to assess the impact on Burnt Common roundabout which will be substantial, and needs assessing at peak hours when most are affected and pollution, congestion and noise will be greatest.

**Attached documents:**

**Comment:** MM42 - LPMM18/1033  **Respondent:** Vicki Groden 11070401  **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

- The doubling to the present proposed size creates, I believe, the largest new industrial site, by far, in any village in the borough and is a heavy imposition on this village and this location and its roads.
- I understand Slyfield has unused capacity, therefore it is hard to accept the need for building on Green Belt.
- Does not the Employment Land Needs Assessment show a reduction in demand for industrial land?
- The disturbance of heavy vehicle movement and emissions on the local residents is of great concern

**Attached documents:**

**Comment:** MM44 - LPMM18/1034  **Respondent:** Vicki Groden 11070401  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**
• The reinsertion of this site will increase local traffic even more.

Attached documents:

Comment: MM48 - LPMM18/1037  Respondent: Vicki Groden 11070401  Agent:

**MM27 MM41 MM42 and MM48 Transport Strategy**

- Has an updated comprehensive assessment been made, taking into account all the sites affecting local traffic - Garlick's Arch, Burnt Common, Clockbarn, Alderton's, Wisley and Gosden Hill, with the changes in housing numbers, to assess the impact on Burnt Common roundabout which will be substantial, and needs assessing at peak hours when most are affected and pollution, congestion and noise will be greatest.

Attached documents:

Comment: MM9 - LPMM18/1031  Respondent: Vicki Groden 11070401  Agent:

**MM9 Green Belt Policy**

- The ability to make exceptions for limited infilling outside the identified settlement boundaries undermines confidence in Green Belt Protection and could lead to more development around an already heavily affected village.

Attached documents:

Comment: MM41 - LPMM18/5395  Respondent: Anthony Maine 11070977  Agent:

**OBJECTION – Policies MM41, MM42 and MM44**

I object to the proposed development at these sites as they are all within green belt areas. There are no reasons provided within the Main Modifications to the Local Plan that substantiates development on green belt land.

I urge the council not to consider removing the Green Belt and set in motion future development of these spaces, but to focus on the numerous unused BROWNFIELD sites that exist throughout the Borough. These would more than meet the current housing demand, once this is properly defined within the Local Plan.

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Comment: MM42 - LPMM18/5396  Respondent: Anthony Maine 11070977  Agent:

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I urge the council not to consider removing the Green Belt and set in motion future development of these spaces, but to focus on the numerous unused BROWNFIELD sites that exist throughout the Borough. These would more than meet the current housing demand, once this is properly defined within the Local Plan.

Attached documents:

**Comment:** MM9 - LPMM18/5391  **Respondent:** Anthony Maine 11070977  **Agent:**

I write to register my objection to the planned changes to Send and Send Marsh outlined in the Draft Local Plan.

The retention of the Green Belt is, I feel, the most vital issue in the Local Plan. It must not be slackened to allow expansion, but kept to protect the character and rural distinctiveness of the countryside and to keep villages as just that, villages and not large sprawling towns.

**OBJECTION – Policy MM9**

I object in particular to removing the green belt status from the areas surrounding Send.

The loss of significant swathes of greenbelt land will have a very detrimental impact upon the social, leisure and recreational activities that the local population currently use this land for – football, walks, rambling, dog walking, exercise, usage by young people. In particular young people will have less natural open space and green fields within which to exercise and socialise. At a time when childhood obesity is on the rise, allow the insetting of this land and future development will have a detrimental impact on achieving this objective as vital areas for play and exercise will be lost, impacting upon both child and adult health.

Removing the greenbelt status would jeopardise the habitats of numerous species of wildlife. The open spaces around Send are home to many wildlife species such as bats, badgers, rabbits and many many more, along with wild plants which should all be protected. The council has a duty to protect woodland and the wildlife under the UK BIO Diversity Action Plan.

The NPPF states that new Green Belt boundaries should only be established in exceptional circumstances, for example when planning for larger scale developments such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:
1. demonstrate why normal planning and development management policies would not be adequate;

2. set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;

3. show what the consequences of the proposal would be for sustainable development;

4. demonstrate the necessity for the Green Belt and its consistency with local plans for adjoining areas;

5. and show how the Green Belt would meet the other objectives of the framework.

I question whether the removal of the Green Belt in and around Send has been shown to meet any of the above requirements. There is no evidence presented in the Core Strategy to demonstrate that the proposed strategic extension meets the fundamental aim of Green Belt policy.

The NPPF (para 85, bullet point 6) requires LPAs to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The removal of the Green Belt does not relate to any physical features on the ground and does not fulfil this criterion. The lack of physical features against which the proposed boundary is drawn highlights the inappropriateness of the proposed Green Belt removal and the lack of justification for its insetting.

Whilst I wholeheartedly object to the green belt removal plans, should their inclusion in the Local Plan be forced through, the Council must clearly demonstrated that the new boundaries take account of the need to promote sustainable patterns of development as required by paragraph 84 of the NPPF. The Council must review the boundaries of those settlements which would be covered by the Green Belt to ensure that sites are identified for development to achieve their long term sustainability and clearly define the reason for the insetting, fully detailing the future usage of the inset land.

Importantly if the Council chooses to continue with the alteration, it is essential when submitting the Core Strategy for examination that it is considered 'sound' in that it is justified with the plan being the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence.

Allowing the removal of the Green Belt around Send generally, and thereby facilitating the future development of the sites, will allow the urban sprawl of Guildford and Woking to further encroach on Send. Send is not a suburb of Guildford or Woking and clear separation should be maintained by the retention of the current Green Belt boundary.

Attached documents:

Comment: MM2 - LPMM18/2559  Respondent: Tony Millership 11076161  Agent:

Please see below my comments on the amended GBC Local Plan

1. NUMBER OF HOUSES (MM2) • The current version of the Plan has increased the number of houses from 12,426 (in the previous version) to 12,600 (1.4% increase).

• On 20th September the Office of National Statistics (ONS) released new household growth projections for Guildford for the Plan period of 2015 to 2014 inclusive. The new figures reduced the projected growth in households from 11,142 (that applied to the previous version of the Plan) to 6,635; a reduction of 4,507 households (40.5% reduction).

This change was no surprise; in May 2018 ONS had already released their population projections that clearly foreshadowed a substantial drop in the household projection.

• A reduction of 4,507 dwellings equates to well over two “strategic sites” (ie. the largest sites). The currently planned capacities of the five largest sites are:
At his examination of the previous version of the Local Plan in June/July this year, the Planning Inspector required the profile of house building to be biased towards the early part of the plan period in order to improve the affordability of housing in Guildford borough. In response the Council added a further five sites totalling 655 new dwellings:

- Garlick’s Arch, Send Marsh (Site A43, MM41) 550 (including the 150 listed below)
  - At his examination of the previous version of the Local Plan in June/July this year, the Planning Inspector required the profile of house building to be biased towards the early part of the plan period in order to improve the affordability of housing in Guildford borough. In response the Council added a further five sites totalling 655 new dwellings:
- Garlick’s Arch, Send Marsh (Site A43, MM41) 150
- Aaron’s Hill, Godalming (Site A61, MM??) 200
- Hornhatch Farm, Chilworth (Site A62, MM??) 80
- Alderton’s Farm, Send Marsh (Site A63, MM??) 120
- Strawberry Farm, Flexford (Site A64, MM??) 105

This increase in the planned number of houses was introduced at a time when a clear signal of the 40% drop in projected households was already apparent (ie. the ONS population projection of May 2018).

2. RE-OPENING THE PUBLIC EXAMINATION (MM2)

- There are very large discrepancies between the Plan and the up-to-date ONS household data.
- The Public Examination of the Plan by the Planning Inspector must be re-opened.

Attached documents:

Comment: MM3 - LPMM18/2560  
Respondent: Tony Millership 11076161  
Agent:

3. NEW POLICY S3 ON THE TOWN CENTRE (MM3)

- The version of the Local Plan being consulted on now finally (after a process that has now taken more than five years) includes a new policy on the town centre (Policy S3).
- The town centre is universally acknowledged (including by the Council) to be the largest and most sustainable location in the borough, but as currently drafted Policy S3 is wordy, general and imprecise, and fails to specify concrete in terms of what is planned for the town, whereabouts it is planned, or when it is proposed that it should happen.
- A town centre policy is necessary, but the current draft falls well short of the requirement.

Attached documents:
5. POLICY A35: FORMER WISLEY AIRFIELD (MM40)

- On 13th June 2018 the Secretary of State published his decision to uphold the Councils’ decision to refuse permission for the Wisley Airfield planning application (15/P/00012), and the applicant’s planning appeal was dismissed.

- Three months later the Local Plan (including Policy A35 for a development of essentially the same scale on Wisley Airfield as that rejected by the Secretary of State) was submitted for the present public and fails to specify concrete in terms of what is planned for the town, whereabouts it is planned, or when it is proposed that it should happen.

- Three months later the Local Plan (including Policy A35 for a development of essentially the same scale on Wisley Airfield as that rejected by the Secretary of State) was submitted for the present public consultation.

- This seems very odd at a time when the official household projections on which the Local Plan was based had been reduced by 40% (see point 1 above).

- The Site of Nature Conservation Importance (SNCI) which used to cover the entire site has been reduced to about 15-20% of its former size, and about one third of that residual area is land that is “safeguarded” for waste operations (as in the Surrey Waste Plan). However, the Local Plan states that “Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.”

Attached documents:

Comment: MM9 - LPMM18/2561  Respondent: Tony Millership 11076161  Agent:

4. POLICY P2: GREEN BELT (MM9)

- This Policy has been almost completely redrafted, but takes no account of the large reduction in projected households (see paragraph 1 above).

- 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt.

- The Local Plan states that “more housing is likely to come forward over the plan period” (“Reasoned Justification”, paragraph 4.1.21).

- Given the reduced housing projections from ONS, and the apparent likelihood of as yet unknown additional housing during the period of the Plan, the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist, especially when
  - 66% of the development is proposed on land that is currently in the Green Belt.
  - The new Policy S3 on the town centre (the largest and most sustainable location in the borough) is weak, wordy and unacceptable.

Attached documents:

Comment: MM41 - LPMM18/4996  Respondent: David Williamson 11077025  Agent:
MM41 Land at Garlick’s Arch, Send Marsh, Policy A43:

I object to the Policy A43 change for the following reasons:

- No ‘exceptional circumstances’ exist to justify this use of Green Belt land
- The number of houses proposed has actually been increased, ignoring the thousands of previous objections already made by local residents
- The site is ancient woodland from the time of Queen Elizabeth 1 and cannot be replaced
- The development would effectively join up the villages of Send and Ripley, defeating the very purpose of Green Belt land
- It is currently a Zone 2 Flood area and development will make matters considerably worse
- It will generate massive amounts of additional traffic that the local road network simply cannot cope with

Attached documents:

Comment: MM42 - LPMM18/4997  Respondent: David Williamson 11077025  Agent:

MM42 Land at Burnt Common, London Road, Policy A58:

I object to the Policy A58 change for the following reasons:

- It was deleted from the 2014 draft as a direct result of the huge number of objections made previously
- The parameters of allocation of land for industrial or warehousing use has increased twice, doubling the proposed area
- Slyfield and Guildford still have empty sites and units. There is no need for this development in the middle of Green Belt land
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole borough. An allocation of 10+ hectares just at Send in Green Belt land is utterly unnecessary
- The increase in heavy traffic would cause gridlock on local roads, and an increase in air pollution and danger to local residents and children

Attached documents:

Comment: MM44 - LPMM18/4998  Respondent: David Williamson 11077025  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63:

I object to the reinstatement of Policy A63 for the following reasons:

- It was deleted from an earlier draft as a direct result of the huge number of objections made previously
- No ‘exceptional circumstances’ exist to justify this use of Green Belt land

- In conjunction with Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) this makes a total of 770 proposed new houses. Set against the existing 1700 houses in Send, this represents a staggering 45% increase. The village’s infrastructure simply cannot cope with this scale of development.

- The proposals for Send are wholly disproportionate compared to other areas in the borough.

Green Belt, Policy 2, paragraph 4.3.15:

- The council’s assertion that exceptional circumstances allow for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village” introduces a subjective test, and effectively attempts to directly negate Green Belt Policy.

To summarise, all these developments in Green Belt land have attracted many thousands of objections from local residents - they are not wanted, but more importantly, they are simply not needed. There are many brown field sites throughout the borough that have not been taken advantage of, only because they would not yield as good a profit for developers.

Housing is needed, but it must be built in the right places, not just the most convenient or most profitable, and be accompanied with investment in local services for the huge increase in numbers of people that would come along with the proposed construction. The real tragedy is that were these developments in Send, Send Marsh and Burnt Common allowed to go ahead, the quality of life for existing and new residents alike would be much poorer than it is now. Local roads, schools and medical facilities are already fully stretched. There would be a considerable human cost for simply attempting to hit government targets.

Attached documents:

Comment: MM13 - LPMM18/3572  Respondent: Sue Carmichael 11086529  Agent:

MM13: the challenge to physical retailing from online shopping has not been adequately considered, which means there is too much allocation for retail in the town centre that could be better used to provide sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/3567  Respondent: Sue Carmichael 11086529  Agent:

Regarding the consultation on the Main Modifications to the proposed Local Plan:

1. The examination in public should be reopened because of the major discrepancy between the Plan and the latest ONS projections of household numbers.

2. I support the representation made by Wisley Action Group regarding Site A35 as the requirement is not necessary given the revised ONS household projections.

Household projections

In September 2018 the Office of National Statistics (ONS) released new household growth projections for Guildford for the Plan period of 2015-34. The new figures reduced the projected growth in households by 40% - a reduction of 4,500
households. This reduction removes the need for at least two “strategic sites” (the five largest sites represent 7,650 dwellings including 2,000 at Wisley Airfield and 550 at Garlick’s Arch). Given these reduced household projections, Guildford should have no requirement to take Woking’s unmet housing need (which virtually disappears under the new ONS projections); the is particularly important as it will require further release of green belt.

The latest ONS projections should be used the basis for the Local Plan otherwise it will be unsound

Other comments on the Plan

MM2: The addition of another 500 houses in Send (which will be heavily car dependent) will have a severe impact on access through Ripley which has not been properly considered.

Attached documents:

<table>
<thead>
<tr>
<th>Comment: MM40 - LPMM18/3568</th>
<th>Respondent: Sue Carmichael 11086529</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Site A35.</td>
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<tr>
<td>• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the air traffic control beacon.</td>
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Attached documents:

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/3571</th>
<th>Respondent: Sue Carmichael 11086529</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>MM41: transport strategy relies on inadequate modelling and including the delay in Junction 10 Highways England RIS of at least two years will impact the developments that rely on this scheme (e.g. A35 Wisley Airfield, A43 Garlick’s Arch and A63 Alderton’s Farm)</td>
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<thead>
<tr>
<th>Comment: MM50 - LPMM18/3569</th>
<th>Respondent: Sue Carmichael 11086529</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM47: the size of the SNCI is significantly reduced despite the whole site qualifying on ecological grounds; there is no justification for altering the SNCI boundary.</td>
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</tbody>
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Attached documents:

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<thead>
<tr>
<th>Comment: MM45 - LPMM18/4823</th>
<th>Respondent: Garry Scheide 11089377</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Re Normandy proposal Main Modification 45 policy A64.</td>
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</tbody>
</table>
I have many concerns some of which are the local infrastructure is unable to cope with the current traffic ,these include numerous Heavy goods vehicles passing the proposed site on a daily basis to local businesses .The planned access is also close to a small road bridge with width and visibility restrictions and would be a major safety concern .Glaziers lane is a notorious (rat run) during the day .I am aware there are numerous other considerations why this site is not suitable and I'm surprised that this late addition to the Guildford local plan is even being considered .Please ensure that my objections are registered .

Attached documents:

Comment: MM41 - LPMM18/3343  Respondent: Neil Munro 11097409  Agent:

RE: Objection to Local plan

I am writing to object to the over development of Send village in the proposed Local plan.

My family have lived in Send for over 50 years. We, along with all residents of Send and the surrounding villages, will be negatively affected by the impacts of the development on the green space, transport system and the health and education provision.

The following specific objections relate to the following proposed developments

MM41 Garlicks Arch 550 homes

MM42 Burnt Common industrial and storage

MM44 Aldertons Farm 120 homes

1. The current proposed number of new homes is across all schemes is 770 compared the current number of 1700 homes in Send. This is a 45 % increase and will massively change the nature and way of life in Send beyond all recognition and it will lose its village feel. In addition the developments that are being proposed will join Send to Send Marsh and Send Marsh to Ripley resulting in one large village removing the individual character.

2. The introduction of 770 new homes will result in an addition of up to 1500 cars on the roads of Send and Ripley. There are currently major delays and traffic queues through Send, Ripley and at all junctions at both morning and evening peak times which can extend throughout the day as soon as any road works are introduced in the local area. The addition of 1500 cars will cause the local roads to gridlock and increase the risk of accidents. This in turn will reduce the numbers of cyclists and pedestrians due to the pollution and increased risks of accidents.

The proposed Industrial and storage provision at Burnt Common will necessitate a large number of HGV vehicles passing through Send and Ripley. Even if there are proposed new roads and junctions to aid in this, without legal controls in place, companies will use the smaller roads as direct routes. In the event of problems on the main road network lorries would be diverted via the smaller roads -this is becoming and more and more frequent problem as the main road networks are becoming overwhelmed.

3. The Villages Medical centre already covers the villages of Send, Ripley , Clandon and surrounding areas and it can already take over 6 days to get an appointment to see a doctor. An increase number in excess of 2000 patients would make it impossible to get an appointment and would result is people being unable to see a doctor or having to present themselves at A&E as the only way to achieve a healthcare provision. This is totally unacceptable and would put people’s health and lives at risk.

4. The nearest secondary school is becoming increasingly oversubscribed from Guildford residents, leaving a reduced number of places for residents of Send. This is leading to a situation in a couple of year’s time when there will be no places allocated to children in Send. Provision of good quality school places to meet the current population requirements
has been promised for years and is yet to be delivered. The planned increase in population will only add to this. The proposed number would require a new school to be built and established prior to any development to ensure provision was in place.

5. The necessary construction and infrastructure traffic required to construct these developments will have and major and lasting effect on the village, roads, trees and surroundings with pollution and damage to the roads. I work in Construction logistics and know fully the extent of the problems that will occur and how unless fully controlled, promises on measures to avoid impact during construction will be ignored once construction starts.

Although the proposed development in Send Hill is not included in the amendments, as residents of Orchard Way we would be negatively affected by the proposed development as follows.

• The proposed number of houses on the site is inappropriate for the size of the site.

• The increased traffic from the dwellings will overwhelm the road and the associated Junctions with impact on risk of accidents and delays

• The construction traffic to build the dwellings will cause major disruption and permanent damage to the road and environment including damage to trees and hedges from the large delivery vehicles.

• There are already major problems with the main sewer drainage from properties in Orchard Way and Send Hills which will be compounded by the introduction of 40 new dwellings.

• The area identified is Green Belt and this must be maintained for future generations.

• The number of dwellings proposed would not allow space for sufficient and realistic parking allocations for a rural housing location leading to parking in Send Hill which is already a problem and further adds to delays in traffic and accident risks.

• The inclusion of Traveller pitches will have a detrimental effect on the areas for the following reasons.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. Where even a small number of pitch allocations have been provided it often leads to unofficial sites being set up locally and further Travellers visit / locate to the area in an attempt to grow the provision and their community.

In these instances it has been seen that councils are either unwilling or unable to take enforcement action leaving it to residents groups to take action to resolve the issues.

The Send Hill cannot accommodate the transport of mobiles homes.

As with all proposals within the local plan they are based on providing the best option to housing developers by providing the largest number of dwellings in one block to maximise the opportunity for their profit.

The focus and responsibility of the council must be to meet the housing need in the most sympathetic and sustainable way and ensuring the villages are not lost under new towns and all character is lost. The local plan needs to be re-drafted under these terms and opportunity for small development identified that will fit within the villages and where the village can influence the development rather than the development have a major detrimental effect on the village.

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• The increased traffic from the dwellings will overwhelm the road and the associated Junctions with impact on risk of accidents and delays
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[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. Where even a small number of pitch allocations have been provided it often leads to unofficial sites being set up locally and further travellers visit / locate to the area in an attempt to grow the provision and their community.

The Send Hill cannot accommodate the transport of mobile homes.

As with all proposals within the local plan they are based on providing the best option to housing developers by providing the largest number of dwellings in one block to maximise the opportunity for their profit.

The focus and responsibility of the council must be to meet the housing need in the most sympathetic and sustainable way and ensuring the villages are not lost under new towns and all character is lost. The local plan needs to be re-drafted under these terms and opportunity for small development identified that will fit within the villages and where the village can influence the development rather than the development have a major detrimental effect on the village.

Attached documents:

Comment: MM44 - LPMM18/3345 Respondent: Neil Munro 11097409 Agent:

RE: Objection to Local plan

I am writing to object to the over development of Send village in the proposed Local plan.

My family have lived in Send for over 50 years. We, along with all residents of Send and the surrounding villages, will be negatively affected by the impacts of the development on the green space, transport system and the health and education provision.

The following specific objections relate to the following proposed developments

MM41 Garlicks Arch 550 homes

MM42 Burnt Common industrial and storage

MM44 Aldertons Farm 120 homes

1. The current proposed number of new homes is across all schemes is 770 compared the current number of 1700 homes in Send. This is a 45 % increase and will massively change the nature and way of life in Send beyond all recognition and
it will lose its village feel. In addition the developments that are being proposed will join Send to Send Marsh and Send Marsh to Ripley resulting in one large village removing the individual character.

2. The introduction of 770 new homes will result in an addition of up to 1500 cars on the roads of Send and Ripley. There are currently major delays and traffic queues through Send, Ripley and at all junctions at both morning and evening peak times which can extend throughout the day as soon as any road works are introduced in the local area. The addition of 1500 cars will cause the local roads to gridlock and increase the risk of accidents. This in turn will reduce the numbers of cyclists and pedestrians due to the pollution and increased risks of accidents.

The proposed Industrial and storage provision at Burnt Common will necessitate a large number of HGV vehicles passing through Send and Ripley. Even if there are proposed new roads and junctions to aid in this, without legal controls in place, companies will use the smaller roads as direct routes. In the event of problems on the main road network lorries would be diverted via the smaller roads -this is becoming and more and more frequent problem as the main road networks are becoming overwhelmed.

3. The Villages Medical centre already covers the villages of Send, Ripley, Clandon and surrounding areas and it can already take over 6 days to get an appointment to see a doctor. An increase number in excess of 2000 patients would make it impossible to get an appointment and would result is people being unable to see a doctor or having to present themselves at A&E as the only way to achieve a healthcare provision. This is totally unacceptable and would put people’s health and lives at risk.

4. The nearest secondary school is becoming increasingly oversubscribed from Guildford residents, leaving a reduced number of places for residents of Send. This is leading to a situation in a couple of year’s time when there will be no places allocated to children in Send. Provision of good quality school places to meet the current population requirements has been promised for years and is yet to be delivered. The planned increase in population will only add to this. The proposed number would require a new school to be built and established prior to any development to ensure provision was in place.

5. The necessary construction and infrastructure traffic required to construct these developments will have and major and lasting effect on the village, roads, trees and surroundings with pollution and damage to the roads. I work in Construction logistics and know fully the extent of the problems that will occur and how unless fully controlled, promises on measures to avoid impact during construction will be ignored once construction starts.

Although the proposed development in Send Hill is not included in the amendments, as residents of Orchard Way we would be negatively affected by the proposed development as follows.

• The proposed number of houses on the site is inappropriate for the size of the site.

• The increased traffic from the dwellings will overwhelm the road and the associated Junctions with impact on risk of accidents and delays

• The construction traffic to build the dwellings will cause major disruption and permanent damage to the road and environment including damage to trees and hedges from the large delivery vehicles.

• There are already major problems with the main sewer drainage from properties in Orchard Way and Send Hills which will be compounded by the introduction of 40 new dwellings.

• The area identified is Green Belt and this must be maintained for future generations.

• The number of dwellings proposed would not allow space for sufficient and realistic parking allocations for a rural housing location leading to parking in Send Hill which is already a problem and further adds to delays in traffic and accident risks.

• The inclusion of Traveller pitches will have a detrimental effect on the areas for the following reasons.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. Where even a small
number of pitch allocations have been provided it often leads to unofficial sites being set up locally and further travellers visit / locate to the area in an attempt to grow the provision and their community.

The Send Hill cannot accommodate the transport of mobiles homes.

As with all proposals within the local plan they are based on providing the best option to housing developers by providing the largest number of dwellings in one block to maximise the opportunity for their profit.

The focus and responsibility of the council must be to meet the housing need in the most sympathetic and sustainable way and ensuring the villages are not lost under new towns and all character is lost. The local plan needs to be re-drafted under these terms and opportunity for small development identified that will fit within the villages and where the village can influence the development rather than the development have a major detrimental effect on the village.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment</th>
<th>MM41 - LPMM18/343</th>
<th>Respondent</th>
<th>Michael Turner 11100193</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLICY A43: LAND AT GARLICK’S ARCH, SEND MARSH/BURNT COMMON AND RIPLEY. MM41</td>
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I object to this increase from 400 to 550 homes, which is without justification. Development on the Green Belt is contrary to Government planning policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. Removing so much green belt land from around Send Marsh is incompatible with the Government’s definition of “sustainable development”. There are no “exceptional circumstances” as required by NPPF paragraphs 79-92 to justify allocating Green Belt land for development. I also object to the loss of Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. This development would also merge the currently separate village settlements of Send and Ripley. This is contrary to the policies for sustainable development in the NPPF which state that “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open” (NPPF paragraph 79).

This development proposal is in an unsustainable location because the site is unsuitable due to lack of access to sustainable transport. It does not benefit from a railway station within easy walking distance and bus services are poor. Residents will have few options but to be reliant on private motor vehicles. There is no adequate assessment of the effect of the traffic generated by the 800+ cars which would accompany this development. These additional vehicles would contribute adversely to the already unacceptably high pollution levels generated by the A3, while the A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The development would also place further pressure on stretched medical and school provision, while many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment</th>
<th>MM42 - LPMM18/344</th>
<th>Respondent</th>
<th>Michael Turner 11100193</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLICY A58: LAND AROUND BURNT COMMON WAREHOUSE, LONDON ROAD, SEND. MM42</td>
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</tbody>
</table>

I object to this proposed increase from 7000 to a minimum of 14,800 sq m of industrial and storage. This is the largest industrial allocation in any village within Guildford borough. Removing so much Green Belt land from around Send Marsh is incompatible with the Government’s definition of “sustainable development”. The proposals are contrary to government policy on sustainable development because there is unused land at Slyfield industrial estate, and there are no “exceptional circumstances” as required by NPPF paragraphs 79-92 to justify allocating Green Belt land for this
development. Furthermore, there is no adequate assessment of the effect of the additional traffic which would be generated by this development, and which would contribute adversely to the already unacceptably high pollution levels generated by the A3.

Attached documents:

**Comment: MM44 - LPMM18/345**  
**Respondent:** Michael Turner 11100193  
**Agent:**

**POLICY A63: LAND WEST OF ALDERTON’S FARM, SEND MARSH ROAD, SEND. MM44I object to this new site for 120 homes within the green belt. Removing so much green belt land from around Send Marsh is incompatible with the Government’s definition of “sustainable development”. There are no “exceptional circumstances” as required by NPPF paragraphs 79-92 to justify allocating Green Belt land for development. There is no adequate assessment of the effect of the additional traffic which would be generated by this development, and the local roads are narrow and inadequate to support the additional traffic which would result.

Attached documents:

**Comment: MM9 - LPMM18/342**  
**Respondent:** Michael Turner 11100193  
**Agent:**

**Objections to the main modifications to the draft Guildford Borough Council Local Plan 2017**

I am writing to object to the following main modifications (MM) following the planning inspector’s report which place additional undue and disproportionate over-development on the village of Send. It is my understanding that as consultation on the local plan is still in progress it will be assessed against the 2012 edition of the government’s National Planning Policy Framework (NPPF) rather than the 2018 revision.

**POLICY P2: GREEN BELT. MM9 2c) “ii. Limited infilling may also be appropriate outside the inset settlement boundaries, as designated on the Policies Map, of the following villages where it can be demonstrated that the site should be considered to be within the village...Send...” I object to this modification, which includes Send, as it has no objective basis, but could be abused to allow any development on any Green Belt land around the village. It is contrary to government planning policies for sustainable development in the NPPF which state that “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open” (NPPF paragraph 79). It would also side-step the test for “exceptional circumstances” required by NPPF paragraphs 79-92 to justify allocating Green Belt land for development.

Attached documents:

**Comment: MM45 - LPMM18/3756**  
**Respondent:** Alastair Lawson 11115361  
**Agent:**

The background of my response is set against awaiting for the official figure of our future housing need to be revised downwards, the potential of having to take on Woking’s unmet housing need and me being unclear why these five sites have been magic’d into the Local Plan at the last minute simply because the Inspector in the EIP wanted more development in the first five years of the plan rather than moving those already mentioned in the proposed plan being bought forward.
In addition those residents of this rural community (around 200) who came to a meeting called by the Normandy Parish Council overwhelmingly (only one lone hand was in favour) clearly felt that this proposal to build 105 houses on Site 64 should be rejected - clear democracy in action.

I object to this for the following reasons:

- **Green Belt**

  This parcel of land is designated Green Belt and therefore should have full protection from development as it fulfils the rules…

  To check the unrestricted sprawl of large built-up areas

  To prevent neighbouring towns from merging into one another

  To assist in safeguarding the countryside from encroachment

  To preserve the setting and special character of historic towns

  To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

  In fact this site is a ‘red-rated’ area of Green Belt.

- **No exceptional circumstances**

  To build in the Green Belt you have to prove there are exceptional circumstances and this seemingly knee-jerk reaction to find some sites to bring forward into the first five years of the Local Plan has not done that.

- **History of Site 64**

  This site has been rejected before - a couple of times - last was for just 9 buildings 17/P/01413 for the following reasons:

  1. The proposal is considered to constitute inappropriate development in the Green Belt and would cause material impact to the openness of the Green Belt. There are no very special circumstances which outweigh the substantial harm to the Green Belt by reason of its inappropriateness and the actual harm to the openness of the Green Belt. The proposal is therefore contrary to the chapter 9 of the NPPF and policies RE2 of the Guildford Borough Local Plan 2003 (as saved by the CLG direction 24/09/07).

  2. The scale and bulk of the proposed dwellings and the resultant spread of development across the undeveloped and open site, with limited screening along the eastern boundary, would have a detrimental impact on the open character of the existing site and would appear as an incongruous feature within the immediate rural setting, leading to the erosion of the rural edge of the built up area of Glaziers Lane. It is therefore considered that the proposal would be contrary to policy G1 and G5 of the saved local plan and paragraph 64 of the NPPF.

  3. The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). The Local Planning Authority is not satisfied that there will be no likely significant effect on the Special Protection Area and, in the absence of an appropriate assessment, is unable to satisfy itself that this proposal, either alone or in combination with other development, would not have an adverse effect on the integrity of the Special Protection Area and the relevant Site of Special Scientific Interest (SSSI). In this respect, significant concerns remain with regard to the adverse effect on the integrity of the Special Protection Area in that there is likely to be an increase in dog walking, general recreational use, damage to the habitat and disturbance to the protected species within the protected areas. As such the development is contrary to the objectives of policies NE1 and NE4 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24/09/07) and conflicts with saved policy NRM6 of the South East Plan 2009. For the same reasons the development would fail to meet the requirements of Regulation 63 of The Conservation of...
Habitats and Species Regulations 2017, as amended, and as the development does not meet the requirements of Regulation 64 the Local Planning Authority must refuse to grant planning permission.

Nothing has changed on this site being inappropriate for development so it cannot be possible to now make it a viable site for inclusion.

- **Ownership of Site 64**

This site is not in single ownership. There is no evidence that the current landowners are keen to sell so this will a huge barrier to getting this site developed within the five years.

- **Composition of the Site 64**

Almost a third of the site is a lake - the options are to leave it and that would result in a squeeze on the resultant space to get 105 houses built - this would be of a density or height that would be out of keeping to the surrounding area.

If filled in - this would take a considerable effort in time and cost that maybe be prohibitive to achieve.

- **Location of Site 64**

Clearly its location near the railway station has made it a ‘sustainable’ option to GBC. However the access would be off a country lane right below a potentially dangerous railway bridge - visibility and sightlines will make this a hazard for residents.

At the north end of the site is Strawberry Farm that is a noisy, smelly and unsightly earth processing operation can’t be good for a new residential area.

The footpath that cuts the site in two leads to the Network Rail un-manned crossing of the line to Guildford - a potential danger that would need serious thought between all parties.

- **Impact of site 64**

The area has a history of flooding and removing the lake that must act as an alleviator would be a serious worry as well as concreting over this field. In the report it states ‘Glaziers Lane at Flexford is associated with a degree of surface water flood risk at its eastern extent’.

It would result in a development that would be at odds with the ribbon form of development within the area. Due to the layout of the proposal it would have suburban appearance and character which would be detriment to the established semi-rural character of the area.

The road is a country lane …Glaziers Lane…not a main arterial road that can cope with an large increase of traffic - estimated based on the house number at over 200 vehicles.

The good primary school is over-subscribed and would have to be extended to cope with what could be a whole new classroom.

There is no evidence that parents would be happy to walk the minimum 30 minute walk to the schools therefore adding more car journeys in the village making it unsustainable.

As there is no mention of secondary education solution one can only assume people will drive to one of the existing like Ash Manor, as regular rail / bus journeys would be expensive in comparison.

Whilst the doctors surgery is mentioned there is no evidence to demonstrate its capacity to cope with the increase in patients.

The site is close to an Area of Great Landscape Value, Surrey Hills Area of Outstanding Natural Beauty and also adjacent
to an SNCI; and there is no evidence that a detailed wildlife assessment has been done to see what the impact would be.

And lastly, by the admission in the GBC proposal, there is no evidence that this site would bring any lasting infrastructure, value or benefit to the community - it appears to be detrimental in the short and long term. So why would anyone who cared about living in this rural setting, who happen to be in vicinity of the ‘growth area’ of Guildford, be for it?

Attached documents:

**Comment:** MM2 - LPMM18/5851  **Respondent:** Miller Developments 11145825  **Agent:** Carter Jonas (Jamie Stanley)

**GUILDFORD BOROUGH COUNCIL MAIN MODIFICATIONS CONSULTATION**

**HOOK FARM AND HUNTS FARM, FAIRLANDS, GUILDFORD**

We write on behalf of our client, Miller Developments, in response to Guildford Borough Council’s (hereafter referred to as the ‘Council’) Schedule of Main Modifications to the Submission Local Plan. Miller Developments is responsible for the promotion of a residential development at Hook Farm and Hunts Farm, Fairlands (Land Availability Assessment Reference: 2072).

Miller Developments has engaged throughout the production of the Local Plan with representations duly made to each stage of consultation, including participation during the Examination in Public. In making representations, Miller Developments has highlighted aspects of unsoundness within the Local Plan.

Whilst the production of Main Modifications is supported in principle, we contend that fundamental flaws remain with the Local Plan as now drafted, unresolved by the matters proposed within the Main Modifications. Accordingly, we believe the Plan remains unsound on the basis the Council continues to:

- Fail to sufficiently plan to meet the full housing needs of the Borough in the early years of the Plan;
- Place an undue reliance on strategic housing allocations which are highly constrained and unlikely to deliver the number of houses required to meet the OAN in a timely fashion;
- Allocate sites which do not accord with the spatial strategy; and
- Fail to identify smaller housing allocations which are less constrained by uncertain infrastructure improvements which are capable of delivering housing within the first five years of the plan period.

In particular, the process undertaken in selecting further site allocations has not been evidence led.

The Council has retrospectively produced a Sustainability Appraisal Addendum (SAA) to justify pre-determined allocations, rather than allowing this work to inform the additional site selection process. The actual assessment work undertaken by the Council evidences that the sites bought forward as additional allocations are less sustainable than alternatives available. Finally, there has been no attempt by the Council to identify what ‘exceptional circumstances’ (2012 NPPF para 83, 2018 NPPF para 136) exist to justify alterations to Green Belt boundaries beyond the delivery of new housing. Each of these points is considered below.

**1 Spatial Development Strategy – MM2**

We support in principle the need for the Council to identify further housing sites to address housing delivery in the first five years of the Plan. Miller Developments has maintained throughout the Local Plan consultation process that the Council had not only failed to adequately plan for sufficient housing against the assessed needs of the HMA, but has also proposed an over-reliance on the delivery of the strategic sites; each of which is the subject of uncertain infrastructure provision.
Despite the steps taken within the Main Modifications to improve this situation, there are still worrying and unnecessary deficiencies within the Plan to meet the housing needs of local people. The question of whether the Liverpool or Sedgefield approach is adopted has a critical impact on housing land supply calculations. Planning practice guidance\(^1\) is clear that the Sedgefield approach should take precedence where possible. This is understandable as seeking to remedy any past undersupply within the first five years of the Plan is consistent with Central Government’s imperative of boosting significantly the supply of housing land, particularly in areas of chronic unaffordability.

Whilst it is appreciated that the use of an alternative method (e.g. the Liverpool Method utilised by the Council) is not prohibited, the emphasis of the guidance makes it clear that any deviation from the Sedgefield method should be the exception, with exceptional circumstances needed to justify such an approach. It is the assertion of Miller Developments that these exceptional circumstances do not exist; rather it is the result of a flawed spatial strategy and site selection process, which has resulted in the need to defer addressing housing need until later in the plan period.

In order for the Local Plan to be justified, the 2012 NPPF (paragraph 182) requires the plan to put forward “the most appropriate strategy, when consider against the reasonable alternatives, based on proportionate evidence”. Given the evidence of the availability and deliverability of sites in the early years of the plan period, the Council cannot uphold that enacting a strategy that fails to adequately address the acute affordability crisis in the Borough, whilst relying on uncertain, speculative highways solutions, is fully justified as the most appropriate strategy.

2 Additional Site Allocations – MM39, MM43, MM44, MM45

Putting aside the continued failure of the Council to identify sufficient sites for delivery within the early years of the Plan, the additional sites proposed within the Main Modifications fail to both accord with the current strategy, whilst representing less sustainable locations than alternative deliverable sites.

As an example, at Hook Farm and Hunts Farm has the potential to accommodate approximately 150 dwellings, care home, substantial green infrastructure, and additional parking and a new access to Worplesdon Primary School, alleviating existing congestion within Fairlands. This development is of a comparable size to those proposed within the Main Modifications; however, represents greater community benefit within a more sustainable location close to the Guildford urban edge. The plans accompanying these representations demonstrate the ability of this development to provide an appropriately proportioned development alongside newly formed, defensible boundaries for the Green Belt.

For clarity, the additional sites favoured by the Council comprise:

- East of Glaziers Lane, Flexford (105 homes)
- Village extensions at:
  - Urban extension at Aarons Hill, Godalming (200 homes)
  - Hornhatch Farm, Chilworth (80 homes)
  - Alderton’s Farm, Send Marsh (120 homes)

The selection process undertaken by the Council for these additional sites is highly contentious and, based on the evidence available to them at the time of making this decision is not founded on the results of the assessment before them.

As is detailed within the Council’s response “\textit{Measures to boost housing delivery in the early years in the context of an OAN figure of 630dpa + contribution to the wider HMA}”\(^2\), the decision to incorporate the above sites followed the Inspector’s note\(^3\) published on 22nd June and was made prior to the hearing session on 3rd July.

The SAA supporting the Main Modifications has since been published retrospectively to justify these decisions rather than used to help inform their allocations as the most appropriate additional sites. It is this process that helps explain the failure of the Council to demonstrate these additional sites represent sustainable development.

This results lead assessment is evident in the manipulation of the site options at each spatial tier. In particular, Tier 8 of the September 2018 SAA covers Green Belt around Guildford or Godalming/Farncombe. This is a deviation from the earlier Sustainability Appraisals (SA), which informed the decision to allocate these sites, which defined Tier 8 sites as Green Belt around Guildford only. This change in approach coincided with the decision to include Aarons Hill, Godalming as an additional allocation. This site was previously assessed as a Tier 10 site.
However, the decision to include Tier 10 sites is not opposed by Miller Developments. In fact, we have emphasised the crucial role sites in these (Tier 10) villages can play in delivering much-needed homes within the early years of the plan period. Where the Council has erred is in the inconsistent and inaccurate approach to both site assessment and site selection.

Our Hearing Statement submitted to the Examination detailed flaws within the 2017 SA. This highlighted that the Council having prioritised three sites that had been assessed as ‘less sensitive’ Green Belt sites along with a further four ‘reasonable site options’ that were within “higher sensitivity” Green Belt locations, deemed appropriate on the basis that these smaller sites that could be delivered in the first five years of the Plan. Three of these four sites now form the additional sites included at MM43-45 despite the Land Availability Assessment document concluding that they were contrary to the spatial strategy.

The SA uses only these as an example of Tier 10 sites capable of acting as a reasonable ‘variable’ from which to assess alternative strategies to the spatial strategy. This paints an inaccurate picture of how this alternative strategy could be implemented. In reality, there are other sites that are more sustainably located to the main urban centre of Guildford that can be provided in conjunction with, or as an alternative to the Council’s additional sites. The allocation of these sites would enable the Council to deliver a greater quantum of housing earlier in the Plan period. It is considered that the narrow assessment taken by the Council fails to give adequate consideration of these alternative options. These shortcomings highlight the failure of the Plan to be positively prepared or for the strategy to be truly justified.

In this context, land immediately to the south of Fairlands (comprising land at Hook Farm and Hunts Farm) has been completely overlooked as a reasonable alternative in the SA and the SAA despite it meeting the tests set out in the SA to a greater degree than any other of the Tier 10 sites.

footnotes
2 GBC-LPSS-020
3 ID/6
4 Land at Winds Ridge, ‘the Horsleys’, and land at Garlick’s Arch
5 Aldertons Farm, Land north east of Flexford, Land south of Halfway House, and Hornhatch Farm

The site lies immediately adjacent to the Fairlands settlement boundary, benefits from good road/public transport access to Guildford town centre and could be delivered in the first five years of the plan period. In addition, this proposal would alleviate a recognised local constraint with an alternative access and additional parking for Worplesdon Primary School. Furthermore, the Council’s Green Belt and Countryside Study Volume III states that Land Parcel H8 (incorporating land Hook Farm/Hunts Farm, which was identified as parcel H8C) provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt. Parcel H8C was considered to be “surrounded by defensible boundaries” and achieved a higher sustainability rating (ranked 5th) when compared with the 41 Potential Development Areas surrounding villages.

The table included at Appendix 1 demonstrates how land south of Fairlands compared to the sites at Aldertons Farm, Flexford, and Hornhatch Farm, as well as alternative sites at Fairlands (H8A&B).

This contrast is reflected within the individual assessment of the sites in the 2017 SA. The table included at Appendix 2, noting that the three Fairlands sites were assessed as a whole and applying a quantitative scoring system to the traffic light assessment undertaken, demonstrates Fairlands as a more sustainable option than any of the sites being bought forward by the Council within these Main Modifications.

The September 2018 SAA recognises land at Hook Farm and Hunts Farm as less preferable to that to the west of Fairlands. This is totally at odds to the findings of the numerous assessments on sustainability undertaken by the Council and referenced above.

The rationale given for the site’s exclusion is its need for access to run across Common Land, with the legal process necessary to secure access giving rise to unforeseen delays to delivery. However, Surrey County Council (SCC) has agreed to the principle of securing an access across the common, subject to terms and pursuant to the development providing a community benefit solution in the form of an alternative access to Worplesdon Primary School. Such an
alternative access is proposed as part of the development and has garnered the support from the school (see letter included at Appendix 3). Should the site benefit from an allocation with the inclusion of the primary school’s new access and parking, an expedited process can be undertaken in securing the necessary agreements to secure access over the Common Land. This is comparable to the Potential Development Areas at H8A&B, which are also reliant on access within Common Land but has not begun such negotiations with the County Council.

Paragraph 5.4.8 of the SAA excludes land west of Fairlands (though would equally apply to Hook Farm and Hunts) on the basis that a combination of one of the proposed Tier 8 sites alongside a development the size proposed for west of Fairlands (270 dwellings) would involve too great a reliance on the delivery of just two sites. The SAA goes on to immediately contradict itself by accepting that a reliance on two larger sites would equally apply to scenarios 1, 2 and 7, allowing these as potential strategies on the basis that these would align more closely to the spatial strategy. However, simply stating that the categorising of the Tier 8 sites as more closely in line to the spatial strategy than land at Fairlands is an inaccurate representation. Land at Hook Farm and Hunts Farm lies within 400m of Liddington Hall, was assessed as more sustainable within the 2017 SA, and provides the same accessibility options into major urban centres (in particular Guildford) as any of the Tier 8 sites.

The argument that an over-reliance on fewer sites increases risk also fails to paint a full picture. If fewer but larger sites are allocated, any delays to these sites would lead to a shortfall in delivery. However, equally the failure or delay in delivery of smaller sites would create a failure to meet the local housing need. What the SAA fails to recognise is the allocation of a greater number of sites increases the potential for individual sites to run into delivery problems. A greater number of sites results in the need for a greater number of planning applications, a reliance on a greater number of delivery agents and potentially a greater number of land deals, all of which increase the risk for delays to delivery within the early years of the Plan.

By contrast, Miller Developments represents a proven delivery partner, and controls the land at Hook Farm and Hunts Farm that is demonstrated as containing no absolute constraints to delivery, is in a highly sustainable location, and therefore can be delivered within the first five years of the Plan.

A further failure of the Council, which is reflected throughout its site selection process, is a failure to identify ‘exceptional circumstances’ to justify alterations to the Green Belt, as required by the NPPF (paragraph 83). The Plan makes one reference to exceptional circumstances6, stating that these exist in order to promote sustainable patterns of growth.

Miller Developments supports in principle the Council’s decision to make amendments to the Green Belt in order to accommodate sustainable development. In this regard, the tiered hierarchy within the SA prioritises the use of land outside of the Green Belt but recognises that in order to meet the housing and economic needs of the Borough, development within the Green Belt will be required. However, there has been a failure of the Council to seek opportunities for essential infrastructure that can be delivered in conjunction with sustainable housing development in order to form a more robust ‘exceptional circumstances’ case.

As demonstrated throughout our representations to the Plan, land at Hook Farm and Hunts Farm would deliver access to Worplesdon Primary School from the south, removing the majority of school traffic from the village; congestion within the village is a recognised and substantial local constraint. In this regard, SCC has confirmed (Appendix 4) that provision of a new access from the south is the only deliverable, comprehensive solution to the school traffic constraints in the village. Miller Developments has worked in conjunction with the school to design a new access and provide additional parking sufficient to alleviate existing congestion and future proof against expansion of the school in years to come.

This significant social benefit, combined with a housing development assessed by the Council as more sustainable than its competitors, represents considerably more robust ‘exceptional circumstances’ than is identified for other sites. Each of the additional proposed site allocations will provide solely a mix of housing tenures and site-specific mitigation necessary to make the proposed development acceptable in terms of its impact on the local environment.

5 Conclusions

Miller Developments supports the principle of Main Modifications being made to the Local Plan. However, there remain clear deficiencies which undermine its soundness. Though positive steps have been made, the Council has failed to
address fundamental flaws in its ability to meet in full the objectively assessed needs of Borough in the early years of the Plan, and in particular the delivery of affordable housing.

The additional sites selected by the Council to address delivery within these early years would deliver scattered and unsustainable development that doesn’t accord with the Plan’s spatial strategy.

In fact, the Council’s strategy seeks to prioritise development which can best benefit from its most sustainable settlement, namely Guildford. With a need to allocate sites within the Green Belt around villages, it is logical that those villages that can best benefit from the services within Guildford (without reliance on the A3), should be prioritised. The allocations being promoted by the Council are not the best sites to meet this objective.

By contrast, the land at Hook Farm and Hunts Farm, based on the Council’s own assessments comprises the most sustainable location for development when compared to the sites proposed for allocation within the Main Modifications. Furthermore, as is recognised by SCC and Worplesdon Primary School, the site represents the only opportunity to provide a comprehensive access solution to the school, alleviating existing congestion within Fairlands and future proofing for further expansions. This provides a more robust ‘exceptional circumstances’ case than can be demonstrated by the proposed additional allocations within the Plan as drafted. Any need for a legal agreement to create access over Common Land has been confirmed by SCC as acceptable in principle, subject to terms and pursuant to the delivery of a solution to access to the primary school.

Accordingly, we respectfully request the Council to revisits its Main Modifications and look again at its own evidence in order to inform site allocations capable of being delivered in the first five years of the Plan.

We would be very grateful for confirmation that these representations have been received. We trust that the comments are helpful and clear, however if you require further clarity on any of the comments made please do not hesitate to contact us.

for appendix see attachment

Attached documents: Miller Developments Rep_Redacted.pdf (7.2 MB)

Comment: MM27 - LPMM18/6240  Respondent: Miller Developments 11145825  Agent: Carter Jonas (Jamie Stanley)

4 Road Investment Strategy – MM27

It was generally accepted throughout the Examination that the Council has formulated a spatial strategy that places a great reliance upon the A3 corridor. This has resulted in a Local Plan with a significant reliance on the implementation of the Highways England “Road Investment Strategy” proposals for this route. This position is reflected within MM27 and specifically at paragraph 4.6.18a, which states “without the implementation of the A3 Guildford scheme, the cumulative impacts of the quantum and distribution of development in the Local Plan could be considered to become severe during the second half of the plan period”.

In this context, the principle established within MM27 to provide the need for a review should the circumstances around the A3 upgraded scheme change is supported in principle. However, it is not just the four strategic sites adjacent the A3 which rely to some degree on the delivery of the RIS scheme, but allocations across the Borough. This goes to the very heart of the spatial strategy focusing on sites in and around Guildford.

Accordingly, without the delivery of the proposed A3 RIS scheme, the Local Plan can no longer be considered deliverable. With the supply of housing historically suppressed and the resulting affordability crisis so acute, the Council should avoid timely and costly studies on short-term mitigation, and undertake a comprehensive review of the Plan focused on the delivery of sites that would not cause further significant impact to the A3.
3 Delivery Rates - MM41 and Appendix 1

The decision of the Council to increase the housing capacity at Garlick’s Arch is not contested within these representations. However, the suggestion that the site is capable of delivering 450 dwellings within the first five years of the Plan cannot be founded on a sound basis.

Whilst the Plan is assessed against the 2012 NPPF, the transitional arrangements within the revised Framework makes it clear that its policies will be a material consideration from day one of its publication and that greater due weight will be given to Local Plan policies that accord with the 2018 Framework. Accordingly, it is crucial that the Council’s purported five-year supply of ‘deliverable’ housing sites accords with the new definition. This states:

“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.” (Our emphasis)

The Council may point to the St Modwen v SSCLG and East Riding Court of Appeal decision in supporting the inclusion of such a projection within its trajectory. This concluded that sites may be included where they have a “realistic prospect” of coming forward for development. At the time, St Modwen had argued the Council could demonstrate a supply of around 7,000 dwellings based on sites with planning permission or a resolution to grant, plus a windfall allowance, compared to the claims of East Riding Council that it could demonstrate a supply closer to 15,000 dwellings by incorporating a wider range of sites without planning permission. Nearly 5 years on from that assessment, the actual housing completions in East Riding has failed to reach the Local Plan targets and is below even the 7,000 dwelling figure proposed by St Modwen. The decision of Government to incorporate this new definition within the NPPF is a clear indication for Councils to enact a step-change in the previously overly ambitious forward projecting.

For the site at Garlick’s Arch, it is appreciated that a Statement of Common Ground (SoCG) has been signed between the promoter (Ptarmigan Land) and the Council, providing a commitment to the delivery rates stated. However, what this document does do is to confirm the number of uncertain steps that remain prior to housing completions commencing on site.

Ptarmigan Land represents a strategic promoter and whilst it deals with housebuilders, it is not one itself. As confirmed at Appendix 3 of the SoCG (dated July 2018), there are no contracts in place between Ptarmigan and a housebuilder, nor is there a prospect of this occurring until after the adoption of the Local Plan at the earliest. Though there is a suggestion of a hybrid application under a JV (or similar) agreement, the most realistic prospect would be for Ptarmigan to sell the entirety of the site, or site parcels following obtaining an outline planning permission. Either way, there will be a significant lead-in time whilst applications are worked up, permission is sought, and contracts (both S106 and commercial) are negotiated and permission granted. Once the site is in the hands of a housebuilder (or two), these will need to seek reserved matters approved and discharge pre-commencement conditions before preliminary works on site to commence. It is noted that no application has been submitted nor has a date been provided for its anticipated submission. No Screening or Scoping Opinion has been submitted, nor has the potential need and time implications for requiring an EIA been appreciated within SoCG.
We would refer to the fact that the Inspector has been presented with the NLP research on housing delivery, including the detail that lead-in7 times for sites in excess of 500 units being over five years. Further research8 demonstrates that a single sales outlet on a development will typically generate 30–40 sales per annum. Even were the site to benefit from two sales outlets as suggested, yields would not realistically exceed 80 dwellings per annum at peak times.

Accordingly, even accounting for a generous first housing completion date of Q2 2022, and allowance for two outlets from day one, the site cannot be expected to be capable of delivering more than 240 dwellings within the first five years of the Plan compared to the 450 proposed by the Council.

footnotes

7 Planning approval, then planning to delivery periods
8 NLP Stock and Flow Planning Permissions and Housing Output January 2017

Attached documents:

Comment: MM43 - LPMM18/5857 Respondent: Miller Developments 11145825 Agent: Carter Jonas (Jamie Stanley)

2 Additional Site Allocations – MM39, MM43, MM44, MM45

Putting aside the continued failure of the Council to identify sufficient sites for delivery within the early years of the Plan, the additional sites proposed within the Main Modifications fail to both accord with the current strategy, whilst representing less sustainable locations than alternative deliverable sites.

As an example, at Hook Farm and Hunts Farm has the potential to accommodate approximately 150 dwellings, care home, substantial green infrastructure, and additional parking and a new access to Worplesdon Primary School, alleviating existing congestion within Fairlands. This development is of a comparable size to those proposed within the Main Modifications; however, represents greater community benefit within a more sustainable location close to the Guildford urban edge. The plans accompanying these representations demonstrate the ability of this development to provide an appropriately proportioned development alongside newly formed, defensible boundaries for the Green Belt.

For clarity, the additional sites favoured by the Council comprise:

• East of Glaziers Lane, Flexford (105 homes)
• Village extensions at:
• Urban extension at Aarons Hill, Godalming (200 homes)
• Hornhatch Farm, Chilworth (80 homes)
• Alderton’s Farm, Send Marsh (120 homes)

The selection process undertaken by the Council for these additional sites is highly contentious and, based on the evidence available to them at the time of making this decision is not founded on the results of the assessment before them.

As is detailed within the Council’s response “Measures to boost housing delivery in the early years in the context of an OAN figure of 630dpa + contribution to the wider HMA”, the decision to incorporate the above sites followed the Inspector’s note3 published on 22nd June and was made prior to the hearing session on 3rd July.

The SAA supporting the Main Modifications has since been published retrospectively to justify these decisions rather than used to help inform their allocations as the most appropriate additional sites. It is this process that helps explain the failure of the Council to demonstrate these additional sites represent sustainable development.

This results lead assessment is evident in the manipulation of the site options at each spatial tier. In particular, Tier 8 of the September 2018 SAA covers Green Belt around Guildford or Godalming/Farncombe. This is a deviation from the
earlier Sustainability Appraisals (SA), which informed the decision to allocate these sites, which defined Tier 8 sites as Green Belt around Guildford only. This change in approach coincided with the decision to include Aarons Hill, Godalming as an additional allocation. This site was previously assessed as a Tier 10 site.

However, the decision to include Tier 10 sites is not opposed by Miller Developments. In fact, we have emphasised the crucial role sites in these (Tier 10) villages can play in delivering much-needed homes within the early years of the plan period. Where the Council has erred is in the inconsistent and inaccurate approach to both site assessment and site selection.

Our Hearing Statement submitted to the Examination detailed flaws within the 2017 SA. This highlighted that the Council having prioritised three sites4 that had been assessed as ‘less sensitive’ Green Belt sites along with a further four ‘reasonable site options’5 that were within “higher sensitivity” Green Belt locations, deemed appropriate on the basis that these smaller sites that could be delivered in the first five years of the Plan. Three of these four sites now form the additional sites included at MM43-45 despite the Land Availability Assessment document concluding that they were contrary to the spatial strategy.

The SA uses only these as an example of Tier 10 sites capable of acting as a reasonable ‘variable’ from which to assess alternative strategies to the spatial strategy. This paints an inaccurate picture of how this alternative strategy could be implemented. In reality, there are other sites that are more sustainably located to the main urban centre of Guildford that can be provided in conjunction with, or as an alternative to the Council’s additional sites. The allocation of these sites would enable the Council to deliver a greater quantum of housing earlier in the Plan period. It is considered that the narrow assessment taken by the Council fails to give adequate consideration of these alternative options. These shortcomings highlight the failure of the Plan to be positively prepared or for the strategy to be truly justified.

In this context, land immediately to the south of Fairlands (comprising land at Hook Farm and Hunts Farm) has been completely overlooked as a reasonable alternative in the SA and the SAA despite it meeting the tests set out in the SA to a greater degree than any other of the Tier 10 sites.

footnotes
2 GBC-LPSS-020
3 ID/6
4 Land at Winds Ridge, ‘the Horsleys’, and land at Garlick’s Arch
5 Aldertons Farm, Land north east of Flexford, Land south of Halfway House, and Hornhatch Farm

The site lies immediately adjacent to the Fairlands settlement boundary, benefits from good road/public transport access to Guildford town centre and could be delivered in the first five years of the plan period. In addition, this proposal would alleviate a recognised local constraint by providing an alternative access and additional parking for Worplesdon Primary School. Furthermore, the Council’s Green Belt and Countryside Study Volume III states that Land Parcel H8 (incorporating land Hook Farm/Hunts Farm, which was identified as parcel H8C) provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt. Parcel H8C was considered to be “surrounded by defensible boundaries” and achieved a higher sustainability rating (ranked 5th) when compared with the 41 Potential Development Areas surrounding villages.

The table included at Appendix 1 demonstrates how land south of Fairlands compared to the sites at Aldertons Farm, Flexford, and Hornhatch Farm, as well as alternative sites at Fairlands (H8A&B).

This contrast is reflected within the individual assessment of the sites in the 2017 SA. The table included at Appendix 2, noting that the three Fairlands sites were assessed as a whole and applying a quantitative scoring system to the traffic light assessment undertaken, demonstrates Fairlands as a more sustainable option than any of the sites being bought forward by the Council within these Main Modifications.

The September 2018 SAA recognises land at Hook Farm and Hunts Farm as less preferable to that to the west of Fairlands. This is totally at odds to the findings of the numerous assessments on sustainability undertaken by the Council and referenced above.
The rationale given for the site’s exclusion is its need for access to run across Common Land, with the legal process necessary to secure access giving rise to unforeseen delays to delivery. However, Surrey County Council (SCC) has agreed to the principle of securing an access across the common, subject to terms and pursuant to the development providing a community benefit solution in the form of an alternative access to Worplesdon Primary School. Such an alternative access is proposed as part of the development and has garnered the support from the school (see letter included at Appendix 3). Should the site benefit from an allocation with the inclusion of the primary school’s new access and parking, an expedited process can be undertaken in securing the necessary agreements to secure access over the Common Land. This is comparable to the Potential Development Areas at H8A&B, which are also reliant on access within Common Land but has not begun such negotiations with the County Council.

Paragraph 5.4.8 of the SAA excludes land west of Fairlands (though would equally apply to Hook Farm and Hunts) on the basis that a combination of one of the proposed Tier 8 sites alongside a development the size proposed for west of Fairlands (270 dwellings) would involve too great a reliance on the delivery of just two sites. The SAA goes on to immediately contradict itself by accepting that a reliance on two larger sites would equally apply to scenarios 1, 2 and 7, allowing these as potential strategies on the basis that these would align more closely to the spatial strategy. However, simply stating that the categorising of the Tier 8 sites as more closely in line with land at Fairlands is an inaccurate representation. Land at Hook Farm and Hunts Farm lies within 400m of Liddington Hall, was assessed as more sustainable within the 2017 SA, and provides the same accessibility options into major urban centres (in particular Guildford) as any of the Tier 8 sites.

The argument that an over-reliance on fewer sites increases risk also fails to paint a full picture. If fewer but larger sites are allocated, any delays to these sites would lead to a shortfall in delivery. However, equally the failure or delay in delivery of smaller sites would create a failure to meet the local housing need. What the SAA fails to recognise is the allocation of a greater number of sites increases the potential for individual sites to run into delivery problems. A greater number of sites results in the need for a greater number of planning applications, a reliance on a greater number of delivery agents and potentially a greater number of land deals, all of which increase the risk for delays to delivery within the early years of the Plan.

By contrast, Miller Developments represents a proven delivery partner, and controls the land at Hook Farm and Hunts Farm that is demonstrated as containing no absolute constraints to delivery, is in a highly sustainable location, and therefore can be delivered within the first five years of the Plan.

A further failure of the Council, which is reflected throughout its site selection process, is a failure to identify ‘exceptional circumstances’ to justify alterations to the Green Belt, as required by the NPPF (paragraph 83). The Plan makes one reference to exceptional circumstances6, stating that these exist in order to promote sustainable patterns of growth.

Miller Developments supports in principle the Council’s decision to make amendments to the Green Belt in order to accommodate sustainable development. In this regard, the tiered hierarchy within the SA prioritises the use of land outside of the Green Belt but recognises that in order to meet the housing and economic needs of the Borough, development within the Green Belt will be required. However, there has been a failure of the Council to seek opportunities for essential infrastructure that can be delivered in conjunction with sustainable housing development in order to form a more robust ‘exceptional circumstances’ case.

As demonstrated throughout our representations to the Plan, land at Hook Farm and Hunts Farm would deliver access to Worplesdon Primary School from the south, removing the majority of school traffic from the village; congestion within the village is a recognised and substantial local constraint. In this regard, SCC has confirmed (Appendix 4) that provision of a new access from the south is the only deliverable, comprehensive solution to the school traffic constraints in the village. Miller Developments has worked in conjunction with the school to design a new access and provide additional parking sufficient to alleviate existing congestion and future proof against expansion of the school in years to come.

This significant social benefit, combined with a housing development assessed by the Council as more sustainable than its competitors, represents considerably more robust ‘exceptional circumstances’ than is identified for other sites. Each of the additional proposed site allocations will provide solely a mix of housing tenures and site-specific mitigation necessary to make the proposed development acceptable in terms of its impact on the local environment.
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Miller Developments supports in principle the Council’s decision to make amendments to the Green Belt in order to accommodate sustainable development. In this regard, the tiered hierarchy within the SA prioritises the use of land outside of the Green Belt but recognises that in order to meet the housing and economic needs of the Borough, development within the Green Belt will be required. However, there has been a failure of the Council to seek opportunities for essential infrastructure that can be delivered in conjunction with sustainable housing development in order to form a more robust ‘exceptional circumstances’ case.

As demonstrated throughout our representations to the Plan, land at Hook Farm and Hunts Farm would deliver access to Worplesdon Primary School from the south, removing the majority of school traffic from the village; congestion within the village is a recognised and substantial local constraint. In this regard, SCC has confirmed (Appendix 4) that provision of a new access from the south is the only deliverable, comprehensive solution to the school traffic constraints in the village. Miller Developments has worked in conjunction with the school to design a new access and provide additional parking sufficient to alleviate existing congestion and future proof against expansion of the school in years to come.

This significant social benefit, combined with a housing development assessed by the Council as more sustainable than its competitors, represents considerably more robust ‘exceptional circumstances’ than is identified for other sites. Each of the additional proposed site allocations will provide solely a mix of housing tenures and site-specific mitigation necessary to make the proposed development acceptable in terms of its impact on the local environment.

**Attached documents:**

**Comment:** MM41 - LPMM18/142  **Respondent:** Nigel Tallick 11151617  **Agent:**

In particular I would like to object to the developments MM44 and MM41.

As well as impacting on the heritage of the area around Send Marsh Green, MM44 also contradicts the Green Belt policy of MM9. This land has always been listed as green belt land and therefore other non-green belt sites should be considered
before developing this green belt land. In addition, the whole area around Send is at full capacity for what the current infrastructure can support, this includes:-

Roads
Schools
Doctors
Dentists

Send Villages Medical Practice is full, takes many days if not weeks to get a Doctor's appointment. Ripley has now lost is local primary school and only has one small dentist practice. The roads around this area are heavily congested at all times and safety is becoming an issue as more and more major accidents are happening on the A3 section parallel to the Send/Ripley area as well as parking being pretty non existent during peak times. With no local schools being able to take a large influx of new residents, this would result in yet more traffic as new residents would have to drive their children to distant schools outside of the local area.

Therefore, without substantial additional infrastructure to support the above, this area cannot support any more additional housing as shown in MM44 and MM41.

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**Attached documents:**
Comment: MM1 - LPMM18/4933  Respondent: John Harrison 11157345  Agent:

I have lived in Guildford for 24 years and am a recently retired Chartered Surveyor with experience of providing strategic and valuation advice to developers, corporates, banks and local and central government on mixed-use schemes in London and the Southeast with GDVs up to £1Billion.

I shall address a number of the MM’s individually but the principal concern is one of a number of omissions, particularly in MM3 S3: Town centre.

Considered master plans can be very effective in helping to bring development forward and encourage site assembly resulting in efficient use of land. Clear guidelines enable adequate certainty for prices to be negotiated and ensure that the winning bidder is not the one who is most intent on gaming the planning system.

The lack of such adopted master plans in Guildford has created a number of current problems. For example in the Walnut Tree Close area, there is a plethora of sui generis student housing applications because this avoids the social housing obligations. A bit of market research shows that nationally the type of self-contained units are proposed fetch around £12,000 a year in the rent making them irrelevant to your typical student I’m not therefore an optimal type of development. Residential applications on the river frontage there have been for up to 12 storeys which would adversely affect the development potential of sites on the opposite side of the road and is totally out of scale. The ad hoc approach results in no proper steps being taken to enhance the riverside frontage which could create a linear Park.

Similarly, there is no up-to-date master plan for the town centre, nor for the Bedford Road area, where Guildford Vision Group has been urging for the last eight years that the opportunity provided by a number of adjoining sites becoming available simultaneously should be seized. The council does not have to adopt the GVG proposal but it is short sighted to ignore the opportunity completely, and it has not offered a credible alternative means to reduce congestion on the hated one-way system.

Such crucial matters are still absent from the Modified Local Plan although at the Inspector’s request a hasty town centre policy has been added but this is necessarily substantially out of date. Further, it is limited to the town centre and there is no policy for the wider urban area such as that in which I live and where there is very substantial development pressure. This is a major omission and an appropriate, considered “S4” policy should be added. It is for reasons such as these that, I believe the plan is still unsatisfactory and call upon the Inspector to reopen the examination to ensure that the once in 100 year opportunities are properly considered and to avoid the type of skewed development that could take place in Walnut Tree Close which has become some kind of developer Klondike. There are several areas that should be designated strategic sites in order that the town centre is properly planned.

MM1 S1 the word appropriate could be a helpful addition: “sustainable appropriate development”. This might be helpful in the context of sui generis proposals such as student housing or Costco retailing, or other things not yet thought of, where there is no real policy but they might be inappropriate. When I was in practice getting something deemed sui generis was a major victory as it enabled a coach and horses to be driven through most planning policies. This might prevent that happening here.

MM1 Policy (3)(a). The blanket presumption that acceptable mitigation in the form of the SANG tax produces perverse results. The charges are substantial but the additional monitoring fees are no doubt welcome council income. Town centre housing development should be exempt from these provisions where the effect, particularly from flats, is likely to be minimal and could be rendered so by a prohibition on dogs. On a current application, a house near here fronting the Downs (a large and well used dog walking area despite the presence of ground nesting birds) there is still a requirement to pay the tax. Developers swallow it in order to get to consent but then use this in their viability studies to reduce or avoid social housing contributions. This policy is all about the tax and income generation and serves the community badly. It should be applied selectively in a considered manner.

The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline “12 years to limit climate change catastrophe” which is within the Plan period. The scientific consensus calls for “urgent and unprecedented changes” to limit the use of fossil fuels. The plan (MM1 S1 and MM24) in no way reflects the urgency or importance called for. The Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy and that best practice towards sustainability is adopted. The crucial omission are policies aimed at reducing car usage which should not only be included in these MMs, but also MM9 (P2 Greenbelt development),
MM14 (E2 Employment) and MM5 (H1 Homes for all) limiting private parking and requiring employee car sharing for example "park and share" rather than park and ride given the decentralised nature of the business parks.

Attached documents:

**Comment: MM2 - LPMM18/4934**  **Respondent: John Harrison 11157345**  **Agent:**

MM2: The housing figures are now completely out of date following revisions by ONS. The GRA expert has demonstrated that about 360 homes per year would support the ambitious economic rate of growth proposed by the inspector. The 630 figure is based on inappropriate assumptions that inflate the numbers e.g. excessive student homes in the town and, low economic participation etc. Consequently proposals for development in the greenbelt need to be reconsidered. There is potential to remove at least one site. Any greenbelt development should be limited to those that will incorporate rail links.

MM2 and MM27 ID2 Not only does Guildford have exceptionally high levels of congestion, infrastructure more generally is close to capacity. This is particularly the case for electricity and there were a number of brief blackouts last winter; this is widely known amongst the major developers. Electricity supply does not even seem to come within the definition of infrastructure in ID2 which seems to be narrowly defined to that in respect of which contributions can be extracted from developers. The constraints are real and should be considered as a whole and the MM should be amended. Consequently it is particularly perverse for Guildford to provide homes for Woking when Guildford is more constrained and when the ONS revisions will also reduce significantly the amount of housing Woking requires. The whole issue needs to be examined again and accordingly the **Inspector should reopen the enquiry.**

Attached documents:

**Comment: MM23 - LPMM18/4940**  **Respondent: John Harrison 11157345**  **Agent:**

MM23 Policy D1 (3) the original draft related to residential developments in excess of 25 units, but the redraft states it will apply to **all** development, whilst the original D4 has been deleted.

The new D1 is still headed Place Making and all the issues (e.g. "landscape character") really relate to major development. However, since it says all developments - and D4 seems to have been dispensed with - it seems to me that it needs at least a new subsection covering normal small-scale development, including extensions, that comprise 99% of applications. This is not a minor drafting matter. It seems a big omission so I wonder if this is by accident. But it seems yet another example of the modifications being made too hastily. It is important that these everyday developments relate to neighbouring and adjoining property in terms of scale, massing, materials and design; that they are not overbearing or otherwise adverse in their impact. As drafted it seems to me that none of these ordinary controls might be available; one could envisage a **legal challenge** around this. Since this omission relates to the vast majority of applications I believe the **Inspector should reopen the examination** so that the issues can be properly considered.

MM23 Policy D1 The council is a major landowner and controls and number of sites within the town centre. There is clearly a significant potential conflict of interest between its obligation to maximise the value of its estate and its role as planning authority. It should be clear that the council accepts the same obligations as any other landowner.

MM23 Policy D1 (12) refers to "including passive solar gain to maximise the use of the sun’s energy for heating and cooling". This appears a very muddled and dangerous statement. Passive solar gain is a double-edged sword because what may be beneficial in cool months can lead to overheating in the summer. This can lead to uncomfortable living conditions or the desire for air conditioning, particularly in commercial buildings or residential properties with large
south facing glazed areas. There is a real risk that this well-intentioned idea could have the perverse effect of increasing energy demand for cooling particularly in flats and large houses aimed at overseas buyers and others not constrained by the cost of energy. There is a real danger that, as stated, this policy is seized upon for excessively large windows breaching many concerns of privacy and aesthetics, and ending up being counter-productive from a conservation perspective. To apply this policy effectively the Council would need to understand and apply criteria covering extent of glazing, type of glazing (modern glass has reflective coatings aimed at increasing the greenhouse effect) and aspect. Maybe this is available in the building regulations but if so the plan should make reference to this. To be effective year round there really needs to be solar screening on the southern elevation which would ideally be movable screening. The plan should require this for commercial buildings and flats. This is another example of how poorly thought through the plan is.

Attached documents:

Comment: MM24 - LPMM18/4936  Respondent: John Harrison 11157345  Agent:

MM27 MM24 I could find no reference to wind turbines or commercial solar power generation. The council should have a policy for where these can and cannot be sighted having regard to existing cable routes, landscape quality and other material factors: Another important area where the plan falls short. Similarly I could see no reference to fracking. We need to leave around 80% of proven hydrocarbon reserves in the ground to avoid catastrophic global warming. The borough is variously densely populated and of exceptional landscape quality. Together these are good reasons for a policy against fracking here. Another reason to reopen the enquiry.

Attached documents:

Comment: MM27 - LPMM18/4935  Respondent: John Harrison 11157345  Agent:

MM27 MM24 I could find no reference to wind turbines or commercial solar power generation. The council should have a policy for where these can and cannot be sighted having regard to existing cable routes, landscape quality and other material factors: Another important area where the plan falls short. Similarly I could see no reference to fracking. We need to leave around 80% of proven hydrocarbon reserves in the ground to avoid catastrophic global warming. The borough is variously densely populated and of exceptional landscape quality. Together these are good reasons for a policy against fracking here. Another reason to reopen the enquiry.

Attached documents:

Comment: MM27 - LPMM18/4939  Respondent: John Harrison 11157345  Agent:

MM27 The plan states that the A3 runs through the centre of the borough and in the appendix that it contributes to congestion. The council pledges to support the Highways Agency proposals to improve conditions but it should use its local knowledge to consider whether those proposals are optimal and it should ensure that future development does not make matters worse, which suggests that major out-of-town development should not be commenced before the improvements are complete, or at least irrevocably approved. An alternative to widening is a tunnel to separate through traffic from local traffic. This will avoid the major noise, pollution and visual impact of the widening and noise attenuation measures which are likely to be strongly resisted by local residents so may not happen. It is a major design
flaw that local traffic has to use the A3. For example, from some locations there is no alternative way to get to the A3 cathedral exit, which serves the University and Tesco, without getting onto the A3 from the A25 for a short hop. This is a highly unsatisfactory arrangement when the A3 is carrying large amounts of through traffic given the short length of the A25 slip road and it's very high usage. The proposed improvement of the A3/M25 junction, whilst valuable in itself, is likely to increase usage of the A3 if anyone has learnt anything about road improvements over the last 50 years, meaning there will be even more traffic passing through the middle of Guildford.

It is worth reflecting that the Guildford bypass was opened in 1934. That is 84 years ago. In any other comparable town the other half of the ring road would have been constructed by now effectively doubling capacity. Clearly this has not been done due to the landscape quality to the south of the town, but that Guildford has not received adequate major infrastructure investment explains why it is more congested than any comparable sized town. It is the 6th most congested in the UK and the 10th most in Europe at peak times. There is now the threat of unprecedented quantities of development in Greenbelt locations as well as expectations of organic growth, with no precondition about solving the current mess. The solution is out of Guildford's hands and it is therefore unsound to rely on the widening being made in time, and solving the problem, when there is no guarantee that this will be the case, but that major development might proceed in any event.

Attached documents:

Comment: MM3 - LPMM18/4937  Respondent: John Harrison 11157345  Agent:

MM3: S3. The biggest issue within Guildford is peaktime congestion. This doubles fuel consumption and therefore doubles the amount of carbon being produced. Accordingly, there is disproportionate benefit in reducing the amount of traffic, say to that typical during school holidays. There is no clear proposal to reduce the current level of congestion, policies seem to be limited to new development. What does “drive to, not through” mean in the context of a gap town? How will priority to pedestrians and cyclists over motor vehicles be given: A man on point duty or a form of road pricing/congestion charging, or attempts at persuading schools to educate children as to the benefits of walking? There should be clear targets and mechanisms identified in the plan aimed at improving the current position. The council was recently addressed by Dr Steve Melia, a traffic expert, who stated that to be effective it would be necessary to use a stick as well as a carrot. This presents problems for elected councillors. The purpose of a plan such as this is to hold their feet to the fire and ensure difficult issues are addressed and dealt with, particularly those which extend over several election cycles. Bland statements of desire are meaningless, have proved ineffective in previous plans, and would prove ineffective in this one if allowed to persist. The council acknowledges the problem but refuses to grasp the nettle. Much greater priority should be given to creating safe and attractive pedestrian and cycle routes. Some pedestrian routes, e.g. Porridge Pot Ally and the bridges over the river near the Yvonne Arnold theatre could be extended to cycle use. Mill Lane could be open to cyclists in both directions whilst remaining one way only for cars. The plan is unsound environmentally and I call upon the inspector to reopen the examination in order to improve it.

MM3: S3 (1) is inadequate and should say, for instance, development proposals will be rejected as premature if the Council believes a more satisfactory solution would result if the applicant property were combined with (specified) others. I find the current wording clumsy and ambiguous.

MM3 S3 (3) is ambiguous and unworkable. What is the most efficient use of land? Does it mean of the applicant site in isolation or does it contemplate site assembly? Does it imply, for example, a requirement for basement car parking rather than surface parking? To what constraints is it subject e.g. height and the impact on views, overlooking and of the street scene? Does it involve a financial test? Is it subject to a viability appraisal? This would add a huge layer of cost and delay. The draft is ambiguous because not enough time has been spent in considering it. For reasons such as this the plan is unsound.

MM3 this hastily added Town centre section fails to cover the wider urban area for which a new "policy S4" is needed. I moved to Guildford because it is one of few towns where family housing with gardens is available within walking distance of a main line Rail link to London. Areas such as Guildown where I live and Pewley have this valuable and...
sought-after characteristic which should be conserved. Generally therefore development in your back garden should be resisted even though it might provide an attractive pension. I would suggest there should be a presumption against such development unless there is independent highway access to both existing and proposed new dwellings. In the garden behind me a new house has just been completed 20 years after application was first submitted. The access is poor and it depends for light and air on overlooking my property. There were boundary disputes with two adjoining owners and most recently they cut down trees on my property whilst they have not completed any boundary treatment of their own notwithstanding the 2 meter fence clearly shown on the approved plans and it is unlikely that the enforcement team pursue it. Garden grabbing is very rarely acceptable development and can be disproportionately disruptive. A considered policy would prevent decades of attrition and successive appeals. This omission really needs dealing with since it's a major issue in Guildford.

MM3 An “S4” policy could and should also incorporate strategic site designation for a number of locations mentioned above such as Walnut Tree Close and Bedford Road which could then be masterplanned. These are needed now. You should familiarise yourself with the rural section of the Mount where the rear gardens of large houses fronting Upper Guildown road, which have a frontage to the Mount, are being developed on an ad hoc basis into six bedroom detached houses. Each plot is around an acre and so this is very inefficient use of land within walking distance of the town centre. Although widely resisted there is some logic in development here (I have no personal financial interest in this). At one point in the saga, individual houses were refused for under development and the response application was a block of flats of 40 units to the hectare which was refused on appeal. Optimum development would be somewhere in between and would involve combining plots rather than sticking to the historic garden boundaries. Another example of a lack of proper planning producing a poor outcome but where there would still be time to change and most certainly learn from the principle.

MM3: And finally an “S4 policy” could be designed to deal with all the complex issues which exist in an established urban area, but which is not a town centre where the dominant land uses are commercial. Whilst there could be some commonality between S3 and S4, having a separate S4 and clearly thinking through the issues would be hugely beneficial. Without this I fear there will be decades of anachronisms resulting in adverse development decisions.

Attached documents:

Comment: MM2 - LPMM18/3843 Respondent: Andy Freebody 11160001 Agent: 11160001

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society and the Guildford Residents’ Association and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.
MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/3846  Respondent: Andy Freebody 11160001  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM3 - LPMM18/3844  Respondent: Andy Freebody 11160001  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM31 - LPMM18/3847  Respondent: Andy Freebody 11160001  Agent:
MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment:** MM32 - LPMM18/3848  **Respondent:** Andy Freebody 11160001  **Agent:**

MM32 A height limit for **White Lion Walk** is required

**Attached documents:**

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**Comment:** MM33 - LPMM18/3849  **Respondent:** Andy Freebody 11160001  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

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**Comment:** MM35 - LPMM18/3850  **Respondent:** Andy Freebody 11160001  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/3851  **Respondent:** Andy Freebody 11160001  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.
MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Comment: MM9 - LPMM18/3845  Respondent: Andy Freebody 11160001  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Comment: MM2 - LPMM18/4294  Respondent: David Avery 11164225  Agent:

I am writing to OBJECT to the local plan Main Modifications as outlined below and would strongly request that you LISTEN to those mostly effected and stop your crazy plan. We the residents of Send & Ripley et al repeatedly tell you to leave our villages alone but you never listen! Stop placing the councils financial kick-backs from developers above the wants and needs of local residents. You work for us and we pay your wages so, please LISTEN and ACT on what we ALL tell you, STOP!

Apparently this consultation only allows me to comment on the main modifications and so excludes the chance for me to object AGAIN to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable. For the avoidance of doubt I still object again to these developments.

Comment: MM27 - LPMM18/4299  Respondent: David Avery 11164225  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/4295  Respondent: David Avery 11164225  Agent: 

MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
- It is Green Belt containing ancient woodland
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

Comment: MM42 - LPMM18/4300  Respondent: David Avery 11164225  Agent: 

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/4296  Respondent: David Avery 11164225  Agent: 

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

Attached documents:

Comment: MM42 - LPMM18/4301  Respondent: David Avery 11164225  Agent:

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/4297  Respondent: David Avery 11164225  Agent:

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self-build**

• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
• It is a Green Belt site with no special circumstances so it also contradicts policy MM9
• It will detract from the heritage buildings at Send Marsh Green
• The additional traffic will increase pressure on the Send Crossroads
• With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/4302  Respondent: David Avery 11164225  Agent:

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/4298  Respondent: David Avery 11164225  Agent:
MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM12 - LPMM18/4658  Respondent: Bridge End Farm, Ockham (Julian and Nicola Harris) 11268769
Agent: CBRE Ltd (Phoebe Juggins)

MM12

Given that the requirement for addressing Habitats Regulations is governed by a separate regime, and in light of the implications of recent case law, it is suggested that in order to maintain absolute er the requirements and robust approach to HRA and Appropriate Assessment, that the policy refer to legislation and best practice, rather than setting this out within the text of the plan, given the potential for updates to guidance and legislation over the course of the plan period. GBC should retain flexibility to allow the most up to date regime to be followed.

The reference to all proposals requiring Appropriate Assessment within 5km of the SPA as set out at the proposed change to 4.3.50c is not in accordance with the Regulations and instead reference should be made to the requirements of the Regulations (i.e. screening), as it is not in accordance with the Regulations to immediately require Appropriate Assessment in every case.

Attached documents:

Comment: MM2 - LPMM18/4655  Respondent: Bridge End Farm, Ockham (Julian and Nicola Harris) 11268769
Agent: CBRE Ltd (Phoebe Juggins)

Guildford Local Plan – Main Modifications Consultation

Further to our engagement with and appearance at the Examination in Public in association with the Guildford Local Plan, on behalf of Land at Bridge End Farm (which is part of the wider site allocation for Former Wisley Airfield), we have taken this opportunity to provide representations with regard to the Main Modifications proposed to the Submission Local Plan.

CBRE acts for Julian Harris and Nicola King as Trustees of the J R Harris Discretionary Settlement, in respect of their landholdings ‘Land at Bridge End Farm’, which is included within the site allocation A35 Former Wisley Airfield.

CBRE is working on our clients’ behalf on the early stages of a planning application strategy including evidence base work and seasonal ecology surveys to ensure that a robust planning application can come forward on the site in due course.

Our response to the relevant proposed modifications is set out below.

MM2
We support the intention of the Local Plan to meet GBC’s objectively assessed housing needs and seek to adopt a plan which meets this requirement within the first five years of the plan period, in accordance with national planning policy.

We would seek to reiterate a point made at the Examination, that the site allocation at Former Wisley Airfield for 2,000 units, should be considered a minimum and that it is likely that the site will be able to offer a greater capacity than this, in accordance with the NPPF which seeks to make the most efficient use of land.

**Attached documents:**

**Comment:** MM23 - LPMM18/4659  **Respondent:** Bridge End Farm, Ockham (Julian and Nicola Harris) 11268769  **Agent:** CBRE Ltd (Phoebe Juggins)

**MM23**

We support the inclusion of Policy D1, which proposes a comprehensive approach to the design of places. This policy provides a helpful framework to guide the development management process for both applicants and GBC, and we consider that its structure will assist in bringing forward planning applications for high quality places.

Points (15) and (16) relate specifically to strategic site masterplans. GBC has commenced work on these strategic masterplans and we have actively engaged with other stakeholders, landowners and GBC officers. We look forward to undertaking further work in this regard.

However, we would like to ensure that this work does not prejudice the progress of any planning application preparation work that may be ongoing, and also to clarify that the role of these masterplans is to act as strategic and high level framework documents, establishing key principles and suggestions rather than acting as a rigid approach to each site. This is particularly pertinent to sites with multiple landowners given that they could come forward in a variety of phases.

**Attached documents:**

**Comment:** MM40 - LPMM18/4660  **Respondent:** Bridge End Farm, Ockham (Julian and Nicola Harris) 11268769  **Agent:** CBRE Ltd (Phoebe Juggins)

**MM40**

We support the proposed amendments to Policy A35, but also suggest that a specific design requirement ensuring interconnectivity across the site allocation is included, to ensure that the site layout is flexible enough to respond to the inevitable phasing of the large strategic site which comprises more than one land ownership.

**Attached documents:**

**Comment:** MM2 - LPMM18/3437  **Respondent:** Bewley Homes 11458241  **Agent:** Neame Sutton Limited (David Neame)

**1.0 Instructions and Introduction**
1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by the Bewley Homes Plc (“Bewley Homes”) to prepare and submit representations in relation to the schedule of Main Modifications proposed by Guildford Borough Council (“the Council”) to the Guildford Borough Local Plan 2018 (“the Plan”).

1.2 This document covers the following matters:
• Section 2 Representations on the Main Modifications
• Section 3 Areas where further Modifications are required in order for the Plan to be found Sound

1.3 These Representations follow on from the Evidence presented by Bewley Homes in its Matters Statements and orally at the Examination, particularly in relation to the Matter 17 session dealing with the Ash and Tongham allocation (Policy A29).

1.4 For the avoidance of doubt Bewley Homes’ also supports in full the representations made by the Guildford Housing Forum, which it is a member.

1.5 The relevant Main Modification references are identified at the appropriate points within this document.

2.0 Representations on Main Modifications

(i) General Housing Requirement and Land Supply Matters

MM2 – Policy S2 – Spatial Strategy

MM46 – Appendix 0 Housing Trajectory

2.1 Bewley Homes is in full support of the representations submitted by the Guildford Housing Forum in relation to the housing requirement and general housing trajectory matters. It is clear that the Council has not gone far enough to address the problem of early years delivery in order to be able to maintain a robust 5-year housing land supply in the early stages of the Plan period.

2.2 It is clear from a review of the Sustainability Appraisal (“SA”) Addendum1 that the Council has in fact only pursued the approach it set out to the Inspector at the Examination hearing sessions in response to his note ID-006, namely to introduce a limited number of further Green Belt allocations.

2.3 The issue with the approach taken by the Council is that it has failed to properly consider all reasonable alternative options for boosting early years supply. Additionally the Council has not sought to adjust or update its housing delivery trajectory to take account of key changes in circumstance, particularly in relation to Wisley, which as the Forum identifies will result in delay to the delivery of housing completions on that site.

2.4 In Bewley Homes’ view the Council has overlooked two key sources of supply that could deliver easily within the early years of the Plan period:

2.4.1 Ash and Tongham Allocation – As presented in Bewley Homes’ Matters Statement and in oral evidence at the hearing session it is clear that the Ash and Tongham allocation area has potential to deliver between 130 – 300 additional dwellings in the first five years of the Plan period 2.

2.4.2 The Council has simply dismissed the concept of additional housing provision within the Ash and Tongham area without any sound reason for doing so. The Council’s suggestion that the market cannot absorb further housing in this area is simply unsupported by any evidence and does not amount to a reason to resist making best use of one of the most sustainable locations in the Borough and the only strategic allocation outside of the Green Belt.

2.4.3 Selective Releases Around Green Belt Villages – The approach the Council has taken is simply to add in a small number of locations that it had previously considered without properly considering all available options in a holistic manner. The consequence of this approach is that the Council has overlooked suitable and sustainable development opportunities around other Green Belt villages that would a) accord with the spatial strategy set out in the Plan b) avoid any impact with the A3 RIS and c) could deliver housing early in the Plan period.
2.4.4 Two such settlements are Horsley and Effingham. Both of these locations have capacity to accommodate further smaller scale residential development in a sustainable manner that would make a positive contribution to delivery in the early years of the Plan period.

2.4.5 PDL in the Green Belt – The Council has in fact reduced the capacity it envisages from this component of its supply. Whilst the reason for this is set out in the SA3 the Council has merely reacted to a change in circumstance for an individual site rather than undertaking a reassessment of the potential for delivery from this supply source as a whole. In Bewley Homes’ view there is greater potential from this source in suitable and sustainable locations that could again make a meaningful contribution to early years delivery. In particular an opportunity exists in Woodstreet Village4 that the Council has not properly explored. Although included in the PDL category the site in question has a greater capacity than the Council has allowed for in its supply.

2.5 As a consequence of the above points it is Bewley Homes’ view that the Council has not properly considered the Inspector’s interim findings that required a full review of all options to deal with early years delivery and ensure a robust housing delivery strategy. It is clear that there are options the Council has simply chosen to ignore and consequently opportunities have been missed that would make a valuable contribution to the early years supply.

Attached documents:

Comment: MM38 - LPMM18/3439  Respondent: Bewley Homes 11458241  Agent: Neame Sutton Limited (David Neame)

(ii) Modifications to Policy A29

MM38 – Policy A29 – Land to the South and East of Ash and Tongham

2.6 At the Matter 17 session dealing with Policy A29 – Ash and Tongham a number of specific points were discussed in relation to the wording of the policy. The Inspector requested and, the Council agreed, to make a series of changes to the wording of the policy, as follows:

• The reference to ‘rural landscape’ in part (6) of the Policy was to be deleted and replaced with ‘character of the area’ in recognition of the fact that the whole area is a strategic allocation and by definition is no longer rural; and,

• The reference in part (8) of the Policy to views to and from the heritage asset including the approach from White Lane being protected was to be replaced with the standard definition to preserve the setting of the heritage asset as defined in the Legislation.

2.7 Having agree these two points with the Inspector at the hearing session it is somewhat surprising to see that the main modifications seek to reinstate the original points and to completely ignore the Inspector’s request and the position agreed with senior officers and Counsel for the Council.

2.8 It is a matter of fact that the area in the Policy A29 allocation cannot be considered rural because the very act of allocating the land for housing brings the whole area into the urban area of Ash and Tongham. A policy requirement that seeks to protect the ‘rural landscape’ is therefore at odds with the allocation. Furthermore the requirement within the policy at Part (6) that seeks to maintain separation between Ash and Ash Green in the vicinity of Ash Green Road is also at odds with the allocation, which envelopes both sides of Ash Green Road into the urban area of Ash in any event.

2.9 With regard to the Heritage Asset (Ash Manor) the requirement to maintain views to and from the approach from White Lane would actually necessitate the felling of trees and vegetation in order to create a view that does not currently exist. In other words the policy seeks to protect something that is not currently a feature of the setting of the Listed Buildings. This is at odds with the requirements of Legislation and also the position agreed with the Inspector at the
Examination hearing sessions wherein the statutory definition to preserve the setting of the Listed Buildings was to be inserted into the policy.

2.10 The policy wording therefore needs to be amended.

Attached documents:

**Comment:** MM46 - LPMM18/3438  **Respondent:** Bewley Homes 11458241  **Agent:** Neame Sutton Limited (David Neame)

**2.0 Representations on Main Modifications**

(i) **General Housing Requirement and Land Supply Matters**

**MM2 – Policy S2 – Spatial Strategy**

**MM46 – Appendix 0 Housing Trajectory**

2.1 Bewley Homes is in full support of the representations submitted by the Guildford Housing Forum in relation to the housing requirement and general housing trajectory matters. It is clear that the Council has not gone far enough to address the problem of early years delivery in order to be able to maintain a robust 5-year housing land supply in the early stages of the Plan period.

2.2 It is clear from a review of the Sustainability Appraisal (“SA”) Addendum1 that the Council has in fact only pursued the approach it set out to the Inspector at the Examination hearing sessions in response to his note ID-006, namely to introduce a limited number of further Green Belt allocations.

2.3 The issue with the approach taken by the Council is that it has failed to properly consider all reasonable alternative options for boosting early years supply. Additionally the Council has not sought to adjust or update its housing delivery trajectory to take account of key changes in circumstance, particularly in relation to Wisley, which as the Forum identifies will result in delay to the delivery of housing completions on that site.

2.4 In Bewley Homes’ view the Council has overlooked two key sources of supply that could deliver easily within the early years of the Plan period:

2.4.1 **Ash and Tongham Allocation** – As presented in Bewley Homes’ Matters Statement and in oral evidence at the hearing session it is clear that the Ash and Tongham allocation area has potential to deliver between 130 – 300 additional dwellings in the first five years of the Plan period.

2.4.2 The Council has simply dismissed the concept of additional housing provision within the Ash and Tongham area without any sound reason for doing so. The Council’s suggestion that the market cannot absorb further housing in this area is simply unsupported by any evidence and does not amount to a reason to resist making best use of one of the most sustainable locations in the Borough and the only strategic allocation outside of the Green Belt.

2.4.3 **Selective Releases Around Green Belt Villages** – The approach the Council has taken is simply to add in a small number of locations that it had previously considered without properly considering all available options in a holistic manner. The consequence of this approach is that the Council has overlooked suitable and sustainable development opportunities around other Green Belt villages that would a) accord with the spatial strategy set out in the Plan b) avoid any impact with the A3 RIS and c) could deliver housing early in the Plan period.
2.4.4 Two such settlements are Horsley and Effingham. Both of these locations have capacity to accommodate further smaller scale residential development in a sustainable manner that would make a positive contribution to delivery in the early years of the Plan period.

2.4.5 PDL in the Green Belt – The Council has in fact reduced the capacity it envisages from this component of its supply. Whilst the reason for this is set out in the SA3 the Council has merely reacted to a change in circumstance for an individual site rather than undertaking a reassessment of the potential for delivery from this supply source as a whole. In Bewley Homes’ view there is greater potential from this source in suitable and sustainable locations that could again make a meaningful contribution to early years delivery. In particular an opportunity exists in Woodstreet Village that the Council has not properly explored. Although included in the PDL category the site in question has a greater capacity than the Council has allowed for in its supply.

2.5 As a consequence of the above points it is Bewley Homes’ view that the Council has not properly considered the Inspector’s interim findings that required a full review of all options to deal with early years delivery and ensure a robust housing delivery strategy. It is clear that there are options the Council has simply chosen to ignore and consequently opportunities have been missed that would make a valuable contribution to the early years supply.

Attached documents:

**Comment:** Other comments - LPMM18/3440  **Respondent:** Bewley Homes 11458241  **Agent:** Neame Sutton Limited (David Neame)

3.0 Areas Where Further Modifications Are Required

3.1 On the basis of these representations Bewley Homes’ considers that the following further modifications are required for the Plan to be capable of being found Sound:

1. The Council needs to revisit its appraisal of the options for meeting early years delivery and in particular to consider the potential from the following sources:

   • Ash and Tongham allocation
   • PDL in the Green Belt
   • Release of land around Green Belt villages

2. The Council needs to reword Policy A29 to bring the text at Parts (6) and (8) into line with the position it agreed with the Inspector at the Matter 17 hearing session as set out in Section 2 above.

3.2 Without these changes Bewley Homes’ does not consider the main modifications are sufficient to meet the tests of soundness.

Attached documents:

**Comment:** MM2 - LPMM18/6014  **Respondent:** Karen Lord 11550561  **Agent:**
I am finding the use of green belt for special circumstances in Send, in comparison to other areas out of balance. We are a village and would welcome this generation to maintain this. We feel our 7000+ objections to the earlier plan have been ignored and even more housing etc added.

POLICY S2
At the public examination the figure for Guildford Borough Council, the housing need used by the inspector was 789 per year. It seems this and was exaggerated as it included Surrey University Student figures. can we see how these figures were calculated by the consultants and GBC.

Attached documents:

Comment: MM27 - LPMM18/6016  Respondent: Karen Lord 11550561  Agent:

MM27. MM41. MM42 and MM48 TRANSPORT STRATEGY
The increased traffic for Send from Burnt Common, Garlicks Arch, Clockbarn, Aldertons as well as Gosden Hill and Wisley Ockham is properly been addressed by the road changes of the A3 and Clandon Slip Roads.
The massive increase in traffic going to and from Woking along Send Barns Lane and Send Road will cause air pollution delays and gridlock in our village.

Attached documents:

Comment: MM41 - LPMM18/6020  Respondent: Karen Lord 11550561  Agent:

MM41 Land at Garlicks Arch,Send Marsh Policy A43
I object to the increase from 400 to 550 houses as well as the 450 are to be built in the first 5 years. This is an increase of 37% in the number of houses to be built. This over development will effectively join Ripley to Send and destroy both villages indivuality.

The extra thousand cars and between over 1600 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

It is such a shame for democracy that with 7000 objections to the earlier plan seem to have been ignored and more houses etc added?

MM27. MM41. MM42 and MM48 TRANSPORT STRATEGY
The increased traffic for Send from Burnt Common, Garlicks Arch, Clockbarn, Aldertons as well as Gosden Hill and Wisley Ockham is properly been addressed by the road changes of the A3 and Clandon Slip Roads.
The massive increase in traffic going to and from Woking along Send Barns Lane and Send Road will cause air pollution delays and gridlock in our village.

Attached documents:

Comment: MM42 - LPMM18/6021  Respondent: Karen Lord 11550561  Agent:
MM42 Land at Burnt Common, London Road, Send  Policy A58
The Employment Lands Needs Assessment showed a reduction in demand for Industrial Land but Send will have largest
industrial allocation in any village in the Guildford Borough.
This is a further increase of 25% making it a huge increase in Send, bigger than any other village.
There is no need for new industrial sites when Slyfield is has unused capacity. There are NO SPECIAL
CIRCUMSTANCES so it contradicts MM9.
There is no need to put Industrial premises in our precious GREEN BELT, except if as a Council Cabinet you want to
punish Send.
This plan has since been deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.

MM27. MM41. MM42 and MM48 TRANSPORT STRATEGY
The increased traffic for Send from Burnt Common, Garlicks Arch, Clockbarn, Aldertons as well as Gosden Hill and
Wisley Ockham is properly been addressed by the road changes of the A3 and Clandon Slip Roads.
The massive increase in traffic going to and from Woking along Send Barns Lane and Send Road will cause air pollution
delays and gridlock in our village.

Attached documents:

Comment: MM44 - LPMM18/6022  Respondent: Karen Lord 11550561  Agent:

MM44 Land at Aldertons Farm, Send Road, Policy A63.
New site for 120 homes which was deleted because of objections and not reinserted until the public examination in
JULY.
With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN
INCREASE OF 45%
How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked
stressful environment.
Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

Attached documents:

Comment: MM48 - LPMM18/6019  Respondent: Karen Lord 11550561  Agent:

MM27. MM41. MM42 and MM48 TRANSPORT STRATEGY
The increased traffic for Send from Burnt Common, Garlicks Arch, Clockbarn, Aldertons as well as Gosden Hill and
Wisley Ockham is properly been addressed by the road changes of the A3 and Clandon Slip Roads.
The massive increase in traffic going to and from Woking along Send Barns Lane and Send Road will cause air pollution
delays and gridlock in our village.

Attached documents:

Comment: MM9 - LPMM18/6015  Respondent: Karen Lord 11550561  Agent:

MM9 GREEN BELT POLICY
I feel that land on the ever increasing edges of the village can be picked off by developers and is opportunities for speculators.

I cannot see this is use of greenbelt except in very special circumstances. GBC make an exception for limited infilling outside the identified settlement boundaries where it can be can be demonstrated that the site should be considered to be within the village. This will be a catch all statement and is subjective causing complete uncertainty. Virtually any land on the the increasing edges of the village can be picked off by developers and is opportunities for speculators at the expense of villagers.

A figure published by Barton Wilmore Consultancy says the correct figure is 431 houses per year.

The data from the Office of National Statistics regarding population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year. I trust the Inspector and GBC will reduce the housing need to reflect the latest figures, especially in our already very congested village of Send.

Attached documents:

Comment: MM13 - LPMM18/3290  Respondent: Barry Lewis 11556161  Agent: 

MM13

There is too much allocation for retail in the town centre, recent collapses of high street chains demonstrates the changing shopping model and GBC’s proposals are totally at odds with the needs and market conditions which prevail.

Attached documents:

Comment: MM2 - LPMM18/3288  Respondent: Barry Lewis 11556161  Agent: 

RESPONSE TO GBC LOCAL PLAN REVISIONS

I wish to OBJECT to the local plan changes for the following reasons:-

MM2

The housing target is wrong and additional research needs undertaking so the latest ONS figures and household projections can be taken into account. The figure appears to be nearer 300 than the 670 GBC state.

There should be no requirement for GBC to take WBC unmet need. GBC has not followed its own strategy that requires development of Brownfield urban sites before developing in villages or the Green Belt.

I have detailed where 500- residential units CAN BE BUILT ON URBAN BROWNFIELD SITES WITHIN GUILDFORD yet GBC chose not to discuss these proposals which would be for first time buyers and those on the housing list (via a not-for-profit vehicle).

Attached documents:
Comment: MM23 - LPMM18/3293  Respondent: Barry Lewis 11556161  Agent:

MM23

Watering down the requirement for walking and cycling routes; the proposed SMC Routes have no funding allocation by GBC so even their aspirations are just that, aspirations and not practical proposals?

Attached documents:

Comment: MM3 - LPMM18/3295  Respondent: Barry Lewis 11556161  Agent:

S3

Does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/3298  Respondent: Barry Lewis 11556161  Agent:

A35 Wisley

With further work this site could be developed (as Dunsfold) but currently J10 delays and other infrastructure failings (local roads, rail and pedestrian/cycle) need addressing before this site can be developed. In principle a developable “new town” site but with all the necessary infrastructure upgrades BEFORE building works commence.

Attached documents:

Comment: MM41 - LPMM18/3292  Respondent: Barry Lewis 11556161  Agent:

MM14

Delays with J10 (M25) will impact on all developments within the borough. A3 road improvements; these proposals are outside GBC control and no reliance can be placed (by GBC) on these aspirations which have no funding allocation or timescales.

Attached documents:

Comment: MM9 - LPMM18/3289  Respondent: Barry Lewis 11556161  Agent:
Infilling within villages (disproportionately to the east of the Borough) will weaken the protection of the Countryside.

**Comment:** Other comments - LPMM18/3297  **Respondent:** Barry Lewis 11556161  **Agent:** Site specific

Proposals within the Horsley’s and other village sites

I have brought to GBC attention a number of windfall Brownfield development sites within the town centre, which could yield 500+ residential units. GBC needs to develop those sites prior to taking infill land within village site (mainly in the east of the borough) and including those within their plan.

Most of these sites are Green Belt sites; the Green Belt should remain to serve its intended purpose.

**Comment:** MM41 - LPMM18/6010  **Respondent:** Debra Hurdle 11941665  **Agent:** MM41 POLICY A43 Land at Garlicks Arch, Send Marsh

I object – There is a very severe concern that the additional houses proposed for this site, will put a further burden on the Medical Centre and Primary School where there is very little space to expand their facilities.

The increase in vehicles would undoubtedly have a great impact on the already congested road network.

**Comment:** MM42 - LPMM18/6013  **Respondent:** Debra Hurdle 11941665  **Agent:** MM42 POLICY A58 Land around Burnt Common Warehouse, London Road

Again with all the new houses proposed on this site, there will be further pressure on existing services in Send and the already congested junctions at either end of Send Marsh Road to access the main roads through Send.
I object – There is a concern about the increase in the minimum floor space at Burnt Common Warehouse making the industrial allocation ‘open-ended’ on this site.

The access and exiting of the site at the London Road and A3 slip road junction is already very dangerous and further vehicles coming on and off the site would increase the problem.

There is also a very busy main road through Send, very congested at peak times and the additional large HGVs are very likely to cause further problems on this road.

Attached documents:

Comment: MM44 - LPMM18/6012  Respondent: Debra Hurdle 11941665  Agent:

MM44 POLICY A63 Land West Of Aldertons Farm, Send Marsh Road, Send

I object – This site was not included in the current Local Plan as it was removed after the 2014 draft of the plan. With a tendency to extreme flooding but also a natural open area in the Green Belt and wildlife corridor it is questioned whether this site has not already been considered unsuitable for development?

Attached documents:

Comment: MM2 - LPMM18/5693  Respondent: Celia Howells 12039777  Agent:

Local Plan: Consultation on Modifications

I refer to the proposed modifications to the Local Plan recently published by Guildford Borough Council and have the following concerns which I would ask the Council/Planning Inspector to address before taking the Plan further.

Policy MM2

The housing need is stated to be 630 dwellings per annum for Guildford with a further 42 per annum to take up the shortfall from the plans put in Woking Borough Council. My understanding is that the figure for Guildford exceeds the figures which would be derived from the latest data from the Office for National Statistics and the new Government formula. In particular, it overstates the number of homes required for the student population and inflates the housing requirement by assuming a pessimistic rate of local economic engagement by residents.

Neil MacDonald, the expert advising Guildford Residents Association, has demonstrated that about 360 homes a year would support the economic growth rate proposed by the Inspector.

I am concerned that the Council, and/or the Inspector, use the most up-to-date data as the basis for the Local Plan and consider Neil MacDonald’s conclusions very carefully before finalising the plan. A lower housing need could lead to at least one of the Green Belt areas being preserved to improve the quality of life for of all those who live and/or work in Guildford.

It also seems perverse for Guildford to take up the slack in Woking’s Local Plan, when it results in Guildford sacrificing Green Belt land to housing development from out of area. I would also question whether Woking’s needs have been re-assessed (as Guildford’s should be) to determine whether their housing needs are still as they were when their plan was submitted.
Policy MM35

If the housing need is reduced as proposed under my comments in MM2 above, there is arguably no need for a development at Gosden Hill at all. The visually welcoming Green Belt land on the Northern entrance to Guildford would therefore be preserved.

In the event that the Gosden Hill Green Belt land is surrendered to development I remain concerned about the proposed access to the new development. In particular the phrase ‘Deliberative process of consideration to be undertaken as part of the development management process…’ is horrendously vague and/or meaningless. Before any development is permitted, the developer and/or Surrey Highways must have agreed to construct a new four way access road from the A3 to the site to be completed at the same time as any first phase development. Any development there is otherwise unsustainable. It would also be a missed opportunity to improve the road infrastructure to the North of Guildford and improve traffic safety on the A3.

Attached documents:

Comment: MM39 - LPMM18/5114 Respondent: David Arscott 12056033 Agent:

I am a Godalming resident and would like to comment on MM39, Policy A61: Land at Aaron’s Hill, Godalming.

This land should not be taken out of the Green Belt for the following reasons:

1. The site will be subjected to intense residential development, as proposed by Ashill Land Ltd for 200 houses, which is unsustainable in terms of:
   - loss of rural heritage;
   - erosion of urban edge;
   - extensive loss of natural habitats to local biodiversity, including endangered species;
   - impact on already heavily trafficked local roads;
   - creation of air, noise and light pollution on an elevated part of western Godalming.
2. The character of Godalming is defined by a cluster of distinct communities separated by green space; the use of this site and its adjoining site within Waverley Borough Council's domain, will erode this distinction.

The stated Requirements are inadequate to mitigate these impacts, and the stated Opportunities are meaningless.

With regard to traffic, the attached photograph shows the junction at the bottom of Eashing Lane with the A3100 Portsmouth Road at 08:40 on 11th October 2018. This is an extract from video footage taken by me. There was extensive queuing up Eashing Lane, with traffic also attempting to enter Eashing Lane from the A3100. Students and other pedestrians were having to negotiate this junction from the bus stop at the south of the junction. This, apparently, was a 'good' day for traffic flow. I work with someone who often has to negotiate Eashing Lane and the A3100 early in the morning in order to get into Godalming. There are times when it can take 40 minutes to get from the A3 at Lower Eashing to Godalming. The existing road infrastructure is incapable of safely and conveniently supporting the 462 houses planned for Aarons Hill.

see attachment for photographs mentioned.
Introduction

These representations will comment solely on amendments made to the 2017 submission version Guildford Borough Local Plan: Strategy and Sites (SVLP) as 2018 Main Modifications (MMLP) following the examination hearing sessions.

Policy S2 – Spatial Development Strategy (MM2 Housing Target)

The SVLP contained a housing target of 12,426 dwellings over a 19 year Plan period (2015-34) equating to 654 dpa excluding any Duty to Cooperate figures. The MMLP reduces the housing target for Guildford Borough to 630 dpa. The overall housing target contained within the Plan does however undergo a marginal overall increase to 12,600 dwellings, when unmet housing need of 42 dpa originating from Woking Borough is taken into consideration.

The Guildford Borough OAN figure of 630 dpa arose following the conclusions of the Inspector regarding OAN within examination document ref. ID/6. We have the following comments regarding the inputs to this 630 dpa figure:

Demographic Starting Point – At the outset of the examination hearing sessions, the Council published a paper entitled ‘Implications of 2016-based SNPP for Guildford’ (ref. LPSS-004). This set out the differences in estimated household needs associated with the 2016-based SNPP compared within their 2014-based predecessor. The ‘West Surrey Strategic Housing Market Assessment Addendum Report’ (2017), which was based on the 2014 SNPP, informed the SVLP.

The 2016-based SNPP paper concluded in Table 5 that estimated housing need – being the ‘demographic starting point’ - in Guildford Borough associated with the 2014 set equated to 557 dpa which reduced significantly when compared with the 2016 set to 422 dpa (annual difference of 135 dpa). There is clearly a significant difference between the two sets of SNPP data across the 19 year Plan period equating to a reduction of 2,565 dwellings. The application of the 2016-based SNPP figure appeared to be indorsed by the Inspector in ref. ID/6 with para. 5 stating that “together, these point towards an OAN of 630 dpa. This represents a considerable uplift over the demographic starting point of 422 dpa”. The demographic starting point contained within the 2017 SHMA addendum was 552 dpa.

Whilst the ‘Implications of 2016-based SNPP for Guildford’ paper made some informed assumptions regarding the translation of the 2016-based SNPP into household growth and housing need, we note that following the publication of the 2016-based household projections, the Inspector has wrote to the Council to ask them to “comment on the latest version of the Household Projections and their implication for OAN” (ref. ID/10).

It is also important that the Inspector makes the Council aware that the ONS intends to publish an alternative version of the 2016-based household projections on 3rd December 2018. This is explained at the following link - https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/methodologyusedtoproducehouseholdprojectionsforengland2016based/#household-representative-rates.

The ONS explain that on 2nd December 2018 they will publish a set of variant 2016-based household projections in which household formation rates for younger adults (those aged 25 to 44 years) are higher. The purpose of this variant would be to illustrate the uncertainty in the projections around the future household formation patterns of this age group. It is a response by the ONS to concerns raised regarding the revised methodological approach of establishing the 2016-based set which, unlike the 2014-based projections, which incorporated data from as far back as the 1971 census, are compiled with statistics that only go back to 2001. This change in methodology is particularly telling for Authorities such as Guildford who, due to ‘policy on’ constraints to development such as Green Belt, have seen housing delivery
suppressed, with annual housing completions over the decade 07/08 to 16/17 only exceeding 300 dpa on two occasions being 07/08 and 15/16 (2017 AMR, Table 1).

The 2016-based variant is a response by the ONS to justified concerns that the new methodology, by only going back to 2001, effectively ‘bakes in’ the adverse consequences to household formation, which is manifested in the age-group 25-44, of housing under-delivery during this period. The Inspector should therefore await the publication of the 2016-based variant and consider its implications for Guildford and whether a demographic starting point of 422 dpa is appropriate or robust. It is notable that the ‘Implications of 2016-based SNPP for Guildford’ paper suggests at table 2 that if an uplift is made to take account of higher household formation rates, the demographic starting point would increase from 422 to 475 (n.b. this adjustment considers only the 25-34 age bracket and it is reasonable to assume that if the ONS bracket of 25-44 is used instead, it would push the figure even closer to the original 2014-based demographic starting point of 552 dpa).

Dandara Ltd consider that given the low levels of housing delivery experienced in Guildford Borough over the past decade, averaging only 258 dpa, which is a result of ‘policy on’ constraints to growth, rather than lack of demand or developer appetite, the Inspector should give considerable weight to the ONS 2016-based household projection variant which is being published specifically for areas which will have experienced artificially supressed household formation rates since 2001. Regardless of which iteration of the 2016-based projections the Council utilises, it is imperative that these are used to update the 2015 SHMA as a core evidence base document, applying a consistent methodological approach, rather than being considered in isolation.

Economic Uplift

Dandara Ltd supports the conclusion of the Inspector at para. 3 of ID/6 that “the SHMA Addendum growth assumption of 0.7% pa thus appears on the low side and I consider that a realistic and cautious approach would be to assume employment growth of 0.8% pa – lower than past trends and indeed lower than the highest of the economic forecasts, but higher than the blended average of the forecasts”. This uplift should be applied to the 2016-based household projection variant when published in December as part of a comprehensive update to the SHMA.

Student Numbers

Dandara Ltd supports the conclusion of the Inspector at para. 4 of ID/6 that “as regards student numbers, it is predicted that 23 dpa is required to compensate for added for predicted further incursion of students into the housing market”. Again, this uplift, alongside that to support economic growth, should be applied to the 2016-based household projection variant as part of a comprehensive update to the SHMA.

Market Signals

There was broad consensus during the examination hearing sessions that Guildford experiences one of the most challenging median workplace-based affordability ratios in the country. This is borne out both over the long-term, increasing from 4.83 in 1997 to 12.53 in 2017, and looking at relatively sharp increases over the shorter term, from 9.59 in 2012 to 12.53 in 2017. There is thus a demonstrable pattern of worsening affordability in Guildford over the long and short term.

The Council has recognised, within para. 29 of LPSS-010 that if one were to apply the standard methodology to the demographic starting point, then the 40% cap would automatically apply given that the overall uplift would be 53%. Whilst the Guildford Local Plan is not being examined under the auspices of the 2018 NPPF, it nevertheless provides an important steer regarding the direction of Government policy in applying a capped 40% adjustment to the demographic starting point where appropriate to address affordability.

The view of the Council however is that uplift applied to the demographic starting point to support economic growth subsumes an increase for market signals and effectively addresses both potential adjustments. The Inspector is aware of competing opinions on this matter put forward during the hearing sessions and we will not look to add to this debate other than to refer to updated Planning Practice Guidance on ‘Housing Need Assessment’. This explains the practical application of the standard method which comprises establishing the demographic starting point and then applying an adjustment to take account of affordability that may be capped.
Affordability is therefore central to Government policy with the PPG explaining that “the affordability adjustment, at the level proposed, is applied in order to start to address the affordability of homes, and is intended to slow down the rate at which local affordability ratios are increasing” (para: 006, Ref. ID: 2a-006-20180913). This is not a new policy approach with the 2012 NPPF looking to boost housing delivery in para. 47 albeit the specific focus on readjusting affordability ratios provides more detail to the practical application.

What the PPG does tell us is that there will be occasions when a higher housing figure than the standard method needs to be considered (para: 010, ref ID: 2a-010-20180913). Note the use of the word ‘needs to be considered’ rather than ‘should be considered’. The PPG provides various examples which includes, “where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth”.

The Inspector will be aware from the hearing sessions of various reports which look at the level of housing growth needed to achieve a betterment in affordability ratios. Given the thrust of Government policy regarding improvements to affordability, and the specific application of median workplace-based affordability ratios under the standard method, it is imperative that the Inspector satisfies himself that if any adjustment to the demographic starting point to address affordability is subsumed within an adjustment made to support economic growth, that such an adjustment would have a positive impact on narrowing the existing chasm between house prices and earnings in Guildford.

The Inspector has suggested within ref. ID/6 that “the appropriate approach is to base adjustments on known factors and monitor market signals, and if affordability trends continue to worsen, take appropriate steps in the next plan review”. It is questionable whether this approach, which looks to avoid a worsening of affordability ratios rather than seeking to support a Plan which positively improves the differential, it in line with Government policy. At the very least, the Inspector should satisfy himself that the final housing target included in the Plan is accompanied by evidence that demonstrates that such a figure would at the very least ‘peg’ affordability ratios at 2017 levels. Such work has not been undertaken by the Council and indeed such evidence from participants suggests a target of between 800 dpa and in excess of 1,000 dpa would be required simply to avoid a worsening in affordability ratios (see REP-8944737-002 as an example).

The Inspector in ID/6 stated that “… the higher figures represented by these approaches [to improve affordability ratios] would result in an OAN a long way in excess of the reduced demographic starting point and they need to be treated with a degree of caution”. Whilst we agree with the sentiment, no evidence has been provided to demonstrate that an additional uplift to the demographic starting point to improve affordability would result in deliverability concerns. It is also notable that Option 8 of the SA assessed the sustainability implications of an OAN over 800 dpa and concluded it was deliverable without unacceptable harm resulting.

Affordable Housing

The SHMA addendum at para. 5.20 identifies 517 households per annum who require support in meeting their housing needs which, with 40% affordable housing delivery, would notionally require a housing target of 1,293 dpa to meet affordable housing need in full. This is a further indicator that a positive upward adjustment to the demographic starting point is required to positively address affordable housing need unless evidence can be provided that this cannot sustainably be achieved including market demand.

Policy S2 Spatial Development Strategy Conclusion (MM2 Housing Target)

These representations recommend that the Inspector considers the implications of the variant 2016- based household projections, due to be published by the ONS in December 2018, upon the housing target for Guildford Borough. These variants are directly relevant to Guildford, having been produced in response to justified criticism that the new methodology applied to the 2016-base projections, which go back to only the 2001 census, will have ‘built in’ periods where housing delivery has been supressed, with knock-on implications to the ability of new households to form. It is considered that the variant 2016-based household projections should represent the demographic starting point for Guildford assuming they form part of a full SHMA update consistent with the methodology applied within the 2015 SHMA and latter addendum.
This demographic starting point should then apply an uplift to support economic growth and the student population recommended within the Inspector’s note ID/6. It is however considered fundamental, given the clear emphasis of Government policy to improve affordability having specific regard to affordability ratios, that if any uplift to improve chronic affordability within Guildford is subsumed within the economic uplift, that evidence is provided to demonstrate that over the Plan period, the 2017 median affordability ratio for the Borough will reduce or will at least be ‘pegged’ from 12.53. As it stands, the Inspector does not have evidence in front of him to satisfy himself that this is the case with much evidence to the contrary suggesting that the housing target established within Policy S2 of the MMLP would result in a significant worsening in affordability ratios, even at inflated 2017 levels, with knock-on implications to household formation, homelessness and overcrowding.

Policy S2 – Spatial Development Strategy (MM2 Unmet Need)

Dandara Ltd supports the principle of the Local Plan including an allowance of 42 dpa to address unmet need arising from Woking Borough and as set out in the Inspector’s document ID/6.

Policy S2 – Spatial Development Strategy (MM2 Stepped Trajectory)

Dandara Ltd supports the deletion of the stepped trajectory formerly included within Policy S2. The rationale for the deletion of the stepped trajectory approach given by the Inspector at para. 14 of ID/6 is endorsed.

Para. 4.1.10 – Approach to Calculating Five Year Housing Land Supply (MM2)

Para. 4.1.10 of the MMLP explains that following the deletion of the stepped trajectory, the five year housing land supply will be aggregated across the Plan period, with an increase from 2019 to take into account unmet need arising from Woking Borough. Notwithstanding concerns regarding the overall housing target set out in Policy S2 which is the basis for calculating five year supply, this approach is supported. Dandara Ltd also supports the recognition within para. 4.1.9b that the application of a 20% buffer is appropriate given Guildford’s persistent record of under-delivery of housing.

Dandara Ltd fundamentally objects to the use of the ‘Liverpool’ methodology to address historic housing delivery shortfall and disagrees with the conclusion of the Inspector in para. 14 of document ref. ID/6 that “I am prepared to accept that the Liverpool methodology on its own is valid, given the scale of the strategic allocations and the infrastructure issues associated with them”. This conclusion is not in accordance with national policy as set out within PPG:

“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach). If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.

Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make” (para: 044, ref ID: 3-044-20180913).

Whilst the PPG recognises that there is an opportunity associated with Plan making for Local Authorities to deal with past under-delivery through the ‘Liverpool’ approach, this must be considered in the context of an overriding preference for the use of the ‘Sedgefield’ approach unless this is not able to reinstate a five year supply due to the scale of the shortfall.

As we will go on to discuss, the MMLP has introduced five new housing allocations, three of which are located within ‘high sensitivity Green Belt’. This is considered to represent a significant shift in the Council’s policy to selecting housing sites which previously rejected all land located within high sensitivity Green Belt regardless of whether the site was identified as a potential development area (PDA) within the Green Belt and Countryside Study (GBCS).

These representations will go on to explain that the decision of the Council to allocate land for housing falling within high sensitivity Green Belt introduces the potential for a material number of small and medium scale sites, which were previously rejected for allocation solely for falling within high sensitivity Green Belt, to be considered for housing. To
ensure that the site selection process is consistent and transparent, it is imperative that the Council revisit all sites previously rejected due to falling within high sensitivity Green Belt, especially if previously identified as PDAs.

Looking specifically at five year housing land supply, by accepting that high sensitivity Green Belt is no longer a finite constraint for land accommodating new housing, the Council must commit itself to reassessing all previously rejected high sensitivity Green Belt sites which would undoubtedly identify other sources of housing supply which could contribute to making-up past delivery shortfall within the first five years as per ‘Sedgefield’. This fundamental shift in approach to considering high sensitivity Green Belt parcels for development means that the Inspector cannot be satisfied that the Council is unable to accommodate past under-delivery within the first five years, especially given the provisions of the PPG which suggests very clearly that it is for an Authority to demonstrate that it is the scale of the under-delivery that prevents a five year supply being reinstated applying ‘Sedgefield’. The Council has fundamentally failed to demonstrate this.

Appendix 0 – Housing Trajectory (MM46)

Notwithstanding our concerns regarding the Policy S2 housing target, we have had regard to the housing trajectory set out within Appendix 0 of the MMLP in the context of the justification for applying the ‘Liverpool’ methodology to historic under-delivery and the availability of additional land previously excluded due to falling within high sensitivity Green Belt.

Over the first four pre-adoption years of the Plan period, a total of 1,264 dwellings were delivered (2015-19). This represents a shortfall of – 1,256 against the MMLP Policy S2 housing target of 630 dpa (630 x 4 = 2,520 – 1,264). Over the next five year period (2019-24) the trajectory shows the delivery of 4,974 new homes. The annual housing target from 2019 equates to 672 dpa giving a total target of 3,360 over the five year period which increases to 4,032 adding the 20% buffer (630 + 42 unmet need x 5 x 1.2).

If Guildford were to deliver their – 1,256 shortfall over the next five year period as required by PPG, they would need to deliver the following:

Baseline Target = 672 x 5 = 3,360;

Baseline plus Under-Delivery = 3,360 + 1,256 = 4,616 Baseline plus Under-Delivery plus 20% = 5,539.

The trajectory shows total supply over the period 2019-24 of 4,974 which is only - 565 dwellings short of reinstating a five year housing land supply applying ‘Sedgefield’. Given that the Council responded to the Inspector’s ID/6 note on OAN and five year supply on 27th June 2018, being only five days following the issuing of ID/6, setting out five additional sources of housing supply, three of which were on high sensitivity Green Belt, it is difficult to conclude that additional sources of supply could not be found. Put simply, if the Council identified 805 new homes in only five days, imagine what could be achieved if they undertook a proper, considered and consistent assessment of sites previously rejected due to falling within high sensitivity Green Belt.

The Inspector simply cannot be satisfied that the Council is unable to reinstate a five year housing land supply applying the Sedgefield methodology as required by PPG. This is for the following principal reasons:

• Applying the housing target within Policy S2, the shortfall is only -565 dwellings;
• In response to the Inspector’s note ID/6, the Council identified additional sites to accommodate a further 805 homes within five days of receipt;
• Three of these sites, delivering 385 new homes, are located on high sensitivity Green Belt which was previously considered a finite constraint and is thus a ‘game changer’ in respect of the Council identifying additional sources of housing land, especially those identified as PDAs within the GBCS;
• The Council has not sought to revisit their site selection process for land previously rejected due to falling within higher sensitivity Green Belt;

...
We know for sites such as that being promoted by Dandara Ltd on land off Shere Road, West Horsley, which is medium scale and available within the next five years, that the only reason for rejection related to it falling within higher sensitivity Green Belt which is no longer a finite constraint by the MMLP.

The Inspector cannot therefore be satisfied that historic under-supply cannot be addressed within the first five years of the Plan period post adoption as required by PPG and should request, as a minimum, that the Council undertakes a review of all potential housing sites previously rejected solely due to falling within higher sensitivity Green Belt which is no longer treated as a finite constraint by the MMLP.

**Main Modifications Local Plan Part 2: Sites (MM39, MM43, MM44, MM45)**

Part 2 ‘Sites’ of the MMLP proposes to introduce five additional sources of housing supply alongside increasing capacity on two existing allocations. The purpose of these additional sources of housing supply is to allow the Council to reinstate a five year housing land supply on adoption of the Plan following the deletion at MMLP stage of the Policy S2 stepped trajectory as recommended by the Inspector – albeit applying the ‘Liverpool’ methodology. These representations specifically focus on the introduction of four additional Greenfield sites (n.b. Dandara Ltd’s omission site off Shere Road, West Horsley is included for comparison purposes).

<table>
<thead>
<tr>
<th>Site</th>
<th>Housing Number</th>
<th>Green Belt Sensitivity</th>
<th>GBCS PDA</th>
<th>GBCS Sustainability Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aaron’s Hill, Godalming</td>
<td>200</td>
<td>High (Parcel F18)</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>Hornhatch Farm, Chilworth</td>
<td>80</td>
<td>High (Parcel E51)</td>
<td>Yes (E51B)</td>
<td>9.75 / 7</td>
</tr>
<tr>
<td>West of Alderton’s Farm, Send</td>
<td>120</td>
<td>Medium (B15)</td>
<td>Yes (B15C)</td>
<td>7 / 4</td>
</tr>
<tr>
<td>Glaziers Lane, Flexford</td>
<td>105</td>
<td>High (Parcel H10)</td>
<td>Yes (H10B)</td>
<td>6 / 0</td>
</tr>
<tr>
<td>Dandara Ltd Omission Site, Shere Road, West Horsley</td>
<td>Not Proposed for Allocation</td>
<td>High (Parcel E4)</td>
<td>Yes (E4B)</td>
<td>7.25 / 9</td>
</tr>
</tbody>
</table>

There are three particularly important themes to draw from the above schedule:

**High Sensitivity Green Belt** - The SVLP proposed no sites for housing allocation that fell within
‘higher sensitivity’ Green Belt as identified within the GBCS. This approach was explained at para. 4.123 of the December 2017 ‘Housing Delivery’ Topic Paper, “as a starting position we have sought to protect land which has been assessed as high sensitivity Green Belt. We therefore consider it appropriate to exclude in the first instance any sites that fall within a red (high sensitivity) land parcel” (LPSS-SD-TP-004). The MMLP now proposes for allocation three sites which are located within ‘high sensitivity’ Green Belt, delivering a total of 385 homes;

**Potential Development Areas** – The GBCS identifies a series of ‘potential development areas’ (PDAs) which “…are identified on the basis that, should exceptional circumstances warrant amending the Green Belt boundary in order to accommodate growth that could not be suitably provided elsewhere, development here would not harm the main purposes of the Green Belt” (December 2017, ‘Green Belt and the Countryside’ Topic Paper, para. 4.13). The MMLP departs from the SVLP by proposing

for allocation land at Aaron’s Hill, Godalming which was not identified as a PDA within the GBCS. This is despite the GBCS assessing the parcel within which the land sits, parcel F18 but then taking the informed decision, consistent with the methodological approach across the Borough’s Green Belt, not to identify a PDA;

**Sustainability** – An important component of the methodology underpinning the GBCS was to consider the sustainability credentials of PDAs alongside the contribution that the land made to Green Belt purposes. The final column in the table above reproduces the GBCS sustainability score for each PDA. The first score covers overall sustainability in respect of accessibility to shops, services and public transport modes with the second score covering sustainability in specific respect of access to recreational facilities. Generally, the higher the score the more sustainable the PDA.

It is helpful to revisit the original Land Availability Assessment (2016) which accompanied the SVLP as a core evidence base document. The reasons given by the Council for the exclusion of all sites, with the exception of Alderton’s Farm, Send which is located within ‘medium sensitivity’ Green Belt, is that the sites fell within ‘high sensitivity’ Green Belt parcels. This reason for rejection is consistent with the extract reproduced above from para. 4.123 of the December 2017 ‘Housing Delivery’ Topic Paper.

<table>
<thead>
<tr>
<th>Site</th>
<th>LAA Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aaron’s Hill, Godalming</td>
<td>Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in Waverley Borough Council’s Green Belt review but is located within high sensitivity Green Belt.</td>
</tr>
<tr>
<td>Hornhatch Farm, Chilworth</td>
<td>Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.</td>
</tr>
<tr>
<td>West of Alderton’s Farm, Send</td>
<td>Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within medium sensitivity Green Belt.</td>
</tr>
<tr>
<td>Site</td>
<td>GBCS Assessment</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Glaziers Lane, Flexford</td>
<td>Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.</td>
</tr>
<tr>
<td>Dandara Ltd Omission Site, Shere Road, West Horsley</td>
<td>Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.</td>
</tr>
</tbody>
</table>

Likewise, it is helpful to revisit the PDA assessment for each site contained within the original GBCS which accompanied the SVLP with the exception of Aaron’s Hill, Godalming which was not identified as a PDA.

<table>
<thead>
<tr>
<th>Site</th>
<th>GBCS Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aaron’s Hill, Godalming</td>
<td>Not identified as PDA.</td>
</tr>
<tr>
<td>Hornhatch Farm, Chilworth</td>
<td>E51-B is surrounded by defensible boundaries including hedgerows following the New Road to the north and west, hedgerows and tree belts located near Tillingbourne School to the east, and woodland at Wonersh Common to the south of the PDA.</td>
</tr>
<tr>
<td>West of Alderton’s Farm, Send</td>
<td>B15-C is surrounded by defensible boundaries including substantial hedgerows following Send Marsh Road to the north, tree cover and residential gardens following Green Drive to the east, a substantial tree belt following Broughton Hall Drive to the south, and tree cover separating Broughton Hall to the west of the PDA.</td>
</tr>
<tr>
<td>Glaziers Lane, Flexford</td>
<td>H10-B is surrounded by defensible boundaries including hedgerows and residential gardens near Glaziers Lane to the north and west, a substantial tree belt within open farmland to the east, and tree belts following the railway line to the south of the PDA.</td>
</tr>
<tr>
<td>Dandara Ltd Omission Site, Shere Road, West Horsley</td>
<td>E4-B is surrounded by defensible boundaries including hedgerows and tree cover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east, rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA.</td>
</tr>
</tbody>
</table>
Whilst Dandara Ltd disagreed with the approach, the SVLP was at least consistent in not proposing for allocation any sites falling within ‘high sensitivity’ Green Belt parcels, regardless of whether they were originally identified as PDAs within the GBCS. The MMLP departs from this site selection process by allocating three sites for housing, delivering 385 homes, which fall within ‘high sensitivity’ Green Belt.

This approach is unsound, failing the ‘justified’ test, as it cannot be demonstrated that the additional housing sites introduced within the MMLP represent the most appropriate strategy, when considered against the reasonable alternatives. Taking Dandara Ltd’s omission site off Shere Road, West Horsley as an example, the selection of the additional MMLP housing sites is considered unjustified and unevidenced having regard to the evidence base underpinning the SVLP.

Land off Shere Road, West Horsley, as set out within the LAA extract reproduced above, was only discounted for allocation due to falling within ‘high sensitivity’ Green Belt. The LAA assessment for the site was identical to the four Greenfield MMLP proposed housing sites. The Council has provided absolutely no justification to explain why they did not revisit all PDAs previously excluded due to falling within ‘high sensitivity’ Green Belt for consideration for allocation required to address housing trajectory concerns raised by the Inspector. Instead, within five days of receipt of the Inspector’s letter ID/6, the Council had proposed for allocation the MM additional Greenfield sites with no attempt to consider whether they represented the most appropriate PDAs for allocation having regard to the evidence base as a whole.

Taking sustainability as an example, the whole purpose of the GBCS including an objective assessment of the sustainability credentials accruing to each PDA was to allow the Council to take into consideration the overriding NPPF objective of promoting sustainable patterns of development associated with Green Belt release. However, as can be seen from the schedule above, land off Shere Road, West Horsley has a higher core sustainability score than both Alderton’s Farm and Glaziers Lane and outperforms all sites when considering access to recreational facilities. It is therefore an inherently sustainable site which out-performs at least two of the proposed MMLP allocations.

Fundamentally, if the Council is to make the decision to no longer treat land identified as ‘high sensitivity’ Green Belt as a finite constraint, they should reconsider for development all PDAs previously excluded from consideration due to falling within ‘high sensitivity’ Green Belt. Taking land off Shere Road, West Horsley as an example, a site which was only excluded from the Local Plan site selection process due to falling within ‘high sensitivity’ Green Belt, it is imperative that this land is reassessed on a level playing field, especially given the fact that the MMLP is proposing for allocation one site not even identified as a PDA within the GBCS (Aron’s Hill) and at least two that performed worse from a sustainability perspective (Alderton’s Farm and Glaziers Lane).

**Conclusion**

It is considered that the MMLP is required to identify additional sources of housing supply in order to reinstate a five year land supply applying the ‘Sedgefield’ methodology as required by PPG and taking into account upcoming ONS variant 2016-based household projections which are particularly applicable to Authorities such as Guildford where household formation has been suppressed since 2001 due to ‘policy on’ factors. In addition, the Inspector within ID/6 cannot be satisfied that the Policy S2 housing target is able to engender a meaningful improvement to affordability ratios, the betterment of which are a key Government objective enshrined within the standard method. There is at present no evidence in front of the Inspector that demonstrates that 630 dpa would act to reduce, or even ‘pin’, the unsustainable affordability ratio of 12.53 experienced across the Borough.

The Council has made an initially positive move from the SVLP by recognising that ‘high sensitivity’ Green Belt parcels do not represent a finite constraint to development where they contain PDAs identified within the GBCS. However, it is important that the Council recognises that there are a range of sites that were only excluded from the Local Plan site selection process due to falling within ‘high sensitivity’ Green Belt. It is imperative therefore that the Council revisits all PDAs previously ruled-out as ‘high sensitivity’ Green Belt in a transparent, consistent and open manner, especially where the comparison exercise undertaken above suggests that there are more sustainable PDAs available than those now included within the MMLP, taking into account the sustainability evidence included in the GBCS.

If the Council were able to identify four additional Greenfield sites within five days of receipt of ID/6, the Inspector must ask himself whether he can possibly be satisfied that the Council has undertaken a sound, robust assessment of omission
sites in a consistent and transparent manner in order to meet full OAN, including meaningful improvements to affordability ratios, and to reinstate a five year housing land supply using the Sedgefield methodology as required by PPG. Dandara Ltd contend that the Council has failed to properly consider all omission sites previously excluded from consideration due to falling within ‘high sensitivity’ Green Belt and cannot demonstrate that those chosen represent the most appropriate strategy when compared against reasonable alternatives. By no longer considering ‘high sensitivity’ Green Belt as a finite constraint, the Council has made available a raft of PDAs which should all be reconsidered on an equitable basis to ensure that those allocations proposed within the MMs are the most appropriate from a Green Belt purpose, sustainability, infrastructure and delivery perspective.

Attached documents:

Comment: MM27 - LPMM18/747  Respondent: Michael Cumper 12129889  Agent:

The changes to the A3 junction have not taken into account the increased traffic and do not address the traffic issues for Send and Ripley for the proposed new developments in Send and the locality. There has been significant assessment of the route from Send to Woking which is already under considerable pressure. Vehicles will not just head to get to Woking but the use of Woking Station will increase dramatically and those people will be travelling through Send to get the train to London. This needs to be properly considered and it will result in the conclusion that the infrastructure just can't take it.

Attached documents:

Comment: MM41 - LPMM18/742  Respondent: Michael Cumper 12129889  Agent:

I object to this - This area is green belt and contains important trees. Villages should have distinct areas between them and this separates Send from Ripley. The roads north through Ripley and west toward Woking are already a nightmare at rush hour and this development will make it even worse. The infrastructure is just not in place for this. Before such developments can be considered there needs to be proof that the schools and doctors in the area are in a position to cope, which I doubt very much they are.

Attached documents:

Comment: MM42 - LPMM18/743  Respondent: Michael Cumper 12129889  Agent:

I object to this - This was deleted from a plan a few years ago and it should remain deleted. There is no need for this industrial area when Slyfield has capacity for expansion. This is green belt and there are no special circumstances to argue that the green belt should be encroached upon here. Given the employment land needs assessment showed a reception in demand for industrial land how can the reaction to that be to increase the supply?

Attached documents:

Comment: MM44 - LPMM18/744  Respondent: Michael Cumper 12129889  Agent:
I object to this - This is green belt and there are no special circumstances to enable an argument that this green belt land should be built on.

Attached documents:

**Comment**: MM9 - LPMM18/745  **Respondent**: Michael Cumper 12129889  **Agent**:

I object to 'limited infilling'. This is not grounds for special circumstances and green belt land should not be used other than where special circumstances can be demonstrated each time a development is considered. This would open up the probability for decisions to be hidden from the public and it is underhand. Local Government should ensure transparency and this goes against the theory of that.

Attached documents:

**Comment**: Other comments - LPMM18/1250  **Respondent**: Sara Scott 14135937  **Agent**:

I wish to object to the adoption of the Local Plan.

Having listened carefully to arguments and explanations of the likely outcome of its adoption, as opposed to the adoption of the Masterplan as proposed by GVG, I believe a piecemeal approach to town planning will continue into the future should it be used.

The infrastructure of the town has to come first. I have lived here all my life and am amazed to see the haphazard way work continues to be carried out in the town. Let’s stop, think and look to the long term.

Attached documents:

**Comment**: MM2 - LPMM18/3358  **Respondent**: Michael Forster 14177217  **Agent**:

The Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination

Attached documents:

**Comment**: MM3 - LPMM18/3361  **Respondent**: Michael Forster 14177217  **Agent**:

The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit
Comment: MM41 - LPMM18/3359  Respondent: Michael Forster 14177217  Agent:

There is too much reliance on A3 improvements and they are beyond the council’s control

Attached documents:

Comment: MM9 - LPMM18/3360  Respondent: Michael Forster 14177217  Agent:

The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Attached documents:

Comment: MM2 - LPMM18/2474  Respondent: Ian Macpherson 14177313  Agent:

OBJECTION  Amendment MM2

This is a reasoned objection by Ian Macpherson on the 2018 revisions to the 2017 draft Submission Local Plan.

My prime objection is over housing numbers [your Paragraph MM2]. Guildford now proposes 650 [or thereabouts] dwellings per year. I am told that expert calculations carried out on behalf of the GRA [Guildford Residents Associations] suggest an actual need of 360 homes per year. Consequently GRA, I am also told, is in process of challenging this amendment to the present draft.

Meanwhile the ONS has published its own estimates. The ONS figures of about 300 households a year [Household projections in England -2016 base]. are, given the guesswork in any forward estimating, much the same as GRA. Effectively ONS provides updated figures for the Government's Standard Method.

It is understood that the Government is in process of reconsidering the calculation of the Standard Method and will publish consultations 'after Christmas', which, even in draft, could provide a baseline.

Meanwhile, a substantial discrepancy

The National Policy position at the moment, as I understand it, is that Planning Authorities should hold to previous calculations where a draft Plan has been submitted.

However this is untenable in common sense [and probably in law] where there is a discrepancy as large as seems to be the case here, and where the consequences involve removal of substantial and important areas of land from the Green Belt.

The exemplar of this is the proposal for Gosden Hill Farm. Gosden Hill is not 'rubbish' Green Belt - instead [NPPF 2018 para 170] it is central to a 'valued landscape' - that is, the view from the much travelled A3 across to the North Downs.
There can be few landscapes of this kind that are viewed by more people. To alienate this does indeed require 'exceptional circumstances'.

Legally, Ministers and other Authorities are nowadays be obliged to show reasons, and this would be tricky given the doubts over the housing figures that provide the 'exceptional circumstances'. They are simply 'not sound' at the moment.

I suggest that the Council must, in the circumstances, ask the Inspector to re-convene the Examination into the Plan, so that this central matter can be thrashed out and agreed in public.

It would be sensible to re-convene after the Government has published at least a first draft of the revised methodology.

Attached documents:

Comment: MM2 - LPMM18/4398  Respondent: Brian Scammell 14180449  Agent:

4. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination.

Attached documents:

Comment: MM3 - LPMM18/4395  Respondent: Brian Scammell 14180449  Agent:

Guildford Borough Council's modifications still leave the Local Plan unsound because:

1. GBC has not properly observed its hierarchy of development. Opportunities for brownfield development, especially in the town centre, have not been fully exploited
2. The town centre policy, S3, is therefore inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM41 - LPMM18/4396  Respondent: Brian Scammell 14180449  Agent:

There is also too much reliance on A3 improvements, which are beyond the Council's control

Attached documents:

Comment: MM9 - LPMM18/4397  Respondent: Brian Scammell 14180449  Agent:

3. The grounds for green belt development are inadequate and do not represent 'exceptional circumstances'.

Attached documents:
I thank the GVG group for the spur for these comments (in the nick of time?). I support their enthusiasm but feel their imagination has run away with them. I have looked at the plans and would like to make my suggestions based on discussions with GBUG and others.

I think the GVG ideas are far too expensive and unlikely to be funded. I heartily support the work of GBUG.

Guildford is currently being throttled by town centre traffic and whilst A3 development may help to the north, traffic from the south will continue to need better access if the town is not to be crippled by its poor infrastructure.

Congestion is centred on the Bridge St area, and Onslow St needs to be cleared, separated from walkers and cyclists. If coordinated with an improved Friary site this can use the existing footbridge over Onslow St and subway under Millbrook. It is crazy (or at least completely unfeasible in current financial climates) to demolish the modern Friary roadbridge, which if fully used could carry 6 lanes. Few walk across it now and an extra river footbridge by the subway would not be expensive.

A high level network of paths across the valley would help link in the train and bus services. The towpath already helps provide this separation.

The effort should then be to improve the flow to each end of this, the main river bridge.

There are four key roads, the A31 and A322 from the north and the A281 and A3100 to the south. There will need to be light controlled access to the bridge but as far as possible no other delays to motor traffic.

This will help give access to the centre from all directions, and reduce pollution from the jams.

Attached documents:

Thank you for the email below. I have reviewed the consultation webpage and am excited by what I see generally. Regarding the Local Plan and the Main Modifications, I fully support what is being proposed and very much look forward to seeing this implemented. This all represents a huge improvement to Guildford town centre in particular and a very positive step forward for our lovely town.

I wish you every success in taking this forward.

Attached documents:

Submission Local Plan: Strategy and Sites - Main Modifications

Site A64 Land between Glaziers Lane and Strawberry Farm, Flexford Normandy Homes (C3) 105
I object to the proposed development of 105 houses on the above site. My reasons are stated below:

1. The land is included in the Green Belt
2. There are no exceptional circumstances to develop on this land
3. The area cannot cope with any more traffic
4. The infrastructure in the local area will be unable to cope with the extra demand, especially with drainage
5. There is a lot of natural wildlife and animals in the area that will be affected. Especially hedgehogs, deer, foxes and owls.
6. The bright lights at night will affect the local AONB's views

Attended documents:

**Comment: MM2 - LPMM18/4759  Respondent: Katherine Pyne  15057889   Agent:**

**POLICY S2**

- I object to the way the GBC uses the word ‘need’ in place of *demand* when promoting house building requirements in this area.
- I object that the figure for Guildford Borough housing need used by the Inspector was 789 per annum. This has been discredited as shown to be a high over-estimate and therefore is an unreliable and irrelevant basis on which to plan housing for the area.
- I object that GBC is using failing to acknowledge and amend their discredited figure of 789 per annum when Barton Willmore – a respected consultancy – has said that the correct figure should be 431.
- I object that GBC is not considering relevant data when proposing housing need and this will impact on and encourage excessive development in Send and destroy our village and its character.
- I object that GBC is proposing to amend its housing need by considering September data from the OFFICE FOR NATIONAL STATISTICS which suggests that appropriate growth for Guildford Borough can be achieved with 460 houses a year.
- I object that GBC fails to take into account publicly available data which proposes a much lower number of housing need for our borough and village and - in the face of sustained and numerous objections from residents - instead proposes numbers and developments which would only meet the neds of housebuilders and developers.

Attended documents:

**Comment: MM27 - LPMM18/4757  Respondent: Katherine Pyne  15057889   Agent:**

**MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY**

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attended documents:
RE: Objections to Guildford Borough Council (GBC) Local Plan – Consultation due to close on 23.10.2018.

I am writing in response to the latest version of the Local Plan as outline in GBC-LPSS-026. As in earlier versions of the plan, the modifications presented for Send are inappropriate, excessive and will be highly detrimental to our village, our quality of life and our future. These changes will result in irreversible destruction of our village.

The local plan in its current form illustrates the continued failure of GBC to provide a plan that is fit for purpose, supported by competent data made available in the public domain, which provides for the needs of current residents, and secures the best future for them and LISTENS TO LOCAL VOICES.

**MM41 LAND AT GARLICK’S ARCH, SEND MARCH, POLICY A43**

- I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide ‘exceptional circumstances’ to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
- I object that this development is proposed on Green Belt Land and will destroy countryside and ancient woodland.
- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
- I object to this development as it will ‘join up’ Send and Ripley and local character will be destroyed by this over development.
- I object to GBC ignoring the 7,000 previous objections raised by local residents with regard to developing this area.
- I object because the site is subject to frequent flooding, which will only worsen with increased buildings and ground coverage.
- I object because local schools and medical facilities will not be able to support the massive increase in demands resulting from this plan.
- I object because local infrastructure will not be able to support the additional demands of new residents.
- I object to GBC’s proposal to consider and adequately address infrastructure requirements when proposing an excessive, unnecessary and disproportionate increase in housing for Send and Send Marsh.
- I object because wildlife will be displaced.
- I object because the land is contaminated by lead shot and this will compound the problem of increased flooding and will be detrimental to health and well-being.
- I object to GBC increasing by 37% the number of houses in this development, which is excessive and not supported by need but demand and proposed to promote excessive and unnecessary housing development in this area to the benefit of housing developers but not residents.
- I object that GBC continues to stand by its discredited and unreliable estimate for future housing need and fails to adjust this downwards by considering its erroneous assumption about student population forecasts in Guildford. This would of course impact on housing need across neighbouring areas including Send.

**MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY**

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

**Attached documents:**
MM42 LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

• I object to the proposal that an industrial unit be developed in this area, and the failure to demonstrate need or benefit.
• I object to GBC proposing this development in the face of the Employment Land Needs assessment showing a reduction in demand for industrial land. It is not desired nor justifiable.
• I object to GBC proposing building this site, without demonstrating special circumstances and contradicting
• I object to GBC proposing the development of industrial sites in the Green Belt where there is unused capacity in Slyfield.
• I object that this proposal, coupled with 25% increase at Send Business Centre means there is a much bigger concentration of such land use with no proven demand, and is both disproportionate and unfair when comparing Send with other villages.

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

• I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM44 - LPMM18/4754 Respondent: Katherine Pyne 15057889 Agent:

MM44 LAND AT ALDERTON’S FARM, SEND MARSH ROAD, POLICY A63

• I object because this additional development will result in traffic and increased pressure on already over-utilised and traffic blocked roads in the village.
• I object because wildlife will be displaced.
• I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
• I object to the late inclusion of this site, deleted from an earlier draft due to the strength of local objections and that GBC ignore these by only re-inserting this proposal at the public examination in July. This late inclusion does not follow correct process or allow for legitimate consultation.
• I object to this development as it will contradict Government guidance in their proposals to build on Greenbelt land and because GBC fail to provide ‘exceptional circumstances’ to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
• I object that this development is proposed on Green Belt Land and will destroy countryside.
• I object because local infrastructure will not be able to support the additional demands of new residents.
• I object because GBC continues to promote excessive and unnecessary housing demand, rather than allowing for open and democratic evaluation of housing need in the area.
• I object because the proposal of adding 770 houses to our village (including 550 at Garlicks Arch, 60 at Clockbarn, 40 at Winds Ridge) is disproportionate and places excessive and unachievable demand on local services roads and the infrastructure and character of our village. The addition of 770 new houses to the current population of 1700 properties would be an increase of more than 45%. This cannot be accommodated by the existing infrastructure.

Attached documents:

Comment: MM48 - LPMM18/4758 Respondent: Katherine Pyne 15057889 Agent:
MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM9 - LPMM18/4756  Respondent: Katherine Pyne 15057889  Agent:

MM9 GREEN BELT POLICY

I object to the GBC claim that they are protecting the Green Belt as this is highly subjective and exposing any land on the edge of our village for excessive and over-development.

I object as the approach proposed will create significant opportunities for interested parties to undermine and erode the protections enshrined in the green belt designation and will certainly lead to the continued expansion of the settlement boundaries.

I object to the wording of policy paragraph (1) as it is devoid of meaning. The paragraph states that “Inappropriate development will not be permitted unless very special circumstances can be demonstrated”. Are we to understand that inappropriate development will be permitted in special circumstances? The paragraph goes on to state that “Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. This is clearly nonsense masquerading as reason and provides no objective criteria for its application.

I object to all proposals to build on Green Belt land in the borough and that GBC uses discredited and exaggerated housing ‘need’ data to support this. Urban brownfield areas could accommodate all the true and required development that is needs and such sites are close to existing transport systems and links. NO such infrastructure exists in our village.

Attached documents:

Comment: MM45 - LPMM18/583  Respondent: Neil Aust 15062017  Agent:

This is green field, green belt land and as such I do not think appropriate to shoehorn into the local plan at the last minute for no apparent reason other than make up GBC’s numbers. The village infrastructure, especially but not exclusively the roads, cannot cope with another 105 families. The site includes part of a lovely countryside public footpath. It appears from the previous versions of the local plan, the proposed development of Blackwell Farm and this proposal, that what GBC really wants to do is extend the town borders all the way to Aldershot. If that is the case, please make it clear so those of us who live in the countryside can leave now.

Attached documents:

Comment: MM2 - LPMM18/1905  Respondent: Ms Nicola Adams 15067361  Agent:

Housing numbers are no longer justified following Brexit and reduced net immigration numbers. Future housing needs study should be revisited.
1) The settlement boundary for West Horsley is inappropriately drawn in the area to the East of the Street, in immediate proximity to the Village Green (Local Green Space). The proposed line encapsulates agricultural land adjacent to the Green which, should it be developed, would permanently and detrimentally impact the natural landscape of this heritage community space. We urge GBC to redraw the line to exclude this land and maintain the existing settlement edge.

2) Infilling beyond the existing settlement boundary should not be considered as appropriate given the considerable risk to the rural nature of the villages.

Attached documents:

Comment: MM9 - LPMM18/1909  Respondent: Ms Nicola Adams 15067361  Agent:

Map area associated w/ West Horsley settlement boundary - red area highlights agricultural land which should be excluded from settlement boundary or risk permanently and detrimentally damaging the heritage Village Green.

Attached documents:  W_Horsley_Settlement_Boundary.JPG (25 KB)

Comment: MM9 - LPMM18/1915  Respondent: Ms Nicola Adams 15067361  Agent:

I object to the proposal to build 550 houses at Garlick's Arch. The impact of 550 households on traffic around Send will be devastating, it is currently subject to long jams during peak periods, increased traffic will increase noise and air pollution. 550 new homes will totally change the character of this rural village. It will be a tragedy to build on ancient woodland which is part of the green belt area - brown field sites are available elsewhere. The area is often flooded and is contaminated by lead shot. The plan does not take into account the fact that school and medical facilities already under stress and ill prepared to cope with extra pressure.

Attached documents:

Comment: MM41 - LPMM18/588  Respondent: Mr Anthony Fairbairn 15067393  Agent:

I object to this proposal because it will be built on green belt land, it is unnecessary as there is spare capacity for industrial sites at Slyfield. More industrial sites within Send village will change its character and result in increased traffic and pollution.

Attached documents:
Comment: MM44 - LPMM18/590  
**Respondent:** Mr Anthony Fairbairn 15067393  
**Agent:**  
I object to this proposal because it is a Green Belt area which should be preserved. It will change the character of Send forever. Additional traffic caused by the new homes will increase congestion and pollution along Send Marsh Road and at the junctions of Send Marsh Road with Portsmouth Road and Send Barns Lane. 120 homes will put more strain on schools and medical facilities (Ripley School has just been closed). This is a popular area for walkers the landscape and view will be ruined. The extra houses added to those proposed for Garlick’s Arch, Clockbarn, and Winds Ridge will result in an increase to the number of homes in Send by 45%.

**Attached documents:**

Comment: MM9 - LPMM18/591  
**Respondent:** Mr Anthony Fairbairn 15067393  
**Agent:**  
I object to any loss of the Green Belt, there are plenty of Brown Field sites available in Surrey.

**Attached documents:**

Comment: MM41 - LPMM18/845  
**Respondent:** Anita Fairbairn 15067425  
**Agent:**  
I love living in Send Marsh. It is part of Send village, and contains green fields, ancient woodland with a lovely balance of homes and open spaces. I was horrified to discover that despite having previously objected to several proposals in the Guildford Local Plan which were likely to affect the character and quality of life of Send, the latest version of the plan actually has a more negative impact on Send than before.

MM41  
I object strongly to the proposal to build 550 houses at Garlick’s Arch. The impact of 550 households on traffic around Send will be devastating, it is currently subject to long jams during peak periods, increased traffic will increase noise and air pollution. 550 new homes will totally change the character of this rural village. It will be a tragedy to build on ancient woodland which is part of the green belt area - brown field sites are available elsewhere. The area is liable to flooding and is contaminated by lead shot. The plan does not take into account the fact that school and medical facilities already under stress and ill prepared to cope with extra pressure.

**Attached documents:**

Comment: MM44 - LPMM18/846  
**Respondent:** Anita Fairbairn 15067425  
**Agent:**  
MM44  
I object to this proposal because the fields where it is proposed to build 120 houses are a beautiful part of my local neighbourhood. I frequently walk past them as part of my fitness regime. They are in a Green Belt area which should be preserved. This proposal will change the character of Send forever. Additional traffic caused by the new homes will increase congestion and pollution along Send Marsh Road and at the junctions of Send Marsh Road with Portsmouth.
Road and Send Barns Lane. 120 homes will put more strain on schools and medical facilities (Ripley School has just been closed). This is a popular area for walkers the landscape and views will be ruined. The extra houses added to those proposed for Garlick's Arch, Clockbarn, and Winds Ridge will result in an increase to the number of homes in Send by 45%. This is unacceptable.

I object to any loss of the Green Belt, there are plenty of Brown Field sites available in Surrey. The whole point of having the Green Belt is to stop unnecessary development, to protect the flora and fauna of the area and to continue to ensure that for generations to come there are green spaces.

I am very concerned that all of the developments which are proposed for Send will have an adverse effect on the traffic and the roads. The proposals for Garlick's Arch, Burnt Common, Alderton's Farm and Clockbarn will inevitably lead to increased noise, air pollution and congestion along Send Barns Lane and Send Road. The proposed A3 changes and changes to the slip road will not be able to mitigate against the overall increase in sheer weight of traffic.

Send appears to have been unfairly targeted for a 45% increase in housing and extra industrial development. If these proposals go through, Send will be transformed from a beautiful, green village to yet another characterless piece of urban sprawl with a diminished quality of life for all its residents. Please don't approve these proposals.

Attached documents:


The traffic implications for Send with Garlick's Arch, Burnt Common, Clockbarn and Alderton's would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.

Attached documents:

Comment: MM41 - LPMM18/484  Respondent: Ann Elms 15067585  Agent: MM41 Land at Garlicks Arch, Send Marsh, Policy A43

I wish to object to the recent modifications to the above plan. I think Guildford Borough Council have failed to consider the residents of Send with an excessive amount of development in our area. These are my principal objections.

The increase of 37% in the number of houses is ridiculously high. It would alter the character of the village, join up Send and Ripley so that it was over-developed and make it one large conglomeration of housing. A very high number of objections to the previous lower number of 400 have been completely ignored. You intend to develop Green Belt land, which floods and is contaminated by leadshot. The local infrastructure for medical facilities and schools would be swamped by this development, as would the adjacent roads. Send Barns Lane is frequently at a standstill in the mornings already. this development would make it worse and it would be gridlocked on a daily basis.

Attached documents:
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<th>Comment: MM41 - LPMM18/489</th>
<th><strong>Respondent:</strong> Ann Elms 15067585 <strong>Agent:</strong></th>
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**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send with Garlick's Arch, Burnt Common, Clockbarn and Alderton's would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.

**Attached documents:**

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<th>Comment: MM42 - LPMM18/485</th>
<th><strong>Respondent:</strong> Ann Elms 15067585 <strong>Agent:</strong></th>
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**MM42 Land at Burnt Common, London Road, Send, Policy A58**

I live very near to this proposed development and I cannot understand why this industrial and storage development is back in the plan, after having been deleted from the 2014 plan. It is far too large an industrial development for any village in the borough and there is absolutely no need for it when there is unused space at Slyfield. I understand the Employment Land Needs Assessment showed a reduction in demand for industrial land so it is incomprehensible to develop this site, especially with this being on top of a 25% increase in Send Business Centre. Again, you would be gridlocking surrounding roads, especially the roundabout by the present Shell garage/Little Waitrose roundabout at Send Barns Lane. It would make life intolerable for residents, as well as poisoning them with dangerous levels of nitrogen dioxide. Please take this out of the plan and see sense.

**Attached documents:**

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<th>Comment: MM44 - LPMM18/486</th>
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**Comment: MM44 - LPMM18/486** **Respondent:** Ann Elms 15067585 **Agent:**  

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**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send with Garlick's Arch, Burnt Common, Clockbarn and Alderton's would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.

**Attached documents:**
MM44 Land at Alderton's Farm, Send Marsh Road Policy A63

Here again, you are intending to build on Green Belt land, which contradicts policy MM9. Send Crossroads will be under considerable pressure and with Garlicks Arch, Clockbarn and Winds Ridge developments, 770 houses would be added to the 1700 currently in Send, which is an increase of 45%. There is no rationale for this and it would ruin Send and the surrounding Green Belt.

Attached documents:

Comment: MM48 - LPMM18/491 Respondent: Ann Elms 15067585 Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send with Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s would not be adequately solved by the A3 changes and the Clandon slip roads. Add in the developments at Gosden Hill and Wisley/Ockham and you will have major problems in the future with traffic. I would suggest you come out to view Send Barns Lane and the roundabout by Little Waitrose at the rush hour, around 8.30 am and just imagine how the levels of noise, pollution, delays would be increased intolerably both for the existing residents and for the proposed new residents. The roads would be gridlocked.

Please do not ignore the objections of Send Residents. We have already objected en masse in the past to the unfair proposals of Guildford Borough Council where it has been proposed that Send is swamped with new developments, completely changing the nature and character of the village. These developments should be spread around some of the other villages. Send would become effectively a suburb of Woking with these developments.

Yours with great indignation at the lack of consideration to the objections already made by Send residents

Attached documents:

Comment: MM9 - LPMM18/487 Respondent: Ann Elms 15067585 Agent:

MM9 Green Belt Policy

The proposed developments contradict Green Belt Policy and this could mean that any land on the fringes of our village could be developed in the future. Our village environment would be changed beyond recognition.

Attached documents:

Comment: MM27 - LPMM18/328 Respondent: Sabine Marke-Deleau 15081281 Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC
offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/324  Respondent: Sabine Marke-Deleau 15081281   Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The increase from 400 to 550 homes of which 450 to be built in the first five years

- It is Green Belt containing ancient woodland
- An increase of 37% in the number of houses proposed is excessive
- 7000 ejections to the previous lower number have been ignored
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

Comment: MM41 - LPMM18/329  Respondent: Sabine Marke-Deleau 15081281   Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/325  Respondent: Sabine Marke-Deleau 15081281   Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerously high.

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Attached documents:

Comment: MM44 - LPMM18/326  Respondent: Sabine Marke-Deleau 15081281  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

New site for 120 Homes including some self build

• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July.
• It is a Green Belt site with no special circumstances so it also contradicts Policy MM9.
• It will detract from the heritage buildings at Send Marsh Green.
• The additional traffic will increase pressure on the Send Crossroads.
• With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/331  Respondent: Sabine Marke-Deleau 15081281  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

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Attached documents:
Comment: MM9 - LPMM18/327  Respondent: Sabine Marke-Deleau 15081281  Agent:

MM9 Green Belt Policy

Although the ‘modifications’ claim to protect the Green Belt except in very special circumstances GBC make an exception for ‘limited infilling outside of the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents and the environment.

Attached documents:

Comment: Other comments - LPMM18/332  Respondent: Sabine Marke-Deleau 15081281  Agent:

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM41 - LPMM18/119  Respondent: Gary Cable 15081569  Agent:

I was very disappointed to read about the modifications to the local plan following the consultations since the release in 2017. Not only have you not taken into account the thousands of objections we sent you by lessening the proposed sites, you have actually made the plan worse for our villages by increasing the homes and industrial land. I along with many others seriously believe the villages of Send and Ripley will be ruined over the next few years if all these plans go ahead, let alone we will no longer be living in a nice green belt area, the traffic congestion which is not brilliant at the moment will be catastrophic for the region.

Lets start on the traffic congestion, there are currently 1700 homes in Send and the MM41 and MM44 proposing another 670 new homes we are going to have nearly another 50% more cars on the road in the local area. Where are all these cars going during rush hour - Woking to commute (the A247 cannot cope presently during peak times you can queue for 30 minutes plus into Old Woking) - the A3 into London which will clog up Send Marsh Road, plus Ripley and of course the A3 -M25 junction more than it is right now.

Going back to MM41 and the proposed 550 new homes at Garlick's Arch how are local medical and school facilities going to cope - Ripley has just seen the closing of one school so how will the area cope with a nearly 50% INCREASE in residents !!!

By the time you have finished ruining the local area Guildford will sprawl into Woking and we will have no Green Belt and no wonderful local Villages where we all chose to live !!!

Attached documents:
Add to this some industrial traffic for the MM42 modification why not just pollute all the locals in Send and Ripley over the next few years.

Talking about the MM42 modification - why is this Burnt Common Green Belt land even being considered for Industrial use when there there is still capacity in Slyfield where nobody has to be affected. On top of this I understand the Employment Land Needs Assessment showed a reduction in demand for industrial land - where is the justification for ruining Green Belt land !!

Attached documents:

I was very disappointed to read about the modifications to the local plan following the consultations since the release in 2017. Not only have you not taken into account the thousands of objections we sent you by lessening the proposed sites, you have actually made the plan worse for our villages by increasing the homes and industrial land. I along with many others seriously believe the villages of Send and Ripley will be ruined over the next few years if all these plans go ahead, let alone we will no longer be living in a nice green belt area, the traffic congestion which is not brilliant at the moment will be catastrophic for the region.

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MM44 - 120 homes at Alderton's Farm - this was previously deleted from the plan because of objections, it is Green Belt again with no special circumstances so therefore contradicting policy MM9.

Attached documents:

MM44 - 120 homes at Alderton's Farm - this was previously deleted from the plan because of objections, it is Green Belt again with no special circumstances so therefore contradicting policy MM9.

Attached documents:

MM27, MM41, MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC
Offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment: MM41 - LPMM18/333**  **Respondent: Antony Marke 15082049**  **Agent:**

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

The increase from 400 to 550 homes of which 450 to be built in the first five years

- It is Green Belt containing ancient woodland
- An increase of 37% in the number of houses proposed is excessive
- 7000 ejections to the previous lower number have been ignored
- It will join Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

**Comment: MM41 - LPMM18/338**  **Respondent: Antony Marke 15082049**  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment: MM42 - LPMM18/334**  **Respondent: Antony Marke 15082049**  **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerously high.

Attached documents:

Comment: MM42 - LPMM18/339  Respondent: Antony Marke 15082049  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/335  Respondent: Antony Marke 15082049  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

New site for 120 Homes including some self build

• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July.
• It is a Green Belt site with no special circumstances so it also contradicts Policy MM9.
• It will detract from the heritage buildings at Send Marsh Green.
• The additional traffic will increase pressure on the Send Crossroads.
• With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/340  Respondent: Antony Marke 15082049  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:
Comment: MM9 - LPMM18/336  Respondent: Antony Marke 15082049  Agent:

MM9 Green Belt Policy

Although the ‘modifications’ claim to protect the Green Belt except in very special circumstances GBC make an exception for ‘limited infilling outside of the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents and the environment.

Attached documents:

Comment: Other comments - LPMM18/341  Respondent: Antony Marke 15082049  Agent:

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM2 - LPMM18/192  Respondent: Mark Gibbs 15082657  Agent:

I am writing to object to the proposed travellers site and 40 house on Send hill

Not to mention all the other prospered plan such as MM44 & MM41/MM9/MM42/MM48

This was once a peaceful and picturesque little village that has slowly been eroded and destroyed by greedy and thoughtless developers

I have lived in send for 20 years and it is sickening and sad to see it being over developed

So I strongly object to the plans to specified above

Attached documents:

Comment: MM42 - LPMM18/195  Respondent: Mark Gibbs 15082657  Agent:

Not to mention all the other prospered plan such as MM44 & MM41/MM9/MM42/MM48

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So I strongly object to the plans to specified above

Attached documents:
**Comment: MM41 - LPMM18/3954  Respondent: Mrs Marilyn Scott 15094369  Agent:**

I wish to place objections to the Local Plan

MM 41

The land for development is within the Green Belt and is a site of recognised Ancient Woodland

The site is subject to frequent flooding and is unsuitable for residential development

The Portsmouth Rd and Send Marsh Rd junction is a site of frequent accidents and congestion, at least 800 extra cars will now join this dangerous road layout at a point where traffic is at its heaviest.

In excess of 35% of additional housing is proposed from the original plan, this is excessive considering there was huge opposition to the previous plan.

**Attached documents:**

---

**Comment: MM42 - LPMM18/3955  Respondent: Mrs Marilyn Scott 15094369  Agent:**

MM42

This site was deleted from the 2014 plan as unsuitable – it has now returned double the size.

Slyfield has unused capacity we do not need another industrial site in the area, there is no demand for new industrial land, in fact the needs assessment shows a reduction in need for this kind of land

Narrow surrounding roads cannot cope with the amount of traffic generated

Nitrogen dioxide levels are already recording as dangerous here because of the A 3

**Attached documents:**

---

**Comment: MM44 - LPMM18/3956  Respondent: Mrs Marilyn Scott 15094369  Agent:**

MM44

This is green belt land with no special circumstances so contradicts MM9

The Send Crossroads is a dangerous and busy junction this development will increase traffic at both this junction and at the Portsmouth Rd, Send Marsh Rd junction already referred to.

Send Marsh Green is an area of high importance because of its heritage buildings. Any modern development will detract from this area of special historic character.

The re insertion of this development into the plan ignores all previous objections which caused it to be removed from the Local Plan.
It is proposed to put a gypsy camp in Send Hill, opposite Winds Ridge. The proposed land is Green Belt, it is also in a very pretty, quiet and [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. This proposal is absurd:

1. Green Belt land

2. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

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4. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

5. There will be an ever change of travellers coming and going, meaning noise and disturbance in Send Hill and Winds Ridge. The rolling change will mean [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

6. Send Hill is set within the countryside and on a narrow country road with wildlife with the shrubbery and fields surrounding. The caravans coming and going will disturb the hedges and wildlife.

7. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

8. There is a large community of elderly residents in Send Hill and Winds Ridge, due to the predominance of bungalows in this area. The elderly feel safe and they walk the country lane to meet and talk with their neighbours. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

9. The intended land is full of wildlife, animals and hedgerow - the use of this land will bring a huge loss to wildlife.

10. Walkers enjoy the land and surrounding land, it is used by the whole community and will affect the quality of life of residents. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]
I am writing to object to the proposed travellers site and 40 house on Send hill
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So I strongly object to the plans to specified above.

Attached documents:

Comment: MM48 - LPMM18/202  Respondent: Emma Gibbs 15100385  Agent:

Not to mention all the other prospered plan such as MM44 & MM41/MM9/MM42/MM48

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So I strongly object to the plans to specified above.

Attached documents:

Comment: MM9 - LPMM18/200  Respondent: Emma Gibbs 15100385  Agent:

Not to mention all the other prospered plan such as MM44 & MM41/MM9/MM42/MM48

This was once a peaceful and picturesque little village that has slowly been eroded and destroyed by greedy and thoughtless developers.

I have lived in send for 20 years and it is sickening and sad to see it being over developed.

So I strongly object to the plans to specified above.

Attached documents:

Comment: MM27 - LPMM18/520  Respondent: Malcolm Holland 15102049  Agent:

MM27/MM41/MM42 and MM48

The traffic implications for the above have not been adequately addressed and no proper assessment has taken place bearing in mind more traffic increased noise nitrogen pollution delays and gridlock.

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1. It is green belt site and will contradict policy MM9.

2. With other plans this is too much for our infrastructure and more pollution.

Attached documents:

Comment: MM48 - LPMM18/523  Respondent: Malcolm Holland 15102049  Agent:

MM27/MM41/MM42 and MM48

The traffic implications for the above have not been adequately addressed and no proper assessment has taken place bearing in mind more traffic increased noise nitrogen pollution delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/519  Respondent: Malcolm Holland 15102049  Agent:

MM9  I object as this will allow any land on the edge of our villages to be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM27 - LPMM18/83  Respondent: Simon Crane 15104769  Agent:

MM27, MM41, MM42 and MM48  Transport Strategy

- The planned changes to the A3 and Clandon slip roads are not sufficient to cope with the increased traffic that will arise from the proposed developments of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s.
- Queuing traffic for the A3 will back up into Send, again clogging the roads and increasing air pollution, plus traffic in to Woking through Send will also increase hugely.

Attached documents:

Comment: MM41 - LPMM18/80  Respondent: Simon Crane 15104769  Agent:

I wish to object to the Council’s Main Modifications for Send in their Local Plan.

I have been a resident in Send for over 30 years. My address is:

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]
My objections are as follows:

**MM41 Land at Garlick’s Arch, Policy A43**

You have increased the number of new homes to be built by nearly 40%. I objected to the previous plan of 400 homes, so these objections still stand:

- The huge increase in cars will cause congestion in the area. I believe most houses have 2 cars per household now, meaning an extra 1000+ cars. Air pollution will hugely increase.
- Our schools and medical practices will not cope with the extra children and patients – I already struggle booking appointments with my GP.
- This is a green belt area which is not supposed to be built on.
- This site is subject to frequent flooding, so not suitable for siting new homes.

I believe there were over 7000 objections to the originally planned lower number – these have been totally ignored.

**Attached documents:**

**Comment:** MM41 - LPMM18/84  **Respondent:** Simon Crane 15104769  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

- The planned changes to the A3 and Clandon slip roads are not sufficient to cope with the increased traffic that will arise from the proposed developments of Garlick’s Arch, Burnt Common, Clockharn and Alderton’s.
- Queuing traffic for the A3 will back up into Send, again clogging the roads and increasing air pollution, plus traffic in to Woking through Send will also increase hugely.

**Attached documents:**

**Comment:** MM42 - LPMM18/81  **Respondent:** Simon Crane 15104769  **Agent:**

**MM42 Land at Burnt Common, Policy A58**

- This was deleted from the 2014 plan and yet now you have more than doubled the planned industrial and storage space.
- This will be the largest new industrial allocation to any village in the borough.
- The Employment Land Needs Assessment showed there has been a reduction in demand for industrial land, not an increase, so none should be needed.
- As mentioned above, surrounding roads will have increased congestion and air quality will worsen.
- Why are we building on green belt land when there are other areas available that are more suitable (eg Slyfield)? I believe it also contradicts MM9, as there are no special circumstances.
- You are already increasing the Send Business Centre considerably.

**Attached documents:**

**Comment:** MM42 - LPMM18/85  **Respondent:** Simon Crane 15104769  **Agent:**
MM27, MM41, MM42 and MM48 Transport Strategy

- The planned changes to the A3 and Clandon slip roads are not sufficient to cope with the increased traffic that will arise from the proposed developments of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s.
- Queuing traffic for the A3 will back up into Send, again clogging the roads and increasing air pollution, plus traffic in to Woking through Send will also increase hugely.

Attached documents:

Comment: MM44 - LPMM18/82  Respondent: Simon Crane 15104769  Agent:

MM44 Land at Alderton’s Farm, Policy A63

- This plan was deleted previously due to the high number of objections and yet has been sneaked back in now.
- As with MM42, it is in the green belt with no special circumstances, so again contradicts MM9.
- Like MM41, it will increase the pressure on schools and medical practices, congest the roads and increase air pollution.
- With the other planned developments in the area it will add 770 houses to the current 1700, an increase of 45%.

Attached documents:

Comment: MM48 - LPMM18/86  Respondent: Simon Crane 15104769  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

- The planned changes to the A3 and Clandon slip roads are not sufficient to cope with the increased traffic that will arise from the proposed developments of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s.
- Queuing traffic for the A3 will back up into Send, again clogging the roads and increasing air pollution, plus traffic in to Woking through Send will also increase hugely.

I also note that this consultation only allows me to comment on the main changes, so other planned developments (including 40 houses and a travellers’ site on Send Hill plus 60 houses at Clockbarn, Tannery Lane) cannot be commented on. These will also negatively impact the village for the same reasons as MM41 and MM44.

Please help to keep our Village just that – a Village, not a sprawling development that will effectively join up Send and Ripley.

Attached documents:

Comment: MM27 - LPMM18/3810  Respondent: Y C Smithers 15106977  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for the area are devastating and as such totally overburdens traffic on local roads and also the A3, entering and leaving this enormously busy road which is regularly a car park! The new proposals don’t take into
consideration the traffic impact of the additional thousands of cars, let alone increased pollution, noise and likelihood of more accidents, especially during peak times.

Other developments

This consultation does not include the chance to comment/object to the 40 houses and travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and the increase in size to the Send Business Centre despite the Wey Conservation area, these proposals are again devastating to the local roads in all of these areas, they are too narrow, often difficult to pass and have many blind spots, and the larger roads are already standing traffic during peak times, let alone at other times of the day, the small village cannot take any more development especially of the sizes proposed.

We do hope you consider our strong objections to all of the above, as not only us but our family and friends will be severely impacted. We are pensioners and are already finding the amount of traffic too much and has significantly risen in recent years, especially with commuters using our village as a cut throughs from the A3 and M25.

Attached documents:

Comment: MM41 - LPMM18/3794  Respondent: Y C Smithers 15106977  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Increased from 400 to 550 homes of which 450 to be built in the first five years

The site is Green Belt containing ancient woodland, which we believe should be protected. The proposals are overdeveloped for this area and it will join up Ripley and Send and will generate two much traffic to the already oversaturated roads.

This area is prone to flooding, having been born in the village, I know this area well. The village facilities of school and medical centre are already overstretched to breaking point.

Attached documents:

Comment: MM41 - LPMM18/3811  Respondent: Y C Smithers 15106977  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for the area are devastating and as such totally overburdens traffic on local roads and also the A3, entering and leaving this enormously busy road which is regularly a car park! The new proposals don’t take into consideration the traffic impact of the additional thousands of cars, let alone increased pollution, noise and likelihood of more accidents, especially during peak times.

Other developments

This consultation does not include the chance to comment/object to the 40 houses and travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and the increase in size to the Send Business Centre despite the Wey Conservation area, these proposals are again devastating to the local roads in all of these areas, they are too narrow, often difficult to pass and have many blind spots, and the larger roads are already standing traffic during peak times, let alone at other times of the day, the small village cannot take any more development especially of the sizes proposed.
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Attached documents:

Comment: MM42 - LPMM18/3797  Respondent: Y C Smithers 15106977  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Increased from 400 to 550 homes of which 450 to be built in the first five years

The site is Green Belt containing ancient woodland, which we believe should be protected. The proposals are overdeveloped for this area and it will join up Ripley and Send and will generate two much traffic to the already oversaturated roads.

This area is prone to flooding, having been born in the village, I know this area well. The village facilities of school and medical centre are already overstretched to breaking point.

Attached documents:

Comment: MM42 - LPMM18/3812  Respondent: Y C Smithers 15106977  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for the area are devastating and as such totally overburdens traffic on local roads and also the A3, entering and leaving this enormously busy road which is regularly a car park! The new proposals don’t take into consideration the traffic impact of the additional thousands of cars, let alone increased pollution, noise and likelihood of more accidents, especially during peak times.

Other developments

This consultation does not include the chance to comment/object to the 40 houses and travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and the increase in size to the Send Business Centre despite the Wey Conservation area, these proposals are again devastating to the local roads in all of these areas, they are too narrow, often difficult to pass and have many blind spots, and the larger roads are already standing traffic during peak times, let alone at other times of the day, the small village cannot take any more development especially of the sizes proposed.

We do hope you consider our strong objections to all of the above, as not only us but our family and friends will be severely impacted. We are pensioners and are already finding the amount of traffic too much and has significantly risen in recent years, especially with commuters using our village as a cut throughs from the A3 and M25.

Attached documents:

Comment: MM44 - LPMM18/3799  Respondent: Y C Smithers 15106977  Agent:
MM44 Land at Alderton’s Farm, Send March Road Policy A63

New site for 120 homes including some self build

Send Marsh is a tiny hamlet, where I was born and grew up and many of my family still live in the area. The proposal will hugely destroy the area and will impact on all the residents many of whom have lived there for years and the road system is too small and is already overburdened. Send Crossroads is already treacherous especially during rush hour and school runs. The area is Green Belt and there is no justification to build houses in this area and contradicts Policy MM9. It is a devastating proposal.

Attached documents:

Comment: MM48 - LPMM18/3813 Respondent: Y C Smithers 15106977 Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for the area are devastating and as such totally overburdens traffic on local roads and also the A3, entering and leaving this enormously busy road which is regularly a car park! The new proposals don’t take into consideration the traffic impact of the additional thousands of cars, let alone increased pollution, noise and likelihood of more accidents, especially during peak times.

Other developments

This consultation does not include the chance to comment/object to the 40 houses and travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and the increase in size to the Send Business Centre despite the Wey Conservation area, these proposals are again devastating to the local roads in all of these areas, they are too narrow, often difficult to pass and have many blind spots, and the larger roads are already standing traffic during peak times, let alone at other times of the day, the small village cannot take any more development especially of the sizes proposed.

We do hope you consider our strong objections to all of the above, as not only us but our family and friends will be severely impacted. We are pensioners and are already finding the amount of traffic too much and has significantly risen in recent years, especially with commuters using our village as a cut throughs from the A3 and M25.

Attached documents:

Comment: MM9 - LPMM18/3795 Respondent: Y C Smithers 15106977 Agent:

MM9 Green Belt Policy

These proposals do not protect the Green Belt as claimed and causes considerable uncertainty and negates Green Belt protection in the area.

Attached documents:

Comment: MM27 - LPMM18/68 Respondent: Andy Williams 15107041 Agent:
### MM27, MM41, MM42, MM48 - Transport Strategy

The implications have not been properly assessed or addressed by the A3 changes and the Clandon slip roads. Potential significant traffic impact upon Send Barnes Lane and Send Road of traffic heading for Woking, increased noise and pollution levels, additional delays and gridlock on the roads.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/64</th>
<th>Respondent: Andy Williams 15107041</th>
<th>Agent:</th>
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</table>

Dear Sir/Madam

I am writing with the following strong objections to the local plan:

**MM41 – Land at Garlicks Arch, Send Marsh, Policy A43**

The initial proposal to build 400 homes at Garlicks Arch was a ridiculous proposal and received 7000 objections. The previous objections to this have been ignored. To have increased this to 550 homes (an increase of 37%) is overly excessive and is made in complete disregard of the previous objections. The land is in the Green Belt and contains ancient woodland, drainage is poor and the land is subject to frequent flooding, it is also contaminated with lead shot. Development here would join up the villages of Ripley and Send, there would be no distinction between the two villages constituting over development. Perhaps most significantly, the surrounding infrastructure cannot cope – roads around the village are snarled up with traffic with increasing pollution levels, the increased volume of traffic, (assuming the majority of households have two cars), is unmanageable and from a health standpoint it increases risk. The doctor’s surgery is at breaking point, as verbalised by the staff at the surgery directly, local schools cannot cope, (and a local infants school in Ripley has been closed increasing the pressure on the remaining schools in the area).

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/65</th>
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**MM27, MM41, MM42, MM48 - Transport Strategy**

The implications have not been properly assessed or addressed by the A3 changes and the Clandon slip roads. Potential significant traffic impact upon Send Barnes Lane and Send Road of traffic heading for Woking, increased noise and pollution levels, additional delays and gridlock on the roads.

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industrial land. With industrial units till empty in the Borough it is ludicrous to propose increasing the initial proposal of 7000 to 14,800 square meters of industrial sites and storage, indeed the original proposal of 7000 sq m is not required – Slyfield has unused capacity for example and there are no special circumstances which contradict MM9. The village is already significantly under strain from the thunderous HGVs that pass through our roads, these are already gridlocked and pollution levels are already dangerously high.

Attached documents:

**Comment:** MM42 - LPMM18/70  **Respondent:** Andy Williams 15107041  **Agent:**

**MM27, MM41, MM42, MM48 - Transport Strategy**

The implications have not been properly assessed or addressed by the A3 changes and the Clandon slip roads. Potential significant traffic impact upon Send Barnes Lane and Send Road of traffic heading for Woking, increased noise and pollution levels, additional delays and gridlock on the roads.

Attached documents:

**Comment:** MM44 - LPMM18/66  **Respondent:** Andy Williams 15107041  **Agent:**

**MM44 – Land at Alderton’s Farm, Send Marsh Road, Policy A63**

Yet another proposal for an unrealistic number of homes, 120 (including some self-build) on top of what’s being proposed at Garlicks Arch, Clockbarn, Winds Ridge – in total a proposal of 770 houses in addition to the 1700 currently in Send, an increase of 45% which is completely unrealistic and too much for the surrounding infrastructure. This was deleted from an earlier draft of the local plan because of all the objections and not re-inserted until the public examination in July. Again this is a Green Belt site with no special circumstances which contradicts policy MM9.

Attached documents:

**Comment:** MM48 - LPMM18/71  **Respondent:** Andy Williams 15107041  **Agent:**

**MM27, MM41, MM42, MM48 - Transport Strategy**

The implications have not been properly assessed or addressed by the A3 changes and the Clandon slip roads. Potential significant traffic impact upon Send Barnes Lane and Send Road of traffic heading for Woking, increased noise and pollution levels, additional delays and gridlock on the roads.

It's about time reasonable proposals were submitted in the local plan, constant challenge an objections to the plan are not helpful and are no doubt expensive to manage. Reasonable proposals are likely to be viewed more favourably.

Regards

Andrew Williams
MM9 – Green Belt Policy

Modifications claim to protect the Green belt except in very exceptional circumstances. This is highly subjective, introduces uncertainty and potentially negates Green Belt protection.

Comment: MM9 - LPMM18/67  Respondent: Andy Williams 15107041  Agent:

Comment: MM41 - LPMM18/1320  Respondent: Mr Paul Ayers 15107777  Agent:

My objection relates to MM41. The increase in housing numbers fro 400 to 550 is disproportionate and would, in addition to the other proposals for Send and SendMarsh create a significant urbanisation to an area which is only just recovering from previous development during the 1960-1980 period. The local infrastructure is just not up to supporting such numbers.

In addition is it fair to build new homes so close to the A3 with associated and now well publicised pollution issues. If Garlick’s Arch is to be developed I would prefer a much lower number of units, and certainly no larger than the originally proposed 400.

Thank you for the opportunity to comment.

Comment: MM27 - LPMM18/350  Respondent: Louise Majithia 15109601  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Comment: MM41 - LPMM18/346  Respondent: Louise Majithia 15109601  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43
The increase from 400 to 550 homes of which 450 to be built in the first five years

- It is Green Belt containing ancient woodland
- An increase of 37% in the number of houses proposed is excessive
- 7000 ejections to the previous lower number have been ignored
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

**Comment:** MM41 - LPMM18/351  **Respondent:** Louise Majithia 15109601  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM42 - LPMM18/347  **Respondent:** Louise Majithia 15109601  **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerously high.

Attached documents:

**Comment:** MM42 - LPMM18/352  **Respondent:** Louise Majithia 15109601  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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<td>• It is a Green Belt site with no special circumstances so it also contradicts Policy MM9.</td>
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<td>• It will detract from the heritage buildings at Send Marsh Green.</td>
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<td>• The additional traffic will increase pressure on the Send Crossroads.</td>
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<td>• With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.</td>
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<td>Although the ‘modifications’ claim to protect the Green Belt except in very special circumstances GBC make an exception for ‘limited infilling outside of the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents and the environment.</td>
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<td></td>
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**Attached documents:**
**Comment:** Other Developments  

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

**Attached documents:**

**Comment:** MM41 - LPMM18/319  

Send is a small village and this development is completely out of proportion to the abilities of the social, road and domestic infrastructure of Send. Seven thousand residents objected to the original development yet it has now been increased by 37%. There is no mention or requirement to meet the costs of developing the local schools, medical centre, roads and drainage. The site frequently floods and the surrounding roads are frequently heavily congested. This development will fill in the only green space between the villages of Send and Ripley and destroy the character of both villages.

**Attached documents:**

**Comment:** MM42 - LPMM18/320  

This will be the largest industrial development in any village in the Guildford area that is utilising green belt land. There is currently space available within existing industrial sites like Slyfield that do not require the loss of existing green space. This also suggests that there is also no requirement for the expansion of industrial space. The local roads cannot cope with the use and size of the lorries that would use this type of industrial development and with the A3 already and gridlocked roads creating dangerously high pollution levels.

**Attached documents:**

**Comment:** MM44 - LPMM18/321  

This large site has previously met with large scale objections because the development is out of proportion to the ability of the village to support it. The send march area is a historic rural area with no local amenities and small roads. A development of this size will destroy the village by completely overwhelming it. The roads will be impassable, and the schools, health centre and infrastructure will be unable to cope.

**Attached documents:**
there has been no assessment of the aggregate traffic impact on Send Barnes lane and Send road as traffic exiting the A3 to travel to Woking. These roads are already gridlocked during rush hours and they also contain the village School, health centre, shops and park. The increased traffic in the heart of Send will destroy the character of the village, increase noise and NO2 pollution. This strategy of pushing more traffic through the centre of the village is completely at odds with the councils own healthy living strategy.

Attached documents:

None of the modifications protect the green belt. This will enable developers to pick of pockets of land surrounding small villages like Send, send March and Ripley. The character and history of these areas will be lost forever if these proposals are passed

Attached documents:

I object to the planned A3 junction changes at Burnt Common due to the effect on the surrounding villages.

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

Attached documents:

I object to the (excessive) 37% increase in the number of houses proposed at the Garlick’s Arch development. This is Green Belt land containing ancient Woodland and is subject to flooding and contamination by led shot. The local infrastructure is not fit for purpose with an approximate additional 800 cars, and the medical and school facilities cannot support this additional housing. Local schools are already overwhelmed with new applicants in addition to the decision to close Ripley Primary school.

Attached documents:
MM42 Land at Burnt Common, London Road, Send, Policy A58

I object to the fact that we purchased a house on Burnt Common Lane with views over fields and now the modified local plan want to remove this view and replace industrial units twice the size of the original local plan. This is not required on Green Belt land where Syfield has unused capacity and the Employment Land Needs Assessment showed a reduction in demand for industrial land.

Attached documents:

Comment: MM42 - LPMM18/4047  Respondent: Jo Wright 15114017  Agent:

MM27 MM41 MM42 MM48 Transport Strategy

I object to the planned A3 junction changes at Burnt Common due to the effect on the surrounding villages.

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

Attached documents:

Comment: MM48 - LPMM18/4048  Respondent: Jo Wright 15114017  Agent:

MM27 MM41 MM42 MM48 Transport Strategy

I object to the planned A3 junction changes at Burnt Common due to the effect on the surrounding villages.

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

Attached documents:

Comment: MM41 - LPMM18/1778  Respondent: Mrs Katherine Mutton 15115201  Agent:

I object to the infilling of land between Send and Ripley and the joining up of the villages. There is no justification in the increase in the number of houses as the population has not increased to justify this huge development.

The A247 is single line traffic with two small bridges between Send and Woking. This development will cause mayhem on the roads.

There are not the local schools or Doctors to support the size of this housing development.

Attached documents:
**Comment: MM42 - LPMM18/1790  Respondent: Mrs Katherine Mutton 15115201  Agent:**

I object to this proposal. There is no research that supports the need for such a large increase in industrial and storage space. There is already a large increase at Send Business Centre and coupled with this it makes an unjustified amount of development.

The Employment Land Needs Assessment shows a reduction in the demand for industrial land locally.

The impact of business vehicles will make local roads impassable at certain times of the day.

**Attached documents:**

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**Comment: MM44 - LPMM18/1802  Respondent: Mrs Katherine Mutton 15115201  Agent:**

I strongly object to the development of this Green Belt land when there is no justification and no special circumstances to justify this proposal. The proposal for 120 homes will make a huge impact on the size of the village and all traffic will have to use the Send Marsh Road one way or another. The traffic implications of this development have not been properly assessed. Ripley School has just been closed and Send School is full so where are these families going to send their children. The Doctors Surgery in Send cannot cope with the numbers already registered.

With the proposed 550 houses at Garlicks Arch, Clockbarn 60, Winds Ridge 40 it adds 770 houses to the 1700 currently in Send. A huge and unjustified increase. Where are the people with the money to buy these houses - property is not selling at the moment because the costs are too high.

**Attached documents:**

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**Comment: MM27 - LPMM18/136  Respondent: Roger Mutton 15131425  Agent:**

MM27, MM41, MM42 and MM48 [Transport Strategy has not been properly assessed with regard the new proposed A3 and Clandon intersections, which will only encourage more vehicles to head into Woking every day increasing noise, N02, delays and worse still past a new Junior school and Primary School right beside the main A road through the village.]

**Attached documents:**

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**Comment: MM41 - LPMM18/132  Respondent: Roger Mutton 15131425  Agent:**

Local Plan Objections

I write to object the plans and policy now under consultation, which is ignoring the fact that the Green Belt is threatened needlessly and the infrastructure is inadequate to support the extra proposed developments.

MM41 [Polic A43 I object] to the increase in houses proposed in the latest consultation which despite vigorous opposition earlier has been increased by 37% not reduced. This folly, if allowed to proceed, will create additional and excessive traffic volume, leading to congested roads especially in Send at the crossroads and a new disastrous drop in air quality. The quality of life for residents and new householders is at risk.
MM27, MM41, MM42 and MM48 Transport Strategy has not been properly assessed with regard to the new proposed A3 and Clandon intersections, which will only encourage more vehicles to head into Woking every day increasing noise, NO2, delays and worse still past a new Junior school and Primary School right beside the main A road through the village.

MM27, MM41, MM42 and MM48 Transport Strategy has not been properly assessed with regard to the new proposed A3 and Clandon intersections, which will only encourage more vehicles to head into Woking every day increasing noise, NO2, delays and worse still past a new Junior school and Primary School right beside the main A road through the village.

Comment: MM41 - LPMM18/137  
Respondent: Roger Mutton 15131425  
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Comment: MM42 - LPMM18/138  
Respondent: Roger Mutton 15131425  
Agent:

Comment: MM44 - LPMM18/134  
Respondent: Roger Mutton 15131425  
Agent:
MM44 Policy A63 Alderton's Farm I object as this is a Green Belt area and with no special circumstances so contradicts policy MM9. (limited infilling) Where is the limit?

It was deleted from an earlier draft because of the strength of objections and only re-instated at the public examination in July. It is quite against all normal considerations of a democratic process, bringing the planning law into disrepute. The additional traffic at Send Crossroads will increase the pollution on an already busy junction. It will detract from the heritage buildings in Send Marsh Green and increases the proposed number of houses at Garlick's Arch (55) Clockbarn (60) Winds Ridge (40) means a 45% increase to the current 1700 in Send, without including the development on Potters Lane Send Hill junction and whatever is being slipped through opposite the Primary School where a site is now being cleared.

Attached documents:

Comment: MM48 - LPMM18/139 Respondent: Roger Mutton 15131425  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy has not been properly assessed with regard the new proposed A3 and Clandon intersections, which will only encourage more vehicles to head into Woking every day increasing noise, N02, delays and worse still past a new Junior school and Primary School right beside the main A road through the village.

Attached documents:

Comment: Other comments - LPMM18/133 Respondent: Roger Mutton 15131425  Agent:

I understand that I am now unable to object to Site A44 proposals, which is an outrage. Bearing in mind that the report E.2978.SN_HCP dated 5th January 2005 identified the proposed site is a local authorised landfill site as licenced under Part II of the Enviromental Protection Act 1990. It is not a quarry as specified in the GBC Local Plan and has "areas of potentially contaminative industrial activities".

Attached documents:

Comment: MM41 - LPMM18/161 Respondent: Samuel Holwell 15131969  Agent:

I am writing to object to several of your development plans and recent modifications to these.

MM41 Garlicks Arch. The initial plan of building 400 homes seemed excessive to say the least given the immense strain it would place on local infrastructure and the lack of plans to develop nearby roads and services. Given this, plus 7,000 objections which highlighted this, increasing the development to 550 homes seems short-sighted at best and suggests you don’t care for the views of local people.

Attached documents:

Comment: MM42 - LPMM18/162 Respondent: Samuel Holwell 15131969  Agent:
**MM42 Burnt Common.** There is absolutely no need for further industrial and storage sites in the area. Not only is there unused capacity at Slyfield Green, an area where expansion should be focused, but Send itself has already increased its business centre by 25% with no proven demand. The lack of demand perhaps suggests the council may be shifting to a communist view of things, in which it will subsequently “create” business artificially. Such a transition would not be shocking and consistent with other policy as it has already shown it does not care for local peoples’ views, a key socialist regime characteristic.

**Attached documents:**

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**Comment:** MM44 - LPMM18/163  **Respondent:** Samuel Holwell 15131969  **Agent:**

**MM44 Alderton’s Farm.** Surprised (more accurately unsurprised as the council’s actions are no longer shocking) to see this was re-added after its prior removal due to objections. Surely no need to reiterate objections so please refer to letters sent in by locals before.

**Attached documents:**

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**Comment:** MM9 - LPMM18/164  **Respondent:** Samuel Holwell 15131969  **Agent:**

**MM9 Green Belt Policy.** A subjective test should not be at the heart of Green Belt Policy. Need anymore be said – different people will the test differently and the result will be an inconsistent and incongruent application of policy, a highly undesirable result.

**Attached documents:**

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**Comment:** MM27 - LPMM18/2483  **Respondent:** Sylvia Pyne 15138433  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The changes to the A3 will make things even worse for Send with the traffic from the above developments coming straight through the village to Woking. This will mean unacceptable pollution, which has been increasing over the years and which I find is already causing more breathing problems for me as an asthmatic living on Send Road, so what it will do to children walking to school along Send Road and Send Barnes Lane with increasing nitrogen dioxide pollution exacerbated by the delays and gridlock it will cause. We are supposed to be encouraging more children to walk and this will only give parents an excuse to use their cars even more, and who could blame them.

More consideration should be given to the siting of additional housing elsewhere, as we are bearing an unacceptably large proportion of the new housing and development in the Guildford area, which should be spread more evenly through the villages etc. It appears we are getting about 50% of all development in the next 5 years, which can’t be right. For this reason I feel I have no other alternative but to object strongly to the enlarged burden which we are now being asked to bear, and it seems every time we object we are just given more development as our reward.

**Attached documents:**
Comment: MM41 - LPMM18/2479  Respondent: Sylvia Pyne 15138433  Agent:

MM41 Land at Garlicks Arch, Send Marsh Policy A43

There has been an increase from 400 to 550 homes and I feel this is too many for the village. It is on Green Belt and will encroach onto ancient woodland. Send and Ripley will merge together and cause more flooding. The extra cars will block up the roads which already become stop-start especially Send Road, which we can see most mornings. Traffic surveys seem to be done during holiday times, or when the children are not at school so do not seem to be a true representation of the normal daily event during the working week.

With regard to the medical facilities I have personal experience of how difficult it is at present to get an appointment and with all the extra housing proposed for our village and the surrounding area will make it almost impossible to get the type of medical care the village has enjoyed for most of the last 30 odd years we have lived in this village. The school is already limited in the number of children it can accept and this will make it even harder to cater for the demand. This cannot be the right solution for the village.

Attached documents:

Comment: MM41 - LPMM18/2484  Respondent: Sylvia Pyne 15138433  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The changes to the A3 will make things even worse for Send with the traffic from the above developments coming straight through the village to Woking. This will mean unacceptable pollution, which has been increasing over the years and which I find is already causing more breathing problems for me as an asthmatic living on Send Road, so what it will do to children walking to school along Send Road and Send Barnes Lane with increasing nitrogen dioxide pollution exacerbated by the delays and gridlock it will cause. We are supposed to be encouraging more children to walk and this will only give parents an excuse to use their cars even more, and who could blame them.

More consideration should be given to the siting of additional housing elsewhere, as we are bearing an unacceptably large proportion of the new housing and development in the Guildford area, which should be spread more evenly through the villages etc. It appears we are getting about 50% of all development in the next 5 years, which can’t be right. For this reason I feel I have no other alternative but to object strongly to the enlarged burden which we are now being asked to bear, and it seems every time we object we are just given more development as our reward.

Attached documents:

Comment: MM42 - LPMM18/2480  Respondent: Sylvia Pyne 15138433  Agent:

MM42 Land at Burnt Common, London Road, Send Policy A58

The objection I have to this policy is that the increase from 7000 to a minimum of 14,800 sq m of industrial storage is the vast increase on what is Green Belt and when there is capacity at Slyfield. This is not special circumstances so contradicts MM9. We seem to be unfairly treated, especially as Send Business Centre is being increased 25%. Send seems to be expected to accommodate far more industrial area than any other village and it will gridlock the roads and make pollution levels far exceed what is reasonable for a Green Belt village which is supposed to be part of the lungs of London.

Attached documents:
Comment: MM42 - LPMM18/2485  Respondent: Sylvia Pyne 15138433  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The changes to the A3 will make things even worse for Send with the traffic from the above developments coming straight through the village to Woking. This will mean unacceptable pollution, which has been increasing over the years and which I find is already causing more breathing problems for me as an asthmatic living on Send Road, so what it will do to children walking to school along Send Road and Send Barnes Lane with increasing nitrogen dioxide pollution exacerbated by the delays and gridlock it will cause. We are supposed to be encouraging more children to walk and this will only give parents an excuse to use their cars even more, and who could blame them.

More consideration should be given to the siting of additional housing elsewhere, as we are bearing an unacceptably large proportion of the new housing and development in the Guildford area, which should be spread more evenly through the villages etc. It appears we are getting about 50% of all development in the next 5 years, which can’t be right. For this reason I feel I have no other alternative but to object strongly to the enlarged burden which we are now being asked to bear, and it seems every time we object we are just given more development as our reward.

Attached documents:

Comment: MM44 - LPMM18/2481  Respondent: Sylvia Pyne 15138433  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

This is a new site for 120 Homes including some self-build. This is a reinstatement despite earlier objections and will again impact on the surrounding area and the road, which is often congested and will bring even more traffic down to the traffic lights at the Send Crossroads. Add this to the Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) and we have 770 more houses all using this crossing and a 45% increase is not going to be easy to cope with and will cause even further reduction in traffic moving freely during the rush hour and other parts of the day. It is for this reason I object.

Attached documents:

Comment: MM48 - LPMM18/2486  Respondent: Sylvia Pyne 15138433  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The changes to the A3 will make things even worse for Send with the traffic from the above developments coming straight through the village to Woking. This will mean unacceptable pollution, which has been increasing over the years and which I find is already causing more breathing problems for me as an asthmatic living on Send Road, so what it will do to children walking to school along Send Road and Send Barnes Lane with increasing nitrogen dioxide pollution exacerbated by the delays and gridlock it will cause. We are supposed to be encouraging more children to walk and this will only give parents an excuse to use their cars even more, and who could blame them.

More consideration should be given to the siting of additional housing elsewhere, as we are bearing an unacceptably large proportion of the new housing and development in the Guildford area, which should be spread more evenly through the villages etc. It appears we are getting about 50% of all development in the next 5 years, which can’t be right. For this reason I feel I have no other alternative but to object strongly to the enlarged burden which we are now being asked to bear, and it seems every time we object we are just given more development as our reward.
MM9 Green Belt Policy

Your “modifications” claim to protect the Green Belt but the exception for “limited infilling outside the identified settlement boundaries but where you consider it “within the village” takes away the Green Belt protection and leaves Send open to exploitation and is totally unfair given we already seem to be being sacrificed for the rest of the Guilford area plans for more housing and industrial development and major road junctions. I object and feel we will be the victims of developers and speculators if this is passed.

Comment: MM9 - LPMM18/2482  Respondent: Sylvia Pyne 15138433  Agent:

Attached documents:

Comment: MM27 - LPMM18/122  Respondent: none (Mr. Jeffrey Greenwood) 15140417  Agent:

I object to this

Attached documents:

Comment: MM41 - LPMM18/103  Respondent: none (Mr. Jeffrey Greenwood) 15140417  Agent:

I object strongly to this development on the grounds of the Parish can't support the extra burden.

Attached documents:

Comment: MM41 - LPMM18/111  Respondent: none (Mr. Jeffrey Greenwood) 15140417  Agent:

I object to this developement

Attached documents:

Comment: MM42 - LPMM18/107  Respondent: none (Mr. Jeffrey Greenwood) 15140417  Agent:

I object to this developement

Attached documents:
Comment: MM44 - LPMM18/118  Respondent: none (Mr. Jeffrey Greenwood) 15140417  Agent:

I object to this development

Attached documents:

Comment: MM27 - LPMM18/511  Respondent: Bav Majithia 15141633  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/507  Respondent: Bav Majithia 15141633  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The increase from 400 to 550 homes of which 450 to be built in the first five years

- It is Green Belt containing ancient woodland
- An increase of 37% in the number of houses proposed is excessive
- 7000 ejections to the previous lower number have been ignored
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

Comment: MM41 - LPMM18/512  Respondent: Bav Majithia 15141633  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:
MM42 Land at Burnt Common, London Road, Send, Policy A58

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerously high.

Attached documents:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July.
- It is a Green Belt site with no special circumstances so it also contradicts Policy MM9.
- It will detract from the heritage buildings at Send Marsh Green.
- The additional traffic will increase pressure on the Send Crossroads.
- With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:
MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/510  Respondent: Bav Majithia 15141633  Agent:

MM9 Green Belt Policy

Although the ‘modifications’ claim to protect the Green Belt except in very special circumstances GBC make an exception for ‘limited infilling outside of the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents and the environment.

Attached documents:

Comment: Other comments - LPMM18/515  Respondent: Bav Majithia 15141633  Agent:

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM27 - LPMM18/4787  Respondent: Paulina Adair 15142977  Agent:

I object to MM27, MM41, MM42, MM48 - there is no way to introduce the amount of traffic you are proposing into the area!

Attached documents:

Comment: MM41 - LPMM18/4783  Respondent: Paulina Adair 15142977  Agent:
I would like to submit my objections to the proposed changes in the Local Plan.

We, the residents of Send, have objected to the previous plan and the Planning Policy team has increased the amount of both commercial and residential development.

I object to MM41 - the land contains the ancient woodland, is prone to flooding and the infrastructure will not be able to cope with the amount of traffic!

I object to MM27, MM41, MM42, MM48 - there is no way to introduce the amount of traffic you are proposing into the area!

Attached documents:

**Comment:** MM42 - LPMM18/4784  **Respondent:** Paulina Adair 15142977  **Agent:**

I object to MM42 - there is no evidence to support the demand for industrial land in the area and further more on the land which is a part of the Green Belt!

I object to MM27, MM41, MM42, MM48 - there is no way to introduce the amount of traffic you are proposing into the area!

Attached documents:

**Comment:** MM44 - LPMM18/4785  **Respondent:** Paulina Adair 15142977  **Agent:**

I object to MM44 - this is another Green Belt area and there are no special circumstances to justify the build of some many houses!

Attached documents:

**Comment:** MM48 - LPMM18/4788  **Respondent:** Paulina Adair 15142977  **Agent:**

I object to MM27, MM41, MM42, MM48 - there is no way to introduce the amount of traffic you are proposing into the area!

Attached documents:

**Comment:** MM9 - LPMM18/4786  **Respondent:** Paulina Adair 15142977  **Agent:**

I object to MM9 - which is meant to protect the Green Belt but to me it does the opposite!
I would like to appeal to the planners to take all the objections from the local residents into consideration when approving the final plan. Many thanks.

GBC has completely ignored all of the numerous objections it received during the last consultation. This I find insulting and very disappointing and I wish the following objections to be noted and a copy of this letter to be brought to the attention of the Government's Planning Inspectorate.

MM41 Garlick's Arch Policy A43.

I object to the increase in the proposed dwellings from 400 to 550 plus 2 travellers sites.

- How would the occupancy of these plots and the flow of equipment to and from the plots be monitored.
- HGVs would be required to move large equipment thus contributing to the existing traffic problems.
- Building on this land would result in over development with no damarcation between villages thus defeating the purpose of the Green Belt.
- This area is subject to flooding with flood zone 2 status.
- It is contaminated by lead shot arising from shooting clubs, accumulated over many years.
- It contains beautiful ancient woodland, the destruction of which would be a tragedy for the area and wild life.
- The existence of high voltage pylons across this land has been ignored. These will provide a serious Health and Safety risk to occupants of the Traveller sites when they move equipment. This area is blighted with illegal traveller intrusions.. Encouraging more will open up new opportunities for them when the site is vacant. Will we be asked to clean up after them as regularly happens here?

GBC are trustees of the Green Belt but appear to be happy eradicate this area to satisfy Government demands and quotas. They are ignoring local concerns and punishing us for raising legitimate concerns. Democracy only seems to work for this government and its cohorts when it concerns Brexit. When will you listen to us?.

I object to the number of homes (12,426) to be delivered by GBC over a 20 year period.
• The infrastructure is not in place to support this number of homes.
• It would put unimaginable pressure on road capacity, schools, doctors' surgeries, hospitals, and police. This proposal would mean an increase in population of 41% which is totally unacceptable as the existing local road systems are already unsafe and not fit for purpose.
• Cycling along the narrow and winding roads or walking on the pavements is already hazardous. I do wonder if any councillor has tried walking or riding along the present roads. To widen the roads in the designated areas would mean knocking down existing homes.

Attached documents:

Comment: MM42 - LPMM18/2154  Respondent: Vincent Francois 15145057  Agent:

New Policy A58: Industrial Space around Burnt Common

I object to GBC's proposal to build 14,000sq.m. employment space (light industrial/storage, warehousing) on virgin Green Belt around Send/Send Marsh/Burnt Common

• This construction would remove vast areas of Green Belt open space /50% increase
• The policy seeks to increase the area of land to be extracted from the Green Belt for a minimum of 14,000sq.m of 'employment floorspace'
• The word minimum used leaves the door open for future development
• There would be a very severe and adverse environmental impact not only on the two villages, but throughout the whole surrounding area, overdeveloping the local rural communities and creating major traffic problems with its subsequent noise and air pollution. We chose to live in this area to minimise our exposure to these sources of pollution. I am truly saddened by the effects this will have on the young generation growing up here.

Instead of spreading the load to cause minimum disruption, it would appear that GBC seems to be biased against this area as it has decided to dump ~40% of its plan in one spot putting great strain on the existing facilities and residents. We are at the extreme end of the Borough and from our standpoint the councillors have decided on a solution that disrupts, overwhelsms and annoys its existing residents. By disregarding the numerous objections sent to GBC it is demonstrating the bully tactics of government representatives. If this is how democracy should work.

Attached documents:

Comment: MM41 - LPMM18/2148  Respondent: Irene Francois 15145121  Agent:

Re: GBC Local Plan Amendments 2018

I object to the new set of proposals for the following reasons:

MM41 Policy A43 - Garlick's Arch - The increase from 400 homes to 550 homes on this green and agricultural land, which will destroy ancient woodland and in the process removing wild life habitat, is a ludicrous and irresponsible proposal. The number equates to a total increase of 37%, which is too much of an increase for one area. The present infrastructure (hospitals, medical centres, shops, parking, schools, leisure and social care facilities) cannot sustain this increase. Plug the resultant increase in vehicle numbers will cause traffic congestion and delays resulting in total gridlock.

To date, GBC has done nothing regarding the implementation of noise abatement measures on the A3 and on Clandon Road. Nor has it introduced any workable speed calming measures. Exiting either left or right from 'Woodlands' onto the Clandon Road can take up to 4 minutes as the traffic is travelling well above the speed limit. So would GBC please explain how it intends to cope with an even greater volume of vehicles.
If the addition, if two more slip-roads to and from the A3 and the A247 (Clandon Road) go ahead there will be a detrimental impact on road traffic and road safety. There is little room, as it stands, on Send Road leading to Woking for two way traffic as resident's cars are parked on either side of the road leaving a very narrow space for cars and vans to pass one another. Also Clandon Road is narrow and winding and already operating at full capacity. These roads are dangerous to pedestrians, cyclists, and for drivers exiting from side roads. I assume the council used consultants to aid them in drawing up the plan? Did they drive around Clandon, Ripley, Send and Send Marsh? I doubt it.

In my profession (medical research) the definition of a "consultation" involves taking account of, as well as, listening to the views of interested parties and experts before decisions are made. Since the planning Inspector obviously concurred with the original GBC plan one can only assume that the previous consultation was merely a pretense. Certainly this plan was not viewed with objectivity. The Inspector and GBC have treated the existing residents in this area with contempt. If they had treated us with respect and listened surely some compromises would have been made? Otherwise how can thousands of valid objections be ignored? The existing infrastructure and road network cannot sustain these development proposals. If this plan is allowed to go through it will be laying the foundations for future problems on the highways, education, healthcare quality of life, and be detrimental to the local economy. Thus, I believe this revised plan is not fit for purpose.

MM42 - Industrial Space on Land around Burnt Common, London Road. This new policy seeks to increase the area of Green Belt land to be sacrificed for additional light industry and warehousing. GBC now proposes a minimum of 14,000 sq m of employment floor space. This amounts to a 50% increase which is totally unacceptable. The additional traffic, including HGVs, will impact greatly on the road network, including the very busy A3. Furthermore, the roads around Send, Ripley, Clandon and Burnt Common are narrow and winding. Congestion will result in an increase in air pollution that includes toxic carbon monoxide, carbon dioxide, nitrogen dioxide and particulates. It has been recognised, at last, by the Government that when HGVs and cars are in idling mode there will be a two-fold increase in the levels of pollutants. Also heavy traffic near schools and bus stops has been shown to have a detrimental effect on children's health.

MM5 Policy I object to the addition of more Traveler plots which would result in an increased of vans and caravans on the roads. GBC is proposing a disproportionate number of show people/travelers sites in the Send, Send Marsh and Burnt Common area.
Comment: MM41 - LPMM18/2303  Respondent: E J M Symonds 15146945  Agent:

I am very saddened to see that once again Send is being over loaded with an increased number of houses, many on Green Belt, despite the thousands of protestations from villagers concerned about their village.

I am also aware the figures G.B.C Inspector used was 789 houses per year, whereas a later consultant said that 460 should be the appropriate growth as referred to in POLICY S2 which would make a huge difference locally.

MM41 Land at Garlick's Arch. Policy A43

This is ancient woodland [unreadable text] Green Belt. Why now the increase of 150 homes? Our school and surgery already at full capacity.

Attached documents:

Comment: MM42 - LPMM18/2304  Respondent: E J M Symonds 15146945  Agent:

MM42 Land at Burnt Common. Policy A58

Why do we as a Village need a large industrial site! Guildford only 10 mins. away and our local roads are ill equipped to deal with massive delivery lorries.

Attached documents:

Comment: MM44 - LPMM18/2305  Respondent: E J M Symonds 15146945  Agent:

MM44 Land at Aldertons Farm. Policy A63

This site was deleted from the earlier draft because of all the objections, but now 120 houses are planned on this site. It is perfectly clear that the G.B.C does not take into account the feelings of Send residents when they learn they are about to be inundated with thousands more people & cars.

Attached documents:

Comment: MM41 - LPMM18/428  Respondent: Dr Christopher Slinn 15153569  Agent:

Garlick Arch(550), Clockbarn (60), Winds Ridge (40) make 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure - roads, school and doctors. Note the recent closure of Ripley school compounds the madness of local planning.

There are 40 villages in Surrey, the burden has not been shared proportionally.
There is a need for housing nationally, but disproportionate development in the South East, although I realise government policy is outside your remit.

This excessive development is turning a village into an urban sprawl, contrary to Green Belt Policy.

**Attached documents:**

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**Comment: MM42 - LPMM18/429  Respondent: Dr Christopher Slinn 15153569  Agent:**

There is no need to destroy the Green Belt whilst Slyfield has unused capacity.

The economy is bound to turn down after Brexit.

**Attached documents:**

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**Comment: MM44 - LPMM18/431  Respondent: Dr Christopher Slinn 15153569  Agent:**

It is excessive to have both this and Garlicks Arch. One or the other would be more reasonable. Both together, with Clockbarn and Winds Ridge make a 45% increase in the number of homes. This makes a mockery of the Green Belt and turns our village into an urban sprawl with Ripley.

**Attached documents:**

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**Comment: MM45 - LPMM18/736  Respondent: Mrs Margaret Dodson 15157473  Agent:**

These proposals amount to over development. The village will cease to be a community. The infrastructure is not equipped for a development of this scale.

**Attached documents:**

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**Comment: MM45 - LPMM18/2  Respondent: Mr Stephen Callender 15162625  Agent:**

This comment relates to MM45.

Based on the 2011 census, there was an average of 2.43 inhabitants per household and 1.5 cars. If the latter is increased by the increase in vehicle numbers licensed in the UK between 2011 and 2017 (c10%) this means 1.65 cars per household. Therefore 105 homes would result in 255 extra people and 173 cars.

I am not arguing against building these houses, but there are two issues that I believe need to be dealt with prior to approval to build:
1. **Road infrastructure**  As currently laid out, the junction of the B3000 with the A31 already leads to very long tailbacks at many times of day, not just at rush hour. Currently traffic can queue up Wanborough Hill, on both slip roads from the A31, and particularly along the B3000 past Puttenham - sometimes as far back as the A3 junction. There are also often lengthy queues, especially at rush hour, at the junctions of Westwood Lane and Glaziers Lane with the A323. To knowingly add yet more traffic prior to solving traffic flow issues will simply add significantly to the current queues which in turn leads to wasted fuel, wasted time and driver frustration. Traffic management experts need to be tasked with finding solutions especially at the Southern end of this particular road network before planning permission is granted.

2. **Medical services**  Can the Fairlands medical practice cope with an extra 255 people? If not, where can these new people go for GP treatment?

Finally, is the area concerned not regularly under water? Assuming suitable drainage is put in place, where will this water end up? How will it be diverted to run into those existing water courses that can cope with the extra flow?

**Attached documents:**

**Comment: MM45 - LPMM18/735  Respondent: Mrs Mary Adkins 15173313  Agent:**

The land between Glaziers Lane and Strawberry Farm currently provides a green buffer between the essentially linear development of Glaziers Lane and Normandy. The building of 105 houses would remove that buffer to create suburban sprawl between the two communities. The site is locked in by a railway line to one side, with farmland and housing on two other sides. The only possible access is into Glaziers Lane. The proposed modification to the plan would significantly increase traffic on Glaziers, Flexford and Westwood Lanes.

A proposed Green Belt site on the other side of Glaziers Lane was included in the original draft plan and removed as inappropriate. The arguments against that site stand for the current site at Strawberry Farm.

The site is subject to flooding and a large proportion is currently occupied by a lake.

**Attached documents:**

**Comment: MM41 - LPMM18/244  Respondent: Mrs Avril Ann Dawson 15176193  Agent:**

I am concerned at the number of homes 550 homes planned to be built because the land being planned to be used is subject to frequent flooding. The new development will join up Send and Ripley and destroy two lovely villages with over development. The extra cars estimated at 800 will block up the local roads which are narrow and twisting. I live on Potters Lane and the plans to build more houses with more people coming in and out of the area in their cars will add to the difficulty in driving in Potters Lane and slow down travel in and out of the village. Currently Potters Lane can be driven down from an exit point on the A3 and it can be hard to drive down this road with cars parked at the kerbside and great care has to be taken crossing the road already so with extra traffic use the problems will get worse. The safety of villagers should be an important factor in planning new housing in the area.

Medical facilities are already well used in Send. I have to have regular check ups with a doctor and have found that for these non urgent appointments I book myself in and find the first available appointment is three to four weeks away. This is will become a bigger problem and I will have to wait longer for an appointment as use of the medical facilities increases with more people living in the area.

**Attached documents:**
Comment: MM42 - LPMM18/245  Respondent: Mrs Avril Ann Dawson 15176193  Agent:

This allocation for industrial and storage has been increased to 14,800 and there is no need to put this new industrial site in the Greenbelt. Already the number of homes with For Sale signs outside in the Burnt Common area has increased. I counted 4 For Sale signs visible from the main road after the Ripley - A3 roundabout. People do not want to live in a village with plans for such a large increase in land allocated to industrial land and storage. The plans state this is on top of the 25% at Send Business Centre and so this becomes too much for our current road infrastructure. Slyfield Business and Industrial area has unused capacity. There are no special circumstances and so this new plan contradicts MM9.

Attached documents:

Comment: MM41 - LPMM18/452  Respondent: Stephen Brunskill 15177313  Agent:

I wish to object to the revised local plan. The original plan was unfair and inappropriate for Send village and I feel particularly offended that the revised plan proposes even more development. It feels like a clumsy tactic to enable you to be seen to compromise back to the (excessive) levels proposed in the original plan. The proposed level of development puts a completely disproportionate burden on Send/Sendmarsh for the borough’s building needs.

In particular I Object to:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

This excessive development is within greenbelt and will effectively link Send/Sendmarsh and Ripley together. The area in question, apart from containing ancient woodland also floods regularly. The clue is in the name – Sendmarsh! A development of this size will also add c800 cars to the already busy roads. The junction of Sendmarsh Road and Portsmouth road is already very difficult to exit but having the entrance to this enormous development within a few hundred yards will cause ongoing chaos on the roads.

Attached documents:

Comment: MM42 - LPMM18/453  Respondent: Stephen Brunskill 15177313  Agent:

MM42 Land at Burnt Common, London road, Send, Policy A58

This is a completely inappropriate proposal. There has been no evidence produced anywhere supporting a demand for such a large industrial site being built in the greenbelt. Slyfield has unused capacity and actively wants further development there. The narrow local roads are not designed for the influx of large articulated lorries that this development will bring. The A3 at this point is called the Ripley bypass, with these developments there will be the real need for an additional Ripley bypass as hundreds of lorries and cars use Portsmouth Road and Ripley to access the A3.

Attached documents:

Comment: MM44 - LPMM18/454  Respondent: Stephen Brunskill 15177313  Agent:
MM44 Land at Alderton’s farm, Sendmarsh Road Policy A63

This proposal was already rejected from earlier drafts because of the huge number of objections. Again this is greenbelt and there are no special circumstances to build here and it contradicts policy MM9. There are existing pinch points on Sendmarsh Road which makes it awkward for cars to pass each other, adding hundreds of cars from this development will put undue pressure on the immediate road network. Also as at Garlicks Arch (MM41) this area regularly floods – that’s why it’s called Sendmarsh, this area is “marshy”.

Guildford Borough Council are not representing the residents of Send and are treating us with contempt. This plan puts a massively unfair burden on the village of Send to support the borough wide housing and development need.

Attached documents:

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**Comment: MM41 - LPMM18/640**  **Respondent: John Harris 15180001**  **Agent:**

I would like to object to the large increase i the number of houses proposed in the Send area. Please find below my reasons for objection:

**MM41**

An increase in the number of house of 37%

Despite a large number of objection to the previous lower number this has been completely ignored.

It is green belt containing ancient woodland.

It will mean that the distinction between Send and Ripley will be lost.

The site has a know history of flooding.

A large number of extra cars will add to the already congested local roads.

With the closure of Ripley school where will all the extra children go as Send school is already full?

It is difficult to get an appointment at the Send Surgery so where will all the extra residents go for medical treatment?

Attached documents:

---

**Comment: MM42 - LPMM18/641**  **Respondent: John Harris 15180001**  **Agent:**

MM42

Having already been deleted from the 2014 plan this has increased twice doubling the size of the area.

The size of this industrial development is far to large for a smell village.

Why not put in Slyfield which has unused capacity rather than in green belt.

Where is the demand for this industrial development?
Already gridlocked local roads will become unuseable.

**Comment:** MM44 - LPMM18/642  **Respondent:** John Harris 15180001  **Agent:**

**MM44**

Why has this been reinserted after being removed earlier due to local objections?

This is green belt with no special circumstances so contradicts policy MM9.

This will only add to the already heavy traffic using Send crossroads.

With the other developments this adds 770 houses to the 1700 currently in Send a 45% increase!!

**Attached documents:**

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**Comment:** MM41 - LPMM18/2855  **Respondent:** Paul Bedworth 15180193  **Agent:**

**Objection to proposed development in Send**

I am writing to object in the strongest possible terms to the proposed developments at:-

1. MM41 Garlicks Arch, Send March, policy A43
2. MM42 Burnt Common, London Road, Send, policy A58
3. MM44 Send Marsh Road, policy A63
4. Taking each in turn:-

**MM41 Garlicks Arch, Send March, policy A43**

1. While strong opposition existed to the original proposal for 400 homes, 550 are now on the plan. This 37% increase is disproportionate and ignores the 7,000+ objections that have already been lodged.
2. This site contains ancient woodland and is in the green belt.
3. The effect of it would be to join Ripley and Send and constitute over development.
4. The roads are already congested particularly around rush hour; this would add a further 800+ cars.
5. There would be a likely impact on ground water run-off caused by further development with an increased risk of flooding, in an area already susceptible.
6. Local infrastructure such as schools and GP practices could not cope and would need further investment.

**Attached documents:**

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**Comment:** MM42 - LPMM18/2856  **Respondent:** Paul Bedworth 15180193  **Agent:**
**MM42 Burnt Common, London Road, Send, policy A58**

1. The increase from 7000sq m to a minimum of 14,800sq m of industrial / storage would make this the largest industrial site allocation in the borough, and has happened despite its deletion from the 2014 plan. It is therefore illogical that this has been tabled.
2. Slyfield has unused space: it is therefore unnecessary to build on Green Belt.
3. There has been a reduction in demand for industrial land as per the Employment Land Needs Assessment.
4. No special circumstances exist and therefore this contradicts MM9.
5. This is on top of the 25% increase in the Send Business Centre making the burden on Send village disproportionate to that of any other village.
6. It will add to the instances of gridlock and boost already dangerously high nitrogen oxide levels.

**Attached documents:**

**Comment:** MM44 - LPMM18/2857 **Respondent:** Paul Bedworth 15180193  **Agent:**

**MM44 Alderton’s Farm, Send Marsh Road, policy A63**

1. Why is this back on the plan when it had been deleted from an earlier draft due to all the local objections: this will be a loss of Green Belt land with no special circumstances, in contravention to MM9.
2. The roads are already congested particularly around rush hour.
3. Local infrastructure could not cope and would need further investment.
4. There would be a likely impact on ground water run-off caused by further development with an increased risk of flooding
5. Other brown land sites should be thoroughly investigated and developed before encroaching on Green Belt.

Furthermore, within the context of the proposed wider development in Send Marsh, there seems to be no consideration within the documents of the impact on the village of the overall planning proposals of all the sites, which could see dwelling numbers increase by around 45%+

**Attached documents:**

**Comment:** MM41 - LPMM18/1447 **Respondent:** Muriel Millar 15184993  **Agent:**

Why has Send been chosen to carry these much increased quotas? They would all mean traffic chaos through the village. Rush hour is bad enough already.

All the Modifications violate MM9 itself.

**MM41 Garlicks Arch**

- Excessive numbers
- Green belt
- Traffic problems
Comment: MM42 - LPMM18/1448  Respondent: Muriel Millar 15184993  Agent:

MM42 Burnt Common

- Green Belt
- Traffic problems
- Unnecessary

Attached documents:

Comment: MM44 - LPMM18/1449  Respondent: Muriel Millar 15184993  Agent:

MM44 Aldertons Farm

- Green belt
- Traffic problems
- Inappropriate location

Attached documents:

Comment: MM9 - LPMM18/1446  Respondent: Muriel Millar 15184993  Agent:

Why has Send been chosen to carry these much increased quotas? They would all mean traffic chaos through the village. Rush hour is bad enough already.

All the Modifications violate MM9 itself.

MM41 Garlicks Arch

- Excessive numbers
- Green belt
- Traffic problems

MM42 Burnt Common

- Green Belt
Traffic problems
Unnecessary

MM44 Aldertons Farm

Green belt
Traffic problems
Inappropriate location

Attached documents:

Comment: MM27 - LPMM18/1526  Respondent: Suzannah Monk 15186273  Agent:

Finally, the MM27, MM41, MM42 and MM48 Transport Strategy

Changes to the A3 do not alter the narrow winding roads that lead off of the the main Send Road. These small roads are not designed for large numbers of cars and the risk of accidents will dramatically increase with more traffic on them.

Attached documents:

Comment: MM41 - LPMM18/1523  Respondent: Suzannah Monk 15186273  Agent:

I am writing to make a formal objection towards the modifications to sites and general policies towards the future of development in Send.

Where to start…

Firstly the MM41 Land in Garlick’s Arch, Send March.

A massive increase in proposed houses despite 7000 previous objections of up to 550 homes is not justifiable. There are many brownbelt areas around the country and in fill land that should be maximised and used up completely, before green belt land is built on as we will never get this land back. The roads are already over crowded and can’t take the increased levels of traffic that has massively increased over the 20 years that I have lived in Send. We will all turn up later to work or have to leave earlier, leaving less time for the things that really matter. We also need to protect our flood lands as best as possible as flooding is a natural process and the river needs to be able to flood without the risk of flooding housing further downstream.

Attached documents:

Comment: MM41 - LPMM18/1527  Respondent: Suzannah Monk 15186273  Agent:

Finally, the MM27, MM41, MM42 and MM48 Transport Strategy
Changes to the A3 do not alter the narrow winding roads that lead off of the main Send Road. These small roads are not designed for large numbers of cars and the risk of accidents will dramatically increase with more traffic on them.

Attached documents:

Secondly MM42 Land at Burnt Common.

Why build on Greenbelt when you can utilise unused industrial space at Slyfield. It’s really not that far away. Heavy goods vehicles will further block up the roads which are already chaos at rush hour. Therefore MAXIMISE the space we already have locally first. Use marketing strategies to make people aware of the space available already.

Thirdly, MM42 Land at Alderton’s Farm, Send March

Yet more houses to be built in Send March, yet more houses on green belt land. How many do you think the little village can take! This makes for a 45% increase in the total number of houses in Send. The local schools, hospitals and roads will not be able to handle it.

Attached documents:

Finally, the MM27, MM41, MM42 and MM48 Transport Strategy

Changes to the A3 do not alter the narrow winding roads that lead off of the main Send Road. These small roads are not designed for large numbers of cars and the risk of accidents will dramatically increase with more traffic on them.

Attached documents:

Finally, the MM27, MM41, MM42 and MM48 Transport Strategy

I invite you to really consider the proposed developments and try to come up with alternative and innovative solutions that extend outwards from the village of Send and even Surrey. It would be more advantageous to spread the load of new housing more evenly rather than completely changing the feel of Send and forcing many people who have been happily settled there over a number of years to have to move as it would no longer be the village they moved too and would become overcrowded and polluted.

Attached documents:
Fourthly, the MM9 Green belt policy.

If green belt land on the edge of Send starts to be used then this will be a catapult for further green belt on the edge of these new developments to be used in the future.

Attached documents:

It is with dismay that once again I find that Normandy is under threat from excessive development, this time by the submission of plans to change the Green Belt Boundary, enabling the development of the site A64 for housing. Apparently this site was belatedly included to make good the failure of Woking to provide its share of housing! How interesting to note that this particular site has already had planning refusals on the grounds of its extreme sensitivity and damage to the openness the Green Belt offers.

Normandy is a small village, of some 1300 houses. This proposal will increase the size of a delightful village by 7%, bringing with it horrendous traffic problems. Glaziers Lane (D60) is a narrow, minor road with a blind bend on a bridge crossing over the railway: an already dangerous layout but potentially deadly with an increased number of vehicle movements emerging onto Glaziers Lane at the site of A64, just yards from the bridge.

I OBJECT TO THIS PROPOSAL ON THE GROUNDS OF INADEQUATE ROAD INFRASTRUCTURE TO ACCOMMODATE INCREASED TRAFFIC MOVEMENTS

This village has already given up 32 acres of land, Manor Fruit Farm, to the detrimental impact on wildlife. Reduced numbers of gold-crests, linnets, owls and the destruction of the nightingale population are the result. More high density housing will destroy what wildlife remains: the foxes, the deer, the hedgehogs, the Badgers.

I OBJECT TO THE DEVELOPMENT PROPOSALS BECAUSE THIS VILLAGE HAS ALREADY LOST VALUABLE HABITATS FOR WILDLIFE AND BUILDING ON THIS SCALE WILL DESTROY, TOTALLY OBLITERATE, NATIVE SPECIES.

No mention has been made of any initiatives planned to deal with flooding which is already an issue within the village. This development will exacerbate an already intolerable situation.

I OBJECT TO THIS DEVELOPMENT PROPOSAL BECAUSE THE DRAFT PLAN OFFERS NO REMEDY TO THE ISSUES OF ROAD CONGESTION AND SAFETY, AND INFRASTRUCTURE.

Surrey University has skewed housing needs within the borough by not building sufficient 'on campus' student accommodation, resulting in several thousand houses being unavailable for the housing market. The university has a moral responsibility to provide accommodation for its students.

I OBJECT TO THE DRAFT PLAN DRAWN UP BY GUILDFORD BOROUGH COUNCIL FOR THE FOLLOWING
REASONS:
- The plan for the Normandy development is ill-conceived.
- Poor road infrastructure cannot accommodate increased vehicle movements, exacerbating safety.
- Land adjacent to A64 already has major flooding issues.
- Destruction of the rural environment is unacceptable.
- Normandy is indeed a sensitive site, and should be protected, for the benefit of all.

Attached documents:

Comment: MM45 - LPMM18/691  Respondent: Roger Banfield 15192289  Agent:

So having successfully fought off a proposal to swamp the village of Normandy with a massive building site; out of the blue comes something much smaller. But where have they chosen to site it? On a Green Belt land off a D road (Glaziers Lane) just yards from a tricky, narrow, bridge over the railway. It might be smaller proposal but even more dangerous! Of course making it smaller means that you can do away with any pretence of infrastructure, facilities etc. and just stick them in somewhere. Well you have certainly chosen a poor site.

This proposal should follow the previous one. I speak as a concerned resident of Normandy for 38 years.

Attached documents:

Comment: MM41 - LPMM18/1423  Respondent: Carrie Wheeler 15195969  Agent:

I have been a resident of Send Marsh for over 40 years. I love where I live and have no desire to move, but if all the planned building goes ahead, it will no longer be the place I love and call home!

I would like to strongly object to the planning applications listed below for the following reasons:

MM41 - The land at Garlick's Arch Send Marsh

The proposals rather than decreasing, after the thousands of local objections, have unbelievably been increased! This will destroy local green belt land and ancient woodland. It will morph Send and Ripley into one mass development. There is also a risk to human well being constructing housing on this site, as it is prone to flooding and is also contaminated with lead shot!

The additional traffic on an already busy road system, will be impossible and the pressure on the Villagers Medical practice will be unsustainable, local schools which at present are under huge pressure due to the closure of a local school in Ripley will be beyond bursting point, all in all the infrastructure cannot cope with such a huge addition!

Attached documents:

Comment: MM42 - LPMM18/1425  Respondent: Carrie Wheeler 15195969  Agent:

MM42 Land at Burnt Common Policy A58
The suggested industrial and storage site has been doubled in size which makes it the largest planned industrial site in the borough! WHY!

Slyfield Green is an up and running, successful industrial area, which at present is not running at full capacity, surely it would be more sensible to use the vacant space there, than clog up the roads around Burnt Common, Send and Ripley, with heavy haulage lorries and vans, which will cause major wear and tear on our local roads, and damage the health of the residents with their noxious fumes.

Attached documents:

**Comment:** MM44 - LPMM18/1426  **Respondent:** Carrie Wheeler 15195969  **Agent:**

MM44 Aldertons Farm

This is Green Belt land! Having been deleted from the local plan, it has now been re-instated, which contradicts the policies in MM9 (Green Belt Policy) As with the other proposals this will also put pressure on local roads and services. It creates an increased risk of traffic accidents, stressful journeys, which also creates a risk of affecting the general health and well being of the long suffering local residents.

Where does it all end? If Green belt land is no longer just that, we will eventually have no open space!

Send and Ripley are charming old established villages, the local planners are potentially going to spoil this pretty area, by turning it into a concrete jungle, full of unhealthy residents, squashed and gridlocked, due to the greed and lack of foresight of the developers.

Please, please, listen to our objections, we live here so are more aware of the damage and destruction your proposed plans will cause. Don't have the legacy of causing such mayhem on your conscience!

Attached documents:

**Comment:** MM2 - LPMM18/4228  **Respondent:** Michael Corlett 15196161  **Agent:**

I object to the revised local plan on the following grounds. It has increased from 400 to to 550 homes an increase of 37% to be built in Send. The revised forecast for Guildford has been reduced by 45% by the office of National Statistics. I am also lead to believe the inspector visited Send at the end of August during a holiday period when the schools were on holiday as were many residents, therefore he did not witness the congestion on the roads that exist between the hours of to 9.30 am and 5 to 6.30 pm. It is imperative that a highways report and feasibility study is made and published before any further development is permitted. Send and Ripley are already at saturation point traffic wise. Another problem is the strain on existing schools and medical services which are at full capacity now.

Attached documents:

**Comment:** MM27 - LPMM18/4234  **Respondent:** Michael Corlett 15196161  **Agent:**
Transport Strategy.
There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times.

Attached documents:

Comment: MM41 - LPMM18/4229  Respondent: Michael Corlett 15196161  Agent:

MM41 Land at Garlicks Arch  Policy A43
Previous objections have not been considered that this land floods and pictorial evidence was provided. It is Green Belt containing an ancient woodland and the impact on the adjacent roads would be impossible.

Attached documents:

Comment: MM41 - LPMM18/4235  Respondent: Michael Corlett 15196161  Agent:

There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times.

Attached documents:

Comment: MM42 - LPMM18/4230  Respondent: Michael Corlett 15196161  Agent:

MM42  Burnt Common. Policy A58
This site is not required as there is unused capacity at  Slyfield and this is Green Belt. This contradicts MM9 Again this would generate more unsustainable traffic.

Attached documents:

Comment: MM42 - LPMM18/4236  Respondent: Michael Corlett 15196161  Agent:

There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times.
**Comment: MM44 - LPMM18/4232  Respondent: Michael Corlett 15196161  Agent:**

MM44. Alderton's Farm. Policy A63
This is Green Belt with no exceptional circumstances and the additional traffic it would produce would, again, put too much pressure on already congested roads at peak times.

**Attached documents:**

| Comment: MM48 - LPMM18/4237  Respondent: Michael Corlett 15196161  Agent: |
| MM27. MM41. MM42. MM48. Transport Strategy. There are no definite plans laid out and it is impossible to widen Send Road or the Clandon Road to accommodate the increase in traffic approaching or returning from the A3. These are narrow roads in many places and the traffic is already at a standstill at peak times. A full assessment must be made and published and I ask the inspector to revisit at peak times. |

**Attached documents:**

| Comment: MM5 - LPMM18/4233  Respondent: Michael Corlett 15196161  Agent: |
| MM5 Travellers Site Ref A44. Send Hill
This Site is totally unsuitable for travellers or any development. It is contaminated land as it was a dump for toxic waste and also Send Hill is only single file in both direction with a very narrow approach on a steep hill to a dangerous blind junction on to Potters Lane. Trailers and caravans would not be able to negotiate the narrow lane.

A42 Send Hill. Development of 40 houses.
This is the adjacent site to MM5 and is unsuitable for the same reason. The traffic at peak school times is already very dangerous by the Send Road traffic lights with cars dropping off children, making it a single access. Send Hill at the Potters Lane end is single track and could not take the additional traffic as there are no passing places. |

**Attached documents:**

| Comment: MM9 - LPMM18/4231  Respondent: Michael Corlett 15196161  Agent: |
| MM9. Green Belt Policy
This should be sacrosanct and there should be no exceptional circumstances. |

**Attached documents:**
Comment: MM41 - LPMM18/655  Respondent: Louise Harris 15197345  Agent:

I would like to object to the large increase in the number of houses proposed in the Send area. Please find below my reasons for objection:

MM41

An increase in the number of house of 37%

Despite a large number of objection to the previous lower number this has been completely ignored.

It is green belt containing ancient woodland.

It will mean that the distinction between Send and Ripley will be lost.

The site has a known history of flooding.

A large number of extra cars will add to the already congested local roads.

With the closure of Ripley school where will all the extra children go as Send school is already full?

It is difficult to get an appointment at the Send Surgery so where will all the extra residents go for medical treatment?

Attached documents:

Comment: MM42 - LPMM18/656  Respondent: Louise Harris 15197345  Agent:

MM42

Having already been deleted from the 2014 plan this has increased twice doubling the size of the area.

The size of this industrial development is far to large for a smell village.

Why not put in Slyfield which has unused capacity rather than in green belt.

Where is the demand for this industrial development?

Already gridlocked local roads will become unusable.

Attached documents:

Comment: MM44 - LPMM18/657  Respondent: Louise Harris 15197345  Agent:

MM44

Why has this been reinserted after being removed earlier due to local objections?

This is green belt with no special circumstances so contradicts policy MM9.
This will only add to the already heavy traffic using Send crossroads.

With the other developments this adds 770 houses to the 1700 currently in Send a 45% increase!!

Attached documents:

**Comment: MM27 - LPMM18/1067  Respondent: Elizabeth Howlett 15205921  Agent:**

Transport strategy MM27, MM41, MM42, MM48

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.

The road network is in desperate need of a major maintenance programme. In Send the surface at the traffic light intersection has completely broken up with holes appearing in all approaches. This non slip surface has broken down, wasted money, poor design. Or too much traffic?

The bridge over the A3 on the Clandon road has had the road surface pushed into the kerb resulting in large undulations that force motorists into the middle of the road.

Priority should be given to getting existing roads into a reasonable condition over the building new developments that will only increase traffic and make the matters worse. Most roads in the areas have kerb stones, and service covers dislodged and numerous potholes.

Who decides what a reasonable time is to queue on the roads into and out of Guildford and Woking getting to and from work. What is the environmental impact of thousands of cars, Lorries and busses queuing every morning and evening polluting the atmosphere, wasting fuel and residents and commuter’s time?

Attached documents:

**Comment: MM41 - LPMM18/1068  Respondent: Elizabeth Howlett 15205921  Agent:**

Transport strategy MM27, MM41, MM42, MM48

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.

The road network is in desperate need of a major maintenance programme. In Send the surface at the traffic light intersection has completely broken up with holes appearing in all approaches. This non slip surface has broken down, wasted money, poor design. Or too much traffic?

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Who decides what a reasonable time is to queue on the roads into and out of Guildford and Woking getting to and from work. What is the environmental impact of thousands of cars, Lorries and busses queuing every morning and evening polluting the atmosphere, wasting fuel and residents and commuter’s time?

Attached documents:

Comment: MM41 - LPMM18/1073  Respondent: Elizabeth Howlett 15205921  Agent:

M41 Garlick's Arch

This development has no immediate affect on where we live, but will bring additional traffic to the area. As it is a remote development I have yet to see anyone addressing the problem of supplying new infrastructure, ( mains services, schools, medical facilities, etc.), to this project and who will bear the costs. Will it fall on local taxpayers to put in the required infrastructure.

The A3/M25 interchange is already congested on and off every morning,

At least new residents will be able to access the main supermarkets up and down the A3 in Guildford, Brooklands and Cobham, but only will further increase congestion on the A3.

I confirm that I have a general objection to these proposals and specific objections to the modifications, which I do not consider as minor, MM9, MM27, MM41, MM42, MM44, and MM48

Attached documents:

Comment: MM42 - LPMM18/1069  Respondent: Elizabeth Howlett 15205921  Agent:

Transport strategy MM27, MM41, MM42, MM48

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.

The road network is in desperate need of a major maintenance programme. In Send the surface at the traffic light intersection has completely broken up with holes appearing in all approaches. This non slip surface has broken down, wasted money, poor design. Or too much traffic?

The bridge over the A3 on the Clandon road has had the road surface pushed into the kerb resulting in large undulations that force motorists into the middle of the road.

Priority should be given to getting existing roads into a reasonable condition over the building new developments that will only increase traffic and make the matters worse. Most roads in the areas have kerb stones, and service covers dislodged and numerous potholes.

Who decides what a reasonable time is to queue on the roads into and out of Guildford and Woking getting to and from work. What is the environmental impact of thousands of cars, Lorries and busses queuing every morning and evening polluting the atmosphere, wasting fuel and residents and commuter’s time?

Attached documents:
**Comment: MM44 - LPMM18/1071  Respondent: Elizabeth Howlett 15205921  Agent:**

**MM44 Alderton's farm**

This option was deleted in the original plan after local objection, but has been reinstated without justification. There are no special reasons that have identified from the original decision.

Access onto the rat run will only make the route more dangerous around the green where the sight lines are already insufficient for the traffic that uses it at present without adding further traffic.

Together with Garlic’s arch this increases the house density in Send by some 45%.

Much of this development is in an area designated as flood plane. I recall that Council houses built in a flood plane near Guildford were flooded out resulting in huge repair, flood defence and compensation costs. Wasting taxpayers’ money. Stop building on flood planes.

**Attached documents:**

**Comment: MM44 - LPMM18/1072  Respondent: Elizabeth Howlett 15205921  Agent:**

**MM44 Burnt Common industrial development**

There is no case made for additional industrial land. Existing premises on the Portsmouth road remain undeveloped. The existing level of development is being abused with cars parked on the road over the cycle lanes. The river at the end of the A3 slip road already floods closing the road for extended periods during heavy rainfall. The roundabout at Burnt common is overloaded at peak times. It is clear that industrial developments in Guildford are underdeveloped and if developed would offer jobs for local residents without having to travel out of town. There is no need for more job opportunities in the area.

**Attached documents:**

**Comment: MM48 - LPMM18/1070  Respondent: Elizabeth Howlett 15205921  Agent:**

**Transport strategy MM27, MM41, MM42, MM48**

The proposed developments will add to the already overcrowded roads, where journeys take far longer than necessary. Most residents now have to factor in the probability that there will be delays.

The road network is in desperate need of a major maintenance programme. In Send the surface at the traffic light intersection has completely broken up with holes appearing in all approaches. This non slip surface has broken down, wasted money, poor design. Or too much traffic?

The bridge over the A3 on the Clandon road has had the road surface pushed into the kerb resulting in large undulations that force motorists into the middle of the road.
Priority should be given to getting existing roads into a reasonable condition over the building new developments that will only increase traffic and make the matters worse. Most roads in the areas have kerb stones, and service covers dislodged and numerous potholes.

Who decides what a reasonable time is to queue on the roads into and out of Guildford and Woking getting to and from work. What is the environmental impact of thousands of cars, Lorries and busses queuing every morning and evening polluting the atmosphere, wasting fuel and residents and commuter’s time?

Attached documents:

Comment: MM9 - LPMM18/1066  Respondent: Elizabeth Howlett 15205921  Agent:

I wish to object to the Local Plan both in general and specifically to Main Modifications MM9, MM7, MM41, MM42 and MM44.

My general objection is that the proposed modifications to the Local Plan are unjustified. Has anyone considered what the limit is on continued development? At what stage will we be full up? That is: ‘When does the built environment take precedence over the remaining green belt’.

When will the road infrastructure no longer be sufficient to serve all those living in the Guildford area? Traffic densities coupled with infrastructure maintenance costs overwhelm the tax payer. It is now a lottery to plan getting around without encountering heavy traffic and delays. On roads that are a poor state of repair.

Get that balance right first before attempting mass developments that are destroying apparently protected green space.

MM9

Full of loopholes in so far as everything is protected except for very special circumstances. Who decides what special circumstances? Residents’ views are ignored. It appears that the needs of speculators and developers take precedence over the views of residents.

The Green belt was developed and designated to protect the public from over development. Already the most densely populated country in Europe; it is time to say ‘no more’.

Attached documents:

Comment: MM2 - LPMM18/5777  Respondent: Mr Timothy Hewlett 15216129  Agent:

Making strategic sites exempt from design constraints (which would result in developments such as the monstrosity that was recently proposed on Three Farm Meadows) shows contempt for the Guildford Borough environment and should not be allowed under any circumstances.

The forecast for housing numbers in GBC is showing a decline in the numbers required by over 4,000 and this alone will negate any need to use Green Belt land to fulfil housing quotas.

Attached documents:
Comment: MM3 - LPMM18/5778  Respondent: Mr Timothy Hewlett 15216129  Agent:

The reasoning behind the level of planned new retail space in Guildford town centre is flawed. The need for retail space is in steep decline across the whole of the United Kingdom and Guildford is no exception. This should be reconsidered and more space given over to residential occupancy which in turn would negate the need to use valuable Green Belt Land and would bring new life into the Guildford town centre.

Attached documents:

Comment: MM40 - LPMM18/5779  Respondent: Mr Timothy Hewlett 15216129  Agent:

SITE A35 – Three Farms Meadows:

The addition of land to the south of the appeal site does not mitigate the housing density issue as so much of that land is constrained by the VOR (the air traffic control beacon which prevents construction within a certain radius from the beacon).

Land to the south abuts the Ockham Conservation area and increases the visibility of the site to and from the Surrey Hill AONB.

The size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds.

There is absolutely no justification for altering the SNCI boundary.

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Any development at Three Farms Meadow and its surrounding area along the lines previously proposed would destroy the village of Ockham - an historic and beautiful location and therefor SITE A35 must be taken out of the local plan and never be considered for development again.

It is clear to anyone that the current Local plan proposal in fatally flawed and must be withdrawn in order that a proper planning and consultation process can take place.

Attached documents:

Comment: MM41 - LPMM18/5775  Respondent: Mr Timothy Hewlett 15216129  Agent:

I am to state that I strongly support the representation made to the Guildford Borough Council (GBC) by the Wisley Action Group regarding Three Farms Meadow (Which for a period of only thirty years was a working airfield).

I draw attention to the following:

The transport plan for Local Plan relies upon improvements to the Junction 10 and the A3 (Guildford) improvements which GBC cannot rely on being delivered as they are in the hands of other bodies . To rely on decisions by another body in this matter is irresponsible.

Attached documents:
### Comment: MM40 - LPMM18/4436  Respondent: Sharon Pask 15227329  Agent:

I understand from Wisley Action Group that I need to raise my objections to, and comments on, the modifications of the Guildford Borough Council (GBC) Local Plan by noon tomorrow.

This unrealistically tight timeframe is as a result of the Council failing to keep me informed of the intended modifications despite my having previously been in contact with the Council in relation to the Local Plan. Please ensure that my name and email details are added to your mailing list.

I wish to **object** to the proposed modifications to the Local Plan. The modifications essentially mean that land is being added to the south of the Wisley Airfield appeal site which will inevitably have a significant and adverse effect on the historic village of Ockham and will destroy the biodiversity of the site.

In addition to the unacceptable and unjustifiable effect on the area itself, the Council has based its modifications to the Local Plan on unsound data.

In the circumstances the examination which led to the modifications should properly be reopened and all current and relevant evidence should be considered.

**Attached documents:**

### Comment: MM40 - LPMM18/4573  Respondent: James Pask 15227617  Agent:

**Objection to GBC Local plan modifications**

There are a number of grounds on which I **object** to the proposed modifications to the GBC Local Plan, namely the adverse impact any development on the additional land to the south of the appeal site would have on the existing local transport structure, the negative effect on the Ockham Conservation area which abuts it and the detrimental impact on a site of nature conservation interest.

**Attached documents:**

### Comment: MM45 - LPMM18/1183  Respondent: Martin Rossetti 15231137  Agent:

Re: Proposals for development in Normandy's Green Belt 105 homes in Glaziers Lane, Normandy. Guildford Borough Council (GBC) Draft Local Plan Main Modification 45 dealing with Policy A64

We, as residents of Normandy/ Flexford, are writing to express our concerns and objections to the above proposal that are now being suggested to be included in the draft structure plan for our village - proposals that include 105 new houses in Glaziers Lane.

We object to the above proposals for the reasons below -

This area is green belt land, land for our enjoyment, open space, countryside, land full of wildlife, deer, hedgehogs, birds, foxes, badgers etc etc. Natural habitats and wildlife need to be protected, our area is a priority habitat under The Wildlife and Countryside act 1981 and the NERC act. We object to the erosion of our green belt land; green belt policy is about preventing urban sprawl by keeping land permanently open, the National Planning Policy Framework (NPPF) writes
about openness and permanency, openness and permanency in our Surrey Hills Area an area of outstanding natural
beauty ... we have a Surrey Hills sign less than half a mile from our house. The above proposals would destroy our green
belt.

No exceptional circumstances have been raised to justify this area being removed from the green belt. Also in the
sustainability assessment it has already been admitted that there are no existing facilities in Flexford so this proposed
development wouldn’t help secure the long term future of village facilities nor contribute to the village vitality.

The proposals are disproportionate and would be an unsustainable development, a 100% increase in the number of
homes in our village, the joining of Flexford and Normandy infilled with housing destroying the rural environment and
taking away the free space between our hamlets. This area referred to as Policy or Site A64 is pasture land, erosion of this
free space will have devastating effects on our wildlife - where will they have to live? Increasing the urbanisation and
joining of Guildford, Normandy and Flexford areas.

Surrey County Council (SCC), we understand, recommended a development at Blackwell Farm for a number of reasons
but in particular for reasons of accessibility in transport terms. The site A64 proposals would cause complete and
unworkable traffic chaos, 105 homes equates to 200+ additional vehicles using Glaziers Lane - our roads are gridlocked
during rush hour times as it is, Guildford Road/Aldershot Road and the Hogs Back A31. We have a narrow humpback
bridge with weight restrictions in Glaziers Lane over the railway right next to this proposed development and a single
track bridge with the railway going over the top in Westwood Lane. The junction at the beginning of Glaziers Lane at the
crossroads with the Guildford Road/Aldershot Road has been turned down for improvement due to lack of space, ditto the
Westwood Lane junction at the Wyke Church of St Marks. These are both narrow country lanes totally unable to cope
with the necessary construction traffic let alone the traffic generated by 105 additional homes. In many places there is
insufficient room to widen either of our country lanes, Glaziers Lane/Westwood Lane, there are Grade 2 listed buildings,
'Little Glaziers' for example which is close to the edge of the lane and would be severely impacted by any road widening
proposals.

GBC objected to development on MOD land in Aldershot (Rushmore Council area) on grounds of insufficient capacity of
our roads network, how can they therefore propose development here on the same limited road network?

Services, electricity, gas, water, sewage etc. are all at capacity we have been informed, the top of Glaziers lane water
pipe has continued to break presumably due to the increased pressure being put through the pipe at peak times to meet the
increasing demand for this essential service to our existing housing. This couldn't cope with any further demands.

The area between Glaziers And Westwood Lanes has a high water table and is prone to flooding, covering this area with
concrete and tarmac will only make this problem worst. This land is the natural water course off the Hogs Back hill an
area, as previously stated, of outstanding natural beauty in the Surrey Hills. The area has ancient and natural woodlands
within it, these may be earmarked to be preserved within the proposals but how can they be enjoyed surrounded by
concrete, bricks and tarmac. The wildlife won't be fooled into staying in an urbanised area just because we keep the
woods and not the surrounding fields that we currently enjoy, the open space we moved here to live within.

[Removed personal data]

Attached documents:

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**Comment:** MM13 - LPMM18/3177 **Respondent:** Barnaby Lawrence 15232513 **Agent:**

MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current
trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use
providing sustainable housing

**Attached documents:**
Comment: MM2 - LPMM18/3175  Respondent: Barnaby Lawrence 15232513  Agent:

I have returned this morning from a holiday, so will have no time to argue my own points.

I believe the local plan is flawed at many levels, infrastructure inadequate, housing need over inflated, wrong type of development (massive new towns as opposed to organic growth through local parish approval)

So I will be doing a cut and paste job so that at least you will get my objection in time to be counted

**DEADLINE Tuesday 23rd October – 12 NOON**

MM is main modification,

**Don’t forget to say object!** – *italics designed to provide an explanation rather than to be used for comments*

**GENERAL**

- MM2 The housing target is wrong. **Call for the hearing to be reopened so that the latest ONS figures and household projections can be taken into account**
- MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
- The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

**Attached documents:**

Comment: MM23 - LPMM18/3179  Respondent: Barnaby Lawrence 15232513  Agent:

MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – *(this makes it easier for developers)*

- Strategic sites are to be exempt from design constraints *(which will result in developments such as that proposed on Three Farm Meadows)*
- There is no evidence that recent case law such as “People over Wind” has been taken into account

**Attached documents:**

Comment: MM3 - LPMM18/3180  Respondent: Barnaby Lawrence 15232513  Agent:

S3 The town centre policy is inadequate and does not address the infrastructure deficit.

**Attached documents:**
SITE SPECIFIC – A35 – Three Farms Meadows

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR (the air traffic control beacon which prevents construction within a certain radius).
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.
- MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Respond by email to planningpolicy@guildford.gov.uk or localplan@guildford.gov.uk

Include your name and address as anonymous representations are not accepted.

Remind your neighbours

Attached documents:

Comment: MM41 - LPMM18/3178 Respondent: Barnaby Lawrence 15232513 Agent:

MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].

- There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM9 - LPMM18/3176 Respondent: Barnaby Lawrence 15232513 Agent:

MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: Other comments - LPMM18/1429 Respondent: Barnaby Lawrence 15232513 Agent:

Dear Sirs,

I have returned this morning from a holiday, so will have no time to argue my own points.
I believe the local plan is flawed at many levels, infrastructure inadequate, housing need over inflated, wrong type of
development (massive new towns as opposed to organic growth through local parish approval) So I will be doing a cut
and paste job so that at least you will get my objection in time to be counted

Attached documents:

Comment: MM41 - LPMM18/3731  Respondent: Victoria Hogben 15233185  Agent:

MM27. MM41. MM42 and MM48 Transport Strategy
Send is a highly congested village. My own road, Potters Lane, is evidence of this; in July my parked car was written off
by a council van when the driver found himself boxed in by rush hour traffic and panicked, driving in to the side of my
car and then reversing in to the front of it. 'Road rage' is becoming a serious problem in Potters Lane, with almost daily
conflicts; this was not the case when I moved in five years ago. My question, therefore, is why has the potential effect of
thousands of extra cars in an already heavily congested area not been taken into account? Nothing has been done to
address this in the most recent document.

Attached documents:

Comment: MM2 - LPMM18/1789  Respondent: Stephen John Tully 15238881  Agent:

Policy S2.

Data from office of National Statistics (September 2018) suggests Guildford Housing needs could be achieved with 460
homes per year not 789 as GBC is recommending. This revised number could/should be achieved by use of Brownfield
sites.

Attached documents:

Comment: MM27 - LPMM18/1785  Respondent: Stephen John Tully 15238881  Agent:

MM27, MM41, MM42, MM48,

Transport Strategy:

The GBC assessment is non existent, the roads around Send could not cope with this extra traffic even with modifications
to A3 etc.

Attached documents:

Comment: MM41 - LPMM18/1782  Respondent: Stephen John Tully 15238881  Agent:
I am writing to object most strongly to the Local Plan Modifications.

MM41. This is Greenbelt Land and would join up Send with Ripley, constituting over development. The local infrastructure cannot cope with an extra 550 homes.

Local planning should be in the hands of local people-over 7000 objections ignored-so much for conservative policy putting local issues in the locals hands.

**Attached documents:**

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**Comment:** MM41 - LPMM18/1786  **Respondent:** Stephen John Tully 15238881  **Agent:**

MM27, MM41, MM42, MM48,

Transport Strategy:

The GBC assessment is non existent, the roads around Send could not cope with this extra traffic even with modifications to A3 etc.

**Attached documents:**

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**Comment:** MM42 - LPMM18/1783  **Respondent:** Stephen John Tully 15238881  **Agent:**

MM42. This industrial development is not needed, it's in the Greenbelt and there are no special circumstances.

**Attached documents:**

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**Comment:** MM42 - LPMM18/1787  **Respondent:** Stephen John Tully 15238881  **Agent:**

MM27, MM41, MM42, MM48,

Transport Strategy:

The GBC assessment is non existent, the roads around Send could not cope with this extra traffic even with modifications to A3 etc.

**Attached documents:**

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**Comment:** MM48 - LPMM18/1788  **Respondent:** Stephen John Tully 15238881  **Agent:**

MM27, MM41, MM42, MM48,
Transport Strategy:

The GBC assessment is non existent, the roads around Send could not cope with this extra traffic even with modifications to A3 etc.

Attached documents:

Comment: MM9 - LPMM18/1784  Respondent: Stephen John Tully 15238881  Agent:

MM9. These "modifications" do not protect the Greenbelt but negates any Greenbelt protection; again completely against government policy putting decisions in the hands of local people.

Nobody, it appears, considers the views of local people-what a sham.

Attached documents:

Comment: MM45 - LPMM18/690  Respondent: Susan Burchett 15241281  Agent:

I am writing with regard to Main Modification 45 dealing with Policy A64 of the Local Plan

I object to the inclusion of this site for the following reasons.

The short consultation period related to Site A64 at this late stage of the Local Plan process is a complete surprise to residents and does not give us the opportunity to devise a development plan for the village that is acceptable to the residents in order to suggest more appropriate sites. It is also unclear how the site could accommodate 105 houses given that there is a large lake on the site. Also, a potential problem is that the site is in the ownership of two different people. Another serious issue is that there is a public footpath that runs across the middle of the site on to the railway line at an uncontrolled crossing, which would be a hazard to children from the development.

The proposed development is located in the Green Belt, outside any identified settlement area and therefore represents inappropriate development, which is harmful to the openness of the Green Belt. It would introduce a “housing estate” type of development whereas there is currently a linear pattern of development in this part of Glaziers Lane. It would also close the visual gap that exists between Normandy and Flexford, to the detriment of the character and appearance of the area. Also relevant is that GBC has stated no special circumstances for the proposal to build on this site that would justify redrawing the Green Belt boundary. GBC has already turned down two planning applications for this site, citing the reasons given above, and these reasons for refusal are just as relevant now as they were then.

Site A64 is not a “Sustainable” site. The “Sustainability Appraisal of the Guildford Local Plan – Report update June 2017” uses the issue of Site A46’s proximity to Wanborough railway station as the sole reason for its development. However the Sustainability Appraisal makes it clear that:

- Land east of Glaziers Lane falls as comprising ‘red-rated’ Green Belt
- There are no existing facilities in Flexford, and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality
- Flexford is also notable in that it is a small village without even a Primary School
- This site is associated with a degree of surface water flood risk at the eastern extent

Glaziers Lane is an unclassified (D60), rural road with speeding cars and lorries using it as a cut through to the A31 and A3. Vehicles park on the pavement because of the narrowness of the road causing problems for pedestrians. An additional
105 houses would generate more traffic and make the Lane even more dangerous. The street lighting is poor and there is a dangerous hump-back bridge with a blind summit very close to the proposed site. Currently there are two plots being developed in the southern part of Glaziers Lane and this is already causing much disruption from the number of associated vehicles being parked just for these two houses. The traffic associated with 105 houses would be totally intolerable.

There are Health and Safety issues with Site A64 as it is adjacent to the Strawberry Farm waste management site. On a daily basis dozens of “Grab” lorries speed along the Lane to the Waste Station and dump bricks, concrete, soil and green waste. This is then processed with the hard materials being crushed, the soil being screened and the green waste composted. This produces dust and other airborne pollutants which affect local residents and their properties, the smell of green waste at times can be pungent, and there is noise from machinery on a daily basis.

If Site A64 were to be developed many infrastructure projects would need to take place, such as:

- Road junctions would need to be improved due to the increase in traffic, and improvements made to the railway bridge
- A proper bus service would be needed to serve the southern end of Glazier Lane
- A safe cycle network installed
- Improvements to the sewerage system
- Expansion of Wyke Primary school
- Additional facilities at the Doctors’ surgery

If GBC decide not to develop Site A64 consideration could be given to the Planning Application (17/P/02326) for 30 dwellings on previously developed land that was recently refused at The Elms Centre in Glaziers Lane GU3 2DF. This is a much more preferable site and is not on the Green Belt.

Attached documents:

Comment: MM41 - LPMM18/4882 Respondent: Christine Relf 15241313 Agent:

MM41 Land at Garlick’s Arch, Send Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years.

The roads and adjacent roads are congested with traffic not only in the rush hour but jurying the whole day. The area is not able to deal with the amount of cars on these roads already and with no infrastructure in place this will causes no end of problems.

This problem is not helped by the increase from the 400 homes to now 550 which is going to cause great strain on doctors and schools, which is at breaking point, as our local schools have a large waiting list and our doctors are full and we have to book appointments a month in advance, which is not idea as we become older.

This is Green Belt and contains wild life which we all need around built up areas, plus the area which you want to build on is a flood plane and gets contamination by the lead shot. As part of village life it is greatly unfair to purpose to build this area up so much that village life does not exist anymore. Shame on you.

Attached documents:

Comment: MM42 - LPMM18/4884 Respondent: Christine Relf 15241313 Agent:
MM42 Land at Burnt Common, Send, Policy A58  Enlarged from 7000 to a minimum 14,800 sq of industrial and Storage

being deleted from the 2014 plan this has been increased twice, doubling the area. This is by far the largest new industrial allocation in any village in the borough. There is no need to put new industrial sites in Green Belt when there is industrial buildings empty on the Slyfield estate. Why cant these empty buildings be used first before trying to build more than what is really required in this area.

Industrial building's will cause gridlocked roads and causing even more damage to the state of our very bad roads.

Attached documents:

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Comment: MM44 - LPMM18/4885  Respondent: Christine Relf 15241313  Agent:

MM44 Land at Alderton's Farm, Send Marsh Road, Send  A 'new' site for 120 homes including some Self Build, which site has been reintroduced again because the housing inspector wanted more homes in the early years of the plan

All the above should be viewed in light of the fact that the latest ONS population and household formation statistics published in the last few weeks which admit to errors in previous calculations, which particularly affect Guildford as a University Town. If applied retrospectively to the Local Plan the revised figures would halve the projected housing requirement and allow a drastic reduction in the supposed need for building on sites in the current Greenbelt.

Please dont let our villages and Green Belt disappear.

Attached documents:

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Comment: MM41 - LPMM18/4336  Respondent: Peter Relf 15241345  Agent:

MM41 Land at Garlick's Arch, Send Policy A43  Increased from 400 to 550 homes of which 450 to be built in the first five years.

The roads and adjacent roads are congested with traffic not only in the rush hour but jurying the whole day. The area is not able to deal with the amount of cars on these roads already and with no infrastructure in place this will causes no end of problems.

This problem is not helped by the increase from the 400 homes to now 550 which is going to cause great strain on doctors and schools, which is at breaking point, as our local schools have a large waiting list and our doctors are full and we have to book appointments a month in advance, which is not idea as we become older.

This is Green Belt and contains wild life which we all need around built up areas, plus the area which you want to build on is a flood plane and gets contamination by the lead shot. As part of village life it is greatly unfair to purpose to build this area up so much that village life does not exist anymore. Shame on you.

Attached documents:
Comment: MM42 - LPMM18/4340  Respondent: Peter Relf 15241345  Agent:

MM42 Land at Burnt Common, Send, Policy A58  Enlarged from 7000 to a minimum 14,800 sq of industrial and Storage

being deleted from the 2014 plan this has been increased twice, doubling the area. This is by far the largest new industrial allocation in any village in the borough. There is no need to put new industrial sites in Green Belt when there is industrial buildings empty on the Slyfield estate. Why can't these empty buildings be used first before trying to build more than what is really required in this area.

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Attached documents:

Comment: MM44 - LPMM18/4345  Respondent: Peter Relf 15241345  Agent:

MM44 Land at Alderton's Farm, Send Marsh Road, Send  A 'new' site for 120 homes including some Self Build, which site has been reintroduced again because the housing inspector wanted more homes in the early years of the plan

Attached documents:

Comment: MM2 - LPMM18/41  Respondent: Paradigm Planning Ltd (Jayne Wunderlich) 15245281  Agent:

My clients own Plot 1 on the attached location plan with frontage access along the main road out of East Horsley in the Lovelace area plan, and would like it considered as a new housing site, particular as Wisley is no longer an option.

Attached documents:  Plot 1 Ockham Road Noth Horsley.pdf (364 KB)

Comment: MM27 - LPMM18/943  Respondent: Michael McGrath 15251105  Agent:

5. MM27, MM41, MM42, AND MM48, TRANSPORT STRATEGY

I object to these Strategies because:

- The various Modifications refer to “mitigation schemes to address the otherwise adverse material (and visual) impacts on communities and the environment” without declaring any conditions that would have to be met by any such “mitigation schemes”. The absence of any defined scope for “mitigation schemes” is to deny the objectors to the Transport Strategy the chance to assess and comment on the desirability of any “mitigation scheme”. The prospect of implementing “mitigation schemes” without any pre-conditions would be poor governance and unacceptable to the communities affected by this Transport Strategy.

- Guildford Borough Council have not demonstrated any assessment of the aggregated traffic impacts on Send Barnes Lane and Send Road from the proposed changes for additional slip roads to the junction of the A247 with the A3, which will substantially increase the traffic flows to and from Woking each day.
The Transport Strategy will lead to yet more vehicle traffic being added to the minor ‘A’ road (the A247) through Send, with already high volumes of traffic, where the 'uktrafficflow' web site shows an average of nearly 14000 vehicles passing along the A247 in Send each day. This high volume already has an adverse effect on the quality of life for the residents of Send with congestion, noise, and pollution from vehicle emissions. Such daily high traffic flow is excessive and must not be increased further by senseless and unnecessary developments.

The loss of open spaces for additional roads will reduce the ability of the natural environment to remove pollutants such as CO₂ from the atmosphere.

Attached documents:

Comment: MM41 - LPMM18/934  Respondent: Michael McGrath 15251105  Agent: 

OBJECTIONS TO THE PROPOSED MAIN MODIFICATIONS TO THE LOCAL PLAN OF GUILDFORD BOROUGH COUNCIL

I am writing to register my objections to the Main Modifications in the Guildford Borough Council Local Plan that will be forever harmful for the residents of Send by overloading the infrastructure, environment, services, and amenities, and permanently damage what remains of our surrounding countryside, and open spaces.

OBJECTIONS RELATING TO ALL PROPOSED DEVELOPMENTS (MM27, MM41, MM42, MM44, and MM48) IN THE GUILDFORD BOROUGH COUNCIL LOCAL PLAN

1. The proposed developments, referred to later in this letter, do not consider the risk of future water shortages, where there are no plans or funding to increase the provision of water storage and supply to additional households and commercial facilities proposed for the Send Parish, within the Affinity Water region.

2. All developments in the Guildford Borough Council Local Plan - referred to later in this letter - are within an area designated by the Environment Agency as “water stressed”. Without any additional means of water supply, it would be irresponsible to risk greater water scarcity in the future by adding to the demands for water from additional developments in and around Send.

3. The Main Modifications where specific objections are described below are, when combined, an unacceptable increase of concentrated housing developments to be imposed on the village of Send and the already over-used roads - without any scope for increasing capacity - and the fully subscribed local medical and schooling facilities.

2. MM41 LAND AT GARLICKS ARCH, SEND MARSH, POLICY A43

I object to the change to Policy A43 because:

• This is a huge increase on the original proposal to which I and many thousands of local residents have previously objected to as being excessive and wholly inappropriate for the area.

• This land at Garlicks Arch is in existing Green Belt with ancient woodland - providing a valuable resource for CO₂ capture - that should not be destroyed by urbanisation.

• This development will create urban sprawl leading to the merging of the villages of Ripley and Send and a loss to those communities of their distinct character.

• Such development overload will increase urbanisation, leading to intolerable stresses on existing transport infrastructure and services, such as the lack of any additional capacity for the local GP Centre and the newly amalgamated Send School.

• 5. MM27, MM41, MM42, AND MM48, TRANSPORT STRATEGY
I object to these Strategies because:

- The various Modifications refer to "mitigation schemes to address the otherwise adverse material (and visual) impacts on communities and the environment" without declaring any conditions that would have to be met by any such "mitigation schemes". The absence of any defined scope for "mitigation schemes" is to deny the objectors to the Transport Strategy the chance to assess and comment on the desirability of any "mitigation scheme". The prospect of implementing "mitigation schemes" without any pre-conditions would be poor governance and unacceptable to the communities affected by this Transport Strategy.

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- The Transport Strategy will lead to yet more vehicle traffic being added to the minor ‘A’ road (the A247) through Send, with already high volumes of traffic, where the 'uktrafficflow' web site shows an average of nearly 14000 vehicles passing along the A247 in Send each day. This high volume already has an adverse effect on the quality of life for the residents of Send with congestion, noise, and pollution from vehicle emissions. Such daily high traffic flow is excessive and must not be increased further by senseless and unnecessary developments.

- The loss of open spaces for additional roads will reduce the ability of the natural environment to remove pollutants such as CO\textsubscript{2} from the atmosphere.

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Attached documents:

**Comment:** MM42 - LPMM18/935  **Respondent:** Michael McGrath 15251105  **Agent:**
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OBJECTIONS RELATING TO ALL PROPOSED DEVELOPMENTS (MM27, MM41, MM42, MM44, and MM48) IN THE GUILDFORD BOROUGH COUNCIL LOCAL PLAN

1. The proposed developments, referred to later in this letter, do not consider the risk of future water shortages, where there are no plans or funding to increase the provision of water storage and supply to additional households and commercial facilities proposed for the Send Parish, within the Affinity Water region.

2. All developments in the Guildford Borough Council Local Plan - referred to later in this letter - are within an area designated by the Environment Agency as “water stressed”. Without any additional means of water supply, it would be irresponsible to risk greater water scarcity in the future by adding to the demands for water from additional developments in and around Send.

3. The Main Modifications where specific objections are described below are, when combined, an unacceptable increase of concentrated housing developments to be imposed on the village of Send and the already over-used roads - without any scope for increasing capacity - and the fully subscribed local medical and schooling facilities.

   3. MM42 LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

I object to the changes to Policy A58 because:

• The “minimal” allocation of 14,800 sq. m. of industrial and storage space is open-ended and exposes the land to unknown future development encroachment, where such a proposed allocation already breaches the law which is meant to prevent local authorities allowing building on Green Belt, unless special circumstances exist.

  o No special circumstances exist to encroach upon this area of Green Belt and remove it forever, as the ‘2017 Land Needs Assessment’ shows a reduction of 3.9 hectares of industrial land being required for the whole of Guildford Borough.

  o The proposed allocation of over 10 hectares of industrial land at this location is contrary to the needs reduction of 3.9 hectares, mentioned above.

  o There is no justifiable case for creating more industrial units in Send when Guildford, including the dedicated commercial area at Slyfield, have vacant sites.

  o This allocation of industrial and storage space would be in addition to the 25% increase at Send Business Centre, giving a much greater concentration of such developments in Send, way beyond that in any other village in the Borough, without any proven demand.

  o Such speculative developments as this will permanently damage the surrounding area and cannot be justified or supported by any rationale showing a benefit for local communities.

  o It disregards the overwhelming number of previous objections from local residents which should not be ignored.

  o The land at this location is Green Belt and must be retained to prevent increasing urbanisation and to preserve the natural habitat of ancient woodland and allow biodiversity to function alongside built-up environments.

  o The area has high levels of existing vehicle movements along the A3, A247 and B2215 routes, with already dangerous levels of pollution from motor vehicles and any reduction in green spaces nearby reduces the opportunities for atmospheric CO₂ capture.
It would be immoral to inflict additional levels of pollution on the local population by additional industrial capacity and associated vehicle movements.

5. **MM27, MM41, MM42, AND MM48, TRANSPORT STRATEGY**

I object to these Strategies because:

- The various Modifications refer to “mitigation schemes to address the otherwise adverse material (and visual) impacts on communities and the environment” without declaring any conditions that would have to be met by any such “mitigation schemes”. The absence of any defined scope for “mitigation schemes” is to deny the objectors to the Transport Strategy the chance to assess and comment on the desirability of any “mitigation scheme”. The prospect of implementing “mitigation schemes” without any pre-conditions would be poor governance and unacceptable to the communities affected by this Transport Strategy.

- Guildford Borough Council have not demonstrated any assessment of the aggregated traffic impacts on Send Barnes Lane and Send Road from the proposed changes for additional slip roads to the junction of the A247 with the A3, which will substantially increase the traffic flows to and from Woking each day.

- The Transport Strategy will lead to yet more vehicle traffic being added to the minor ‘A’ road (the A247) through Send, with already high volumes of traffic, where the 'uktrafficflow' web site shows an average of nearly 14000 vehicles passing along the A247 in Send each day. This high volume already has an adverse effect on the quality of life for the residents of Send with congestion, noise, and pollution from vehicle emissions. Such daily high traffic flow is excessive and must not be increased further by senseless and unnecessary developments.

- The loss of open spaces for additional roads will reduce the ability of the natural environment to remove pollutants such as CO\textsubscript{2} from the atmosphere.

**Attached documents:**

**Comment:** MM44 - LPMM18/936  **Respondent:** Michael McGrath 15251105  **Agent:**

**OBJECTIONS TO THE PROPOSED MAIN MODIFICATIONS TO THE LOCAL PLAN OF GUILDFORD BOROUGH COUNCIL**

I am writing to register my objections to the Main Modifications in the Guildford Borough Council Local Plan that will be forever harmful for the residents of Send by overloading the infrastructure, environment, services, and amenities, and permanently damage what remains of our surrounding countryside, and open spaces.

**OBJECTIONS RELATING TO ALL PROPOSED DEVELOPMENTS (MM27, MM41, MM42,MM44, and MM48) IN THE GUILDFORD BOROUGH COUNCIL LOCAL PLAN**

1. The proposed developments, referred to later in this letter, do not consider the risk of future water shortages, where there are no plans or funding to increase the provision of water storage and supply to additional households and commercial facilities proposed for the Send Parish, within the Affinity Water region.

2. All developments in the Guildford Borough Council Local Plan - referred to later in this letter - are within an area designated by the Environment Agency as “water stressed”. Without any additional means of water supply, it would be irresponsible to risk greater water scarcity in the future by adding to the demands for water from additional developments in and around Send.

3. The Main Modifications where specific objections are described below are, when combined, an unacceptable increase of concentrated housing developments to be imposed on the village of Send and the already over-used roads - without any scope for increasing capacity - and the fully subscribed local medical and schooling facilities.
4. MM44 LAND AT ALDERTON’S FARM, SEND MARSH ROAD, POLICY A63

I object to the Policy A63 because:

- This additional development will lead to an increased burden of additional vehicle movements putting further congestion at the Send crossroads junction.
- It will devalue the attractiveness and character of Send Marsh.
- It will contradict the Green Belt Policy MM9 as there are no special circumstances to allow an exception to be made for this proposed development.

Attached documents:

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Comment: MM48 - LPMM18/937  Respondent: Michael McGrath 15251105  Agent:

OBJECTIONS TO THE PROPOSED MAIN MODIFICATIONS TO THE LOCAL PLAN OF GUILDFORD BOROUGH COUNCIL

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Attached documents:

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Comment: MM48 - LPMM18/946  Respondent: Michael McGrath 15251105  Agent:

5. MM27, MM41, MM42, AND MM48, TRANSPORT STRATEGY

I object to these Strategies because:

- The various Modifications refer to “mitigation schemes to address the otherwise adverse material (and visual) impacts on communities and the environment” without declaring any conditions that would have to be met by any such
“mitigation schemes”. The absence of any defined scope for “mitigation schemes” is to deny the objectors to the Transport Strategy the chance to assess and comment on the desirability of any “mitigation scheme”. The prospect of implementing “mitigation schemes” without any pre-conditions would be poor governance and unacceptable to the communities affected by this Transport Strategy.

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- The loss of open spaces for additional roads will reduce the ability of the natural environment to remove pollutants such as CO$_2$ from the atmosphere.

I thank you for your time and consideration of my objections.

Attached documents:

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**Comment: MM9 - LPMM18/939 Respondent: Michael McGrath 15251105 Agent:**

1. **MM9 GREEN BELT POLICY**

   I object to Guildford Borough Council making exceptions to existing designated Green Belt in and around Send, to allow “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”, because:

   - Such exceptions would permanently remove Green Belt land which is more valuable to society now than it ever has been because, even if such land is not obviously with any special visual merit, it provides natural habitats supporting local biodiversity for a variety of plant, animal and insect life.

   - The loss of such Green Belt land, in and around Send, however small or seemingly without any special attractiveness also reduces the opportunities for atmospheric CO$_2$ capture that is now vital to help the environment. And this Green Belt also allows for natural dispersion of rain water, which will be even more important in the future, if forecasts for the UK to experience much more rainfall are fulfilled.

   - Any additional houses and other developments in Send would increase the urbanisation of what is a semi-rural area protected by Green Belt from the closeness of the already built-up Woking Borough and lead to a merging of Send and nearby Ripley, which would lose their identity as individual villages.

   Attached documents:

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**Comment: MM2 - LPMM18/5911 Respondent: Kath Frackiewicz 15257281 Agent:**

**Guildford Borough Council (GBC) Proposed Local Plan - Comments On Proposed Modifications**
I wish to place on record that the comments relating to the previous versions of the Guildford Local Plan (Plan) made in my previous emails dated 17 July 2016 and 23 July 2017 continue to apply.

Regarding the proposed modification to the Plan I fully agree and endorse the comments and points of objection expressed in the two letters from East Horsley Parish Council dated 10 October 2018 dealing with (i) various comments on the proposed modification (ii) Policy A35 - Land at former Wisley Airfield, Ockham, and also those from Wisley Action Group.

Dealing with the modified plan I wish to make the following comments as in my opinion the Plan is unsound:

Number of Houses (MM2): The current version of the Plan should be based on the latest household growth projections from the Office of National Statistics, such projections now being some 50% lower than the current plan for some 12,500 houses. I continue to believe that the housing targets for Guildford Borough are excessive and over-stated particularly given the developing political situation including pending withdrawal from the EC.

Finally I believe that the Plan is unsound as it does not consider the latest population statistics and trends, relies on utilising green belt land, does not fully utilise brown field development which would have the benefit of regenerating our ailing town centres and increasing the inflow of Council Tax revenue. I also consider that the many submissions and representations of East Horsley Parish Council together with other adjoining parish councils such as West Horsley, Ockham, etc. as well as the submissions and representations made by Wisley Action Group have not been properly considered and/or ignored.

As such I consider that the Plan must be amended to reflect the above and thereafter the Public Examination (MM2) of the Plan re-opened.

Attached documents:

Comment: MM40 - LPMM18/5913  Respondent: Kath Frackiewicz 15257281  Agent:

3. Policy A35 - Land at Wisley Airfield (Three Farm Meadows): The continued retention of this land in the Local Plan for an enormous settlement remains totally unacceptable and is ill-founded and against the views of the vast majority of the population currently residing in East & West Horsley, Ockham, Ripley, and other surrounding areas of population. The continued inclusion of this site is in my opinion a complete disregard by Guildford Borough Council officials of the fact that development on this site was rejected by the Secretary of State following a Public inquiry. This site should be removed from the Plan once and forever to allow the local communities to live in their chosen environment without the continued threat of development on the former Wisley Airfield and its surrounding land.

Attached documents:

Comment: MM9 - LPMM18/5912  Respondent: Kath Frackiewicz 15257281  Agent:

Policy P2 - Green Belt (MM9): The proposed changes to the insetting of East Horsley and West Horsley as well as the movement of the settlement boundaries of the respective villages in unacceptable and against the policy of having a protected Green Belt.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/866</th>
<th><strong>Respondent:</strong> Mr Brian Middlemiss 15257953</th>
<th><strong>Agent:</strong></th>
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<td>MM27, MM41, MM42 and MM48 Transport strategy for the whole area. There appears to be no proper assessment of the combined traffic impact on the Send Road and Send Barnes Lane with potentially thousands of extra cars passing through the village daily. What would Mr Hammond think of this? It is bad enough at present trying to get to Woking or Guildford. This I object to.</td>
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<tr>
<td>MM41 Increasing the number of homes to 550 from 400 thus joining Send and Ripley together with further loss of Greenbelt and woodland. To this I object.</td>
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<tr>
<td>MM42 To further increase industrial development as to be the largest allocation in any of the villages in the borough. This I object to.</td>
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<td>MM44 Aldertons Farm once again appearing with possible 120 homes again on Green Belt land. This I object to.</td>
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<th>Comment: MM9</th>
<th>LPMM18/862</th>
<th>Respondent: Mr Brian Middlemiss 15257953</th>
<th>Agent:</th>
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<tr>
<td>Sirs I write for the fourth time to voice my strong opinions on the potential decimation of what has been for me a lovely place to live with beautiful surroundings for many years now. The percentage increase in housing of 45% if approved is an enormous amount and totally out of proportion with large areas of green belt affected in the making. The recent headline in the local paper stated that numbers had been overestimated by several thousand in the Guildford area which would include our little village of Send. Although I am not allowed to go over previous objections I would like to highlight the latest additions starting with MM9 Green Belt Policy.</td>
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<th>Comment: MM45</th>
<th>LPMM18/2653</th>
<th>Respondent: Normandy Parish Council (Leslie Clarke) 15259937</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Re: Response from Normandy Parish Council to Guildford Borough Council regarding the 'Main Modifications' the Guildford Local Plan October 2018</td>
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<td>Normandy Parish Council wishes to OBJECT to Main Modification 45 (MM45) relating to Policy A64.</td>
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<td>1. Synopsis of Objection</td>
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</table>
1.1 The site is within a ‘red-rated’ area of Green Belt and the ‘exceptional circumstances’ that would justify removing it from the Green Belt have not been established.

1.2 The site is not in a sustainable location despite its proximity to the train station, since the settlement lacks any facilities and necessitates the need to travel by car to meet basic needs. This is reflected in the SA Addendum (9.14.1) but not properly analysed or given weight in that report.

1.3 The existing infrastructure cannot cope with 105 additional properties, but no mention is made of this.

1.3.1 Despite the site being close to the railway, there are no public transport options to attend schools and doctor's surgeries, necessitating car journeys for most patients, students and parents.

1.3.2 The addition of 105 homes will bring with it around 200 cars, which would result in a significant increase in traffic on Glaziers Lane (which is classified as a D road) and further add to the daily clog at the Give Way junctions at each end.

1.3.3 Glaziers Lane already experiences a large number of heavy goods vehicles travelling along, many at speed. It is currently experiencing large numbers of commercial and delivery vehicles with the development of two houses, so the addition of vehicles required to transport materials and personnel for a further 105 during construction would cause significant disruption and hazard.

1.3.4 The site is close to the bridge over the railway line near Wanborough Station. This is also a hazard due to it being offset and in constant need of repair due to the heavy lorries that cross it.

1.3.5 The existing sewerage and drain network is barely able to cope with the current village population.

1.4 The site does not have capacity to accommodate 105 dwellings without substantial harm to the character of the area, and to the wider landscape. This is recognised in the refusal of application 16/P/01452 which does not seem to have been properly considered.

1.5 If the fishing lake is not infilled, the density of the development will obviously be excessive and cause harm to the wider landscape including the setting of the AONB.

1.6 The site is not likely to be delivered in whole or in part in the first five years of the plan and is unlikely to accommodate the quantum of development for which it is allocated. Therefore, its allocation does not achieve the stated purpose.

1.7 The issue of the impact from the soil processing facility (see Planning Officer's Comments, 16/P/01452) has not been resolved and is likely to result in substantial objection to the development until it is.

1.8 Network Rail's position is unknown but given their previous stance there is likely to be concern about the intensification of use of the crossing which might necessitate a further order to divert the footpath or works to ecological effects which will substantially delay the delivery of housing.

1.9 If the fishing lake is to be infilled, then (a) that will delay delivery and (b) there are potentially significant ecological effects which have not been assessed and might delay delivery of housing or result in objections.

1.10 The site may not be deliverable within the first five years of the plan as it is not in single ownership and there is no evidence that all the landowners are willing to cooperate.

1.11 There are unresolved concerns about drainage which might delay the delivery of the site.

2. Background and further detail

2.1. On 2 October the Parish Council organised a public meeting jointly with the Normandy Action Group to hear views of local residents on GBC’s proposals. There was a strong turnout (around 200 people) and a near unanimity of view (only one dissenting voice) opposing the inclusion of Site A64 as a Main Modification to the Local Plan. The meeting
was also attended by our MP, County Councillor, and Borough Councillor, all of whom indicated their opposition to the proposal.

From this meeting it is clear that Normandy residents wish to preserve the semi-rural nature of their environment. They also have major concerns about the impact on infrastructure of a large-scale development of this kind: traffic, drainage, and sewerage in particular (which are already a well-documented chronic problem in Glaziers Lane), but also added pressure on facilities such as the local primary school and the doctors' surgery. In that regard a development of 105 houses presents the same 2.2. The Parish Council would not in principle resist any further allocation of land in Normandy, but not if it is on this scale and such that it damages the open nature of the Green Belt between the settlements of Normandy and Flexford. Other sites in Normandy have recently been the subject of unsuccessful planning applications. Two examples are North Wyke Farm (14/P/00779 and 15/P/01670) and the Elm Centre (17/P/02236) - a close look at the reasons that were given by Planning Officers for turning down these applications makes clear that these considerations have been ignored with regard to site A64. A comparative analysis of the arguments advanced against the Elm Centre proposal with the A64 proposal is attached. Incidentally the Elm Centre site is on GBC's Brownfield Register but was not considered in the Sustainability Appraisal.

2.3. In addition to its reservations about Site A64 the Parish Council believes that GBC has failed to demonstrate the 'exceptional circumstances' that justify moving the Green Belt boundary. The recent publication by the Office for National Statistics (ONS) of revised household formation figures has called into question the underlying basis of this Local Plan, which is an annual housing need of 630, plus 42 to make up for Woking's shortfall. In response the Inspector himself has, on 25 September, issued the following note: "I should like to offer the Council an opportunity to comment on the latest version of the Household Projections and their implication for OAN. The related population projections were of course discussed in the hearings." At the very least the Parish Council believes that the Examination in Public should be re-opened so that the credibility of the eventual housing number can be established.

2.4. In addition, the sole rationale for this site is that it supposedly allows for the early delivery of additional housing. However, this is questionable for a number of reasons:

2.4.1. The land is in multiple ownership and we have no good reason to believe that the owner of a major portion of it is unwilling to sell.

2.4.2. Roughly a third of the site is taken up by an artificial but substantial fishing lake (which also conveys significant wildlife benefits) and it is not clear whether this would be retained as a feature or whether it would be partly or completely filled in.

2.4.3. There are environmental health issues deriving from the site's close proximity to the waste management facility at neighbouring Strawberry Farm.

2.4.4. There are issues of public safety deriving from the fact that the public footpath that traverses the site goes over the railway line on an uncontrolled crossing; Network Rail would presumably need to address this before the site could be developed.

2.4.5. The site abuts the Area of Great Landscape Value that in turn abuts the Surrey Hills Area of Outstanding Natural Beauty; the boundaries of the latter are about to be reviewed, and this could further constrain the development of the site.

2.4.6. The site is adjacent to an SNCI and a detailed wildlife assessment would need to be undertaken before it could be developed.

3. Summary

The Parish Council opposes this development because 'exceptional circumstances' have not been demonstrated a development on this scale, while being of no benefit to the community, would also prove very harmful to it. Nor would it be likely to deliver the benefits of early housing delivery that the Inspector challenged GBC to find.

See appendix attached.
Comment: MM44 - LPMM18/2763  Respondent: ANTHONY GENT 15262497  Agent:

I STONGLY OBJECT TO THE 120 NEW HOMES ON POLICY 163. I WORRY FOR MY HEALTH BECAUSE OF THE EXTRA TRAFFIC OMNISSONS. I SUFFER WITH A [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]. THIS IS A REAL CONCERN FOR ME.

Attached documents:

Comment: MM2 - LPMM18/1855  Respondent: Robert Peake 15264001  Agent:

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/1859  Respondent: Robert Peake 15264001  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.
MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/1871  Respondent: Robert Peake 15264001  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined

Attached documents:

Comment: MM3 - LPMM18/1857  Respondent: Robert Peake 15264001  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate

Attached documents:

Comment: MM3 - LPMM18/1870  Respondent: Robert Peake 15264001  Agent:

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM31 - LPMM18/1860</th>
<th>Respondent: Robert Peake 15264001</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.</td>
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<tr>
<td>MM31 A height limit for North Street is required.</td>
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<td>MM31 There appears to be no allocation for an all-direction bus interchange.</td>
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<tr>
<td>MM32 A height limit for White Lion Walk is required.</td>
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<tbody>
<tr>
<td>MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.</td>
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<tr>
<th>Comment: MM35 - LPMM18/1867</th>
<th>Respondent: Robert Peake 15264001</th>
<th>Agent:</th>
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</table>
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/1868 **Respondent:** Robert Peake 15264001  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded

**Attached documents:**

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**Comment:** MM44 - LPMM18/1869 **Respondent:** Robert Peake 15264001  **Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment:** MM48 - LPMM18/1854 **Respondent:** Robert Peake 15264001  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

Attached documents:

Comment: MM9 - LPMM18/1858  Respondent: Robert Peake 15264001  Agent:
MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment: MM2 - LPMM18/1466 Respondent: Mrs Roshan Bailey 15264065 Agent:**

The figures used for housing need are excessively high and should be reconsidered. Particular issues which make it necessary to reopen this aspect of the examination are double counting (eg of student needs), the recent ONS figures showing significantly lower population forecasts, and the inclusion of an allowance for Woking's gap. Woking's figures are also higher than can be justified by ONS forecasts, and the requirement for neighbouring boroughs to sacrifice green belt land for Woking's shortfall is being challenged in the courts by Waverley BC.

**Attached documents:**

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**Comment: MM36 - LPMM18/1472 Respondent: Mrs Roshan Bailey 15264065 Agent:**

This proposed development is completely inappropriate. Not only is this area in the Green Belt, but it is also an Area of Great Landscape Value and potentially for inclusion within the Area of Outstanding Natural Beauty. It is part of the very special view from the Hogs Back. Once ruined, we will never be able to retrieve this incredibly beautiful area which currently provides walking, cycling and horse riding for many members of the surrounding villages and Guildford itself, thus also protecting the Thames basin Special Protection Area. The housing needs as indicated by up to date ONS population figures do not justify development on this site.

**Attached documents:**

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**Comment: MM37 - LPMM18/1473 Respondent: Mrs Roshan Bailey 15264065 Agent:**

For the reasons given in my comments on MM36, the development proposed for Blackwell Farm should be removed from the Local Plan. In any case, the land proposed for an access road is inappropriate due to the harm it would cause to the Area of Outstanding Natural Beauty.

**Attached documents:**

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**Comment: MM45 - LPMM18/1476 Respondent: Mrs Roshan Bailey 15264065 Agent:**

This site is entirely inappropriate for development and should be removed from the Local Plan. It has been added at the last minute with no previous consultation, having not featured in any of the previous versions of the Draft Local Plan, although previous applications to GBC for development on the site have, quite rightly, been refused. This is Green Belt and there are no special circumstances to justify building here. The character of the overall village of Normandy is a collection of distinct settlements, with this site A64 being the open area between Flexford and Normandy. Development
here would therefore damage the openness of the countryside and the character of our village. It would also affect the AONB adversely by scarring the views with a dense housing development completely out of keeping with the area. It should be noted that a large proportion of the site is filled with a lake, and the proposed housing numbers could only be achieved with buildings which would be closer together and higher rise than is appropriate for a rural village. Furthermore, the infrastructure simply could not cope with a new development here, and particularly not on this scale. The traffic through Normandy is already unacceptable during rush hours and whenever there is an incident on either the A3 or A31, and current and planned building in areas such as Tongham are already going to exacerbate this problem significantly. Land drainage and sewerage systems are under intolerable pressure and many houses in Normandy already suffer regular flooding in times of heavy rainfall. Normandy has an extremely high water table and significant loss of fields to roadways and buildings will have an enormous adverse impact with heavy rainfall swelling flood waters further downstream. Normandy is a country village and would be hugely damaged by the proposed 7% increase in housing. Given that the housing need currently shown in the draft Local Plan is far too high (see comments on MM2), this site in Flexford & Normandy should be removed entirely.

Attached documents:

**Comment:** MM2 - LPMM18/6075  **Respondent:** Land Owner of Hornhatch Farm 15267521  **Agent:** MADDOX (Matt Hill)

I write on behalf of our client in relation to the ‘Guildford borough submission Local Plan: Strategy and sites main modifications consultation’, which opened on 11 September 2018. Our client is the landowner of ‘Land at Hornhatch Farm, Chilworth’.

We support the overall strategy of the Plan and support the Council’s efforts being undertaken to ensure an up-to-date Local Plan is in place. Our response is set out below:

**Spatial strategy and housing delivery**

Following comments made by the Inspector during the Local Plan Examination that the Council must find additional sites to assist with the early delivery of housing, our client welcomes the proposed spatial strategy and approach to housing delivery through the allocation of further sites to contribute to the delivery of housing within the first five years of the emerging Local Plan. Most notably, the subsequent inclusion of ‘Land at Hornhatch Farm, adjoining New Road, Chilworth’ as an additional site within the main modification draft of the Local Plan is clearly supported by our client.

**Attached documents:**

**Comment:** MM43 - LPMM18/6076  **Respondent:** Land Owner of Hornhatch Farm 15267521  **Agent:** MADDOX (Matt Hill)

**Policy A62: land at Hornhatch Farm, Chilworth**

Our client supports the allocation of land at Hornhatch Farm for up to approximately 80 residential dwellings, under emerging Policy A62.

The land at Hornhatch Farm presents an ideal opportunity to create a sustainable new extension to the village of Chilworth. The site has the potential to deliver around 80 new homes including a policy compliant provision of affordable housing, which will be set within an attractive landscape setting and in close proximity to existing community facilities. Additionally, the development of the site will provide a significant amount of additional landscaping and open space, including play space on the site, which will subsequently provide
Residents of Chilworth with further access to green amenity. The deliverability and suitability of the site is shown on the accompanying Masterplan.

There is clear evidence that there are no real constraints to bringing forward an application for development on the site without delay. The site is not located within the AONB, however, it does fall within close proximity to it. Nonetheless, a number of technical studies have been undertaken, including a Landscape Visual Impact Assessment (‘LVIA’), which set out that development shown on the accompanying Masterplan would not disrupt any views to or from the AONB and would not result in the loss of woodland/parkland and would preserve the overall pattern of settlement and countryside in the wider landscape. It is therefore clear that the allocation of ‘Land at Hornhatch Farm’ (Policy A62) would contribute to the Council’s unmet housing need through the provision of up to 80 dwellings, whilst considering the environmental and other constraints within the Borough.

Deliverability

As set out within the National Planning Policy Framework (2018), for sites to be considered deliverable, there needs to be clear evidence that the housing completions will begin on the site within five years. As set out above, our client has instructed the preparation of a site wide Masterplan, which has been supported by a suite of technical documents that have demonstrated that there are no constraints to bringing forward an application without delay. Indeed, the Inspector will note that the site was previously assessed in the 2014 “Draft Guildford Borough Council Local Plan: Strategy and sites” as suitable for residential development within one to five years, and this is still clearly the case. To this end, a preapplication submission has been made to the Council and it is the intention for this to be followed by a planning application in early 2019. Development on site is therefore anticipated late 2019/early 2020, which demonstrates that the site has a very realistic prospect of being delivered within five years.

I trust that this letter is clear but please do not hesitate to contact me if you have any questions or queries.

Attached documents:  Maddox Rep.pdf (406 KB)

Comment: MM35 - LPMM18/1323  Respondent: Steve Sage 15273057  Agent:

Re the Transport strategy. Nothing short a full 4 way junction on the A3 at Gosden Hill will be sufficient. All the current two junctions on the A3 in Guildford cause a huge amount of congestion and we do not need another one

Attached documents:

Comment: MM45 - LPMM18/1354  Respondent: Mrs Valerie Cheesman 15273249  Agent:

This is based on 672 extra homes per year, where as the latest projection is for 360 by a leading national expert, the inspector should take this into account.

The site entrance is onto a Lane, D class, next to a blind top railway bridge, endangering all those entering and leaving the site

The site is 1.5 miles from the nearest primary school and 5.0 miles from a secondary school there are no public transport connections to either, thus creating more car usage at peak times.
Road linkage to major roads, A323 and A31 is already an accident waiting to happen, with severe congestion at peak times.

Glaziers Lane has major defects, at the junction to the A323 it is sinking with major ruts, which are repaired on a regular basis. At the railway bridge it is also sinking making a hump in the road where cars can 'ground'.

One third of the site is a fishing lake, which stops the rest of the site from flooding, where will the water drain too if this is removed?

The infrastructure will not take further housing in Glaziers Lane, sewers already have none return valves fitted to stop back up and the lane is often awash with raw sewage!

This is green belt land, where on special circumstances have been shown.

This site will increase the usage of the local doctors surgery which at present it takes two to three weeks to book an appointment.

No where in the draft amendments of the Local Plan are any improvements to infrastructure for this site mentioned.

Previous applications on this site have been rejected, as inappropriate development within the green belt.

**Attached documents:**

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**Comment:** MM2 - LPMM18/1345  **Respondent:** Mr Simon Gimson 15274049  **Agent:**

I do not accept that the housing demand figures used for this draft plan are correct.

The latest household figures from the Office for National Statistics show lower numbers of houses required.

I am also very concerned that the methodology used by GBC to assess housing need has not been made public and subject to scrutiny. This undermines public confidence in the process of creating a sustainable and durable Local Plan.

I also understand that some of the calculations on housing need in Guildford have been based on the Electoral Roll and registrations at NHS surgeries. In a town with a high turnover of students these figures will not reflect the actual long term need.

I am specifically concerned about the inclusion of Blackwell’s Farm and the impact on the AONB and Gosden Farm which will reduce the openness of the view from the Hogs Back.

In summary it should not be acceptable to permit building on Green Belt land using housing demand methodology which is not shared with the public and out of date.

**Attached documents:**

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**Comment:** MM45 - LPMM18/1343  **Respondent:** Mr Simon Gimson 15274049  **Agent:**

I wish to register my Objection to the proposed Policy A46.

Specifically
• I do not accept that the housing demand figures have been properly scrutinised and explained. The failure to publish the assumptions used undermines public confidence in this process.
• I do not think that there are the necessary Exceptional Circumstances to permit moving the boundary of the Green Belt at this location in Flexford.
• The road system is not capable of taking further pressure and there are existing problems with the capacity of the sewerage system. There are only three routes into Flexford - one from the Hogs Back and the Aldershot Road (to/from Aldershot and Guildford). The junctions at Normandy and the A31 are clogged at peak hours and this development will make matters worse.
• There are regular leaks of sewerage in Flexford Road - approx 100 m south of the proposed site on the south side of the railway. This is because the sewer from Wanborough has to flow north and it is already at capacity. The addition of 100 houses will make this situation worse.
• A number of planning applications for this site have been turned down in the past because of the impacts on the Green Belt - I cannot understand how GBC can now decide it is suitable for circa 100 houses.
• A large part of the site is water and therefore not suitable for housing. There are resident and migratory birds who use the pond who will be displaced. Each autumn large flocks of Canada geese gather and fly between this site and the area of the Hogs Back where they glean from harvested land. Other wildlife will also be adversely affected.
• The proposed development is not sustainable as there are no shops or other facilities in the area. This development will not preserve improve the viability of any local services.
• The Green Belt is meant to be open - the view from the Hogg’s Back currently is very pleasant. Filling in this area of open space will permanently affect the area and create more urban sprawl between Aldershot and Guildford.
• The last minute inclusion of this site in the Draft Local Plan is very surprising and suggests it is the result of intemperate action rather than careful consideration.

Attached documents:

Comment: MM41 - LPMM18/1920  Respondent: Mr Trevor Deacon 15274369  Agent:

This is a green belt site containing ancient woodland.

The local road structure is already overloaded both morning and evening, 500 to 1000 additional cars will bring this to standstill with the proposed new entries to the A3 adding even more traffic.

The percentage increase from the last proposal is far in excess of what is reasonable and the local facilities, the medical centre and the primary school, will be unable to cope, they are already full. Cars parking at the school block Send Barns Lane, Woodhill and the surrounding area.

The previous 7000 objections to only 400 homes have been ignored

Attached documents:

Comment: MM42 - LPMM18/2061  Respondent: Mr Trevor Deacon 15274369  Agent:

As there no special circumstances as MM( there should not be a development on Green Belt

The local single track roads are already used as a rat run because of excessive traffic build up at the Clandon Road roundabout and this will result in heavy lorry's trying to use the same narrow road
Why is an industrial area needed when there is capacity at Slyfield

Together with the proposed increase in the Send Business Centre this would turn a domestic area village into a major industrial area

The Employment Land Needs Assessment shows a reduction in demand for industrial land and to include this doubled land area will therefore create a requirement rather that fill a need.

**Attached documents:**

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**Comment: MM44 - LPMM18/2072  Respondent: Mr Trevor Deacon 15274369  Agent:**

Green Belt land without special circumstance as MM9 and should not be included

Send Marsh Road is already regularly blocked with traffic trying to access Portsmouth Road and the Send Road traffic lights often blocked in both directions due to the inability to turn into Send Marsh Road. Adding 200 plus cars will only worsen the situation.

The addition of this site together with the Garlic Arch site coupled with the existing dwellings will create a village mass without services or infrastructure.

**Attached documents:**

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**Comment: MM41 - LPMM18/2084  Respondent: Mrs Dalis Deacon 15277281  Agent:**

It is green belt

The increase is not reasonable for the area

Local infrastructure is already blocked

Local facilities are already full

Previous objections to a smaller number of homes have been ignored

**Attached documents:**

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**Comment: MM42 - LPMM18/2091  Respondent: Mrs Dalis Deacon 15277281  Agent:**

Local roads are already used as rat runs with lorries added these would become totally blocked

Local main roads cannot cope with the existing traffic load

There is no need now for industrial area in the locality. Slyfield has space
Comment: MM44 - LPMM18/2093  Respondent: Mrs Dalis Deacon 15277281  Agent:

- Green Belt and should not be built on
- Existing infrastructure cannot cope now

Comment: MM11 - LPMM18/4265  Respondent: Ripley Parish Council (Jim Morris) 15278369  Agent:

Ripley Parish Council does not agree with the statement in Policy P4 MM11 (3), that: “there will be no increase in development vulnerability” with regard to the Garlick’s Arch development. The parish council again draws attention to local knowledge that this site floods REGULARLY during the winter months and the wider area, including Send Marsh, is built on a large clay-based bowl which will be compromised by the massive new housing addition and worsen the flood risk. More locally in Send Marsh, gardens of existing properties are known to flood in wet weather. Building extensively on the Aldertons Farm site will cover natural run-off areas and thereby exacerbate flooding in existing gardens, possibly leading to homes being flooded.

The parish council fails to understand how these areas of ancient woodland can remain unharmed if the development is squeezed into every square metre of the proposed site, to allow for the increase in housing numbers. Either the ancient woodland is protected or it is not and GBC has an obligation to ensure that the biodiversity of this site is maintained to the highest standard. Furthermore, in Ripley Parish Council’s opinion the potential for allocating a SANG elsewhere does not mitigate any harmful erosion of this important ancient woodland designation.

Furthermore, the proposal to site Travelling Showpeople and their fairground equipment on the Garlick’s Arch site also seems poorly considered as this will not sit comfortably in a normal residential area. The more natural place for such heavy plant and lorries, etc., would be at the Burnt Common Site.

Comment: MM2 - LPMM18/4268  Respondent: Ripley Parish Council (Jim Morris) 15278369  Agent:

4. Strategic Housing Market Assessment (SHMA)

Ripley Parish Council considers that is entirely erroneous for GBC to increase the SHMA in our borough by the uptake of 20% of the unmet need for Woking Borough Council (630 homes) – MM2 4.1.9aa. The recent publication of updated household projections by the Office for National Statistics showed significantly reduced figures. It could be calculated that the household projections for Guildford would suggest a household growth (and hence a housing need) that is significantly lower than that suggested using the 2014 projections. The recalculations will also apply to Woking Borough Council and eliminate the need for GBC to take up any shortfall within Woking Borough. Considering GBC & Woking Borough Council updated predictions, GBC must recalculate the SHMA to reflect the lower projections. Ripley Parish Council is yet to receive a convincing argument as to why our borough is required to include shortfalls within another borough. It certainly brings into question why GBC is proposing to build on precious greenbelt land and surely does not
meet the criteria of “exceptional circumstances”. In addition, Ripley Parish Council questions whether these figures are even accurate given the huge residential tower blocks that are under construction in central Woking. Instead, Woking Borough could actually take up some of Guildford’s potential unmet housing need and thereby assist in saving some of Guildford’s green belt areas.

Attached documents:

| Comment: MM3 - LPMM18/4266 | Respondent: Ripley Parish Council (Jim Morris) 15278369 | Agent: |
|-----------------------------|--------------------------------------------------------|

3. Town Centre

Ripley Parish Council considers that this Plan is significantly over weighted with regard to the additional retail allocation in Guildford Town Centre (MM3). It seems entirely specious that Guildford should “buck the trend” nationally, insofar as the retail sector is struggling to sustain profitability in the high street situation, against online retail. We note that the much lauded Tunsgate development has been less than successful with a substantial volume of units still empty. In addition, there are a large number of vacant units in the Upper High Street and North Street. A number of High Street retailers are openly struggling to survive (House of Fraser being one and John Lewis reporting substantial decreases in profit). Extra numbers of retail units are unlikely to be required in the North Street redevelopment zone. It would clearly make more sense to include provision of more residential units (primarily one- and twobedroom flats in higher rise buildings) within the central area of Guildford that offer excellent employment opportunities and sustainable transportation. An additional 40,000 sqm of retail space would seem a move out of step with current retail reality.

Attached documents:

| Comment: MM40 - LPMM18/4270 | Respondent: Ripley Parish Council (Jim Morris) 15278369 | Agent: |
|-----------------------------|--------------------------------------------------------|

5. A35 Former Wisley Airfield (FWA)

It appears that further green belt farmland is being purchased by the would-be site developer, with a view to extending the site considerably, and thus overcome a number of the current limitations on the current site. This type of creeping development on such a massive scale places not only Ockham under further threat but much of the surrounding area. This could lead to any number of agricultural sites being converted into additional construction sites. Policy A35 MM50 also hugely and unacceptably reduces the site’s designated SNCl.

Ripley Parish Council continues its objection to the principal of the FWA development and reiterates that it is entirely disproportional, totally lacks the required infrastructure and is a wholly unsustainable venture. This is borne out, for example, by the woefully inadequate site transport scheme being proposed.

Attached documents:
Ripley Parish Council continues to have major reservations regarding many aspects of the Guildford Borough Council (GBC) Local Plan, all of which have been previously submitted and still stand.

However, the council wishes to make further objections and contributions to the proposed main modifications namely:

1. Site Allocations:
   a) A43 Garlick’s Arch - increase of 150 homes to 550 homes
   b) A63 Aldertons Farm – new allocation of 120 homes
   c) A58 Burnt Common Strategic Employment Site – initial 100% increase of industrial space to over 14,000 sqm with the potential to increase in each 3-year period thereafter

2. Transport Strategy

3. A6 Town Centre – allocation of further retail space

4. Strategic Housing Market Assessment figures

5. A35 Former Wisley Airfield


1. Site Allocations

The allocations of sites: A43 Garlick’s Arch; A63 Aldertons Farm; and A58 Burnt Common Strategic Employment Site will have severe “in-combination” impacts upon the villages of Ripley, Send and Send Marsh. There is no escaping the fact that there is inadequate provision for any road traffic mitigation arising from an estimated 670-720 new homes, together with the inevitable large volume of traffic generated by the industrial site over the period of the Plan and beyond. To get this in proportion, the current number of houses in Ripley village is less than 700.

There does not seem to be any firm commitment to the construction of policy site A43a the A3 Burnt Common slip roads during the period of the Plan. Indeed, the financing of these slip roads appears to be in some disarray and relies upon 100% funding from the developers of site A35 Former Wisley Airfield. Ripley Parish Council continues to oppose the Burnt Common slip roads for reasons stated in earlier submissions. However, should the Garlick’s Arch development, the Burnt Common Strategic Employment Site and/or the Aldertons Farm development site all proceed to inclusion in the Local Plan, the parish council would strongly urge that traffic mitigation measures are put in place PRIOR to housing and industrial sites being constructed. Clearly provision of the new slip roads would go some way to easing local traffic congestion although it may of course be detrimental in that it will draw in additional road traffic to the Send/Burnt Common area.

Ripley Parish Council objects to the modifications of the Garlick’s Arch and Aldertons Farm sites based on the very poor provision of community infrastructure such as medical facilities, schools and community sports facilities. Ripley Primary School has recently been closed by Surrey County Council with no indication as to its future. The Villages Medical Centre is already heavily subscribed and it offers poor lead times for appointments. There is no the specific provision for such facilities within the documentation. Additionally, the car parking facilities in both Ripley and Send are at capacity and these increased numbers will only worsen an already bad situation.

With regards to Policy A43 MM41, Ripley Parish Council has grave concerns regarding the significant uplift in housing number to 550 homes, together with the “increased landscaped buffer” at the Garlick’s Arch site and its impact upon the surrounding protected ancient woodland. Quoting from AECOM statement 9.2.4 “The increased land-take needed to deliver this landscaping, in combination with the additional 150 homes, COULD FEASIBLY LEAD TO INCREASED PRESSURE ON THE ANCIENT WOODLAND WITHIN THE SITE”.

2. Transport Strategy
The Transport Strategy contained in Policy A43: MM41 (Ob) for Garlick’s Arch traffic being mitigated by the provision of an alternative link to avoid the roundabout is woefully inadequate and will simply provide two opportunities of queueing traffic instead of one. Clearly this is an entirely inappropriate solution. In addition, Ripley Parish Council seeks further clarification of Policy A43 MM41 (Oe) regarding “necessary and proportionate contribution” to “address the otherwise adverse material impacts on communities and the environment including in Send and Ripley”. This is not plain English and the obfuscation in the documentation provided by Aecom and GBC is clearly not designed to be transparent or helpful to the residents of the borough.

Attached documents:

**Comment:** MM42 - LPMM18/4261  **Respondent:** Ripley Parish Council (Jim Morris) 15278369  **Agent:**

**RIPLEY PARISH COUNCIL RESPONSE TO GUILDFORD BOROUGH COUNCIL SUBMISSION LOCAL PLAN: STRATEGY & SITES - MAIN MODIFICATIONS**

Ripley Parish Council continues to have major reservations regarding many aspects of the Guildford Borough Council (GBC) Local Plan, all of which have been previously submitted and still stand.

However, the council wishes to make further objections and contributions to the proposed main modifications namely:

1. Site Allocations:
   a) A43 Garlick’s Arch - increase of 150 homes to 550 homes
   b) A63 Aldertons Farm – new allocation of 120 homes
   c) A58 Burnt Common Strategic Employment Site – initial 100% increase of industrial space to over 14,000 sqm with the potential to increase in each 3-year period thereafter

2. Transport Strategy

3. A6 Town Centre – allocation of further retail space

4. Strategic Housing Market Assessment figures

5. A35 Former Wisley Airfield


1. Site Allocations

The allocations of sites: A43 Garlick’s Arch; A63 Aldertons Farm; and A58 Burnt Common Strategic Employment Site will have severe “in-combination” impacts upon the villages of Ripley, Send and Send Marsh. There is no escaping the fact that there is inadequate provision for any road traffic mitigation arising from an estimated 670-720 new homes, together with the inevitable large volume of traffic generated by the industrial site over the period of the Plan and beyond. To get this in proportion, the current number of houses in Ripley village is less than 700.

There does not seem to be any firm commitment to the construction of policy site A43a the A3 Burnt Common slip roads during the period of the Plan. Indeed, the financing of these slip roads appears to be in some disarray and relies upon 100% funding from the developers of site A35 Former Wisley Airfield. Ripley Parish Council continues to oppose the Burnt Common slip roads for reasons stated in earlier submissions. However, should the Garlick’s Arch development, the Burnt Common Strategic Employment Site and/or the Aldertons Farm development site all proceed to inclusion in the
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Ripley Parish Council objects to the modifications of the Garlick’s Arch and Aldertons Farm sites based on the very poor provision of community infrastructure such as medical facilities, schools and community sports facilities. Ripley Primary School has recently been closed by Surrey County Council with no indication as to its future. The Villages Medical Centre is already heavily subscribed and it offers poor lead times for appointments. There is no the specific provision for such facilities within the documentation. Additionally, the car parking facilities in both Ripley and Send are at capacity and these increased numbers will only worsen an already bad situation.

Ripley Parish Council has grave concerns regarding the open-ended size and nature of the proposed Policy A58 Burnt Common Strategic Employment Site. This site has already more than doubled in size from 7000 sqm to 14800 sqm with the modifications to the Plan, with further potential for substantial increase in size. According to MM42 3 the Employment Land Needs Assessment will be updated every 3 years and “this site would be able to provide a larger amount (of floorspace) either within or after the Plan period”. The supposition that many employees of the industrial site will be living at Garlick’s Arch is ridiculous. Therefore, we discount the assertion that pedestrians and cyclists will be the main modes of transport to and from the Burnt Common site. There is no mention either of the significant amount of traffic generated by visitors and shoppers to this site. The parish council draws comparisons to the current Slyfield industrial site which generates significant amounts of traffic on a daily basis. There is also the potential for a large Waste Management site at the Burnt Common location, very quietly hidden in earlier documentation of the Local Plan. The addition of HGVs and waste vehicles will put unprecedented strain on the local road network, causing significant harm to the existing communities of Ripley and Send as well as West Clandon.

Attached documents:

1. Site Allocations

The allocations of sites: A43 Garlick’s Arch; A63 Aldertons Farm; and A58 Burnt Common Strategic Employment Site will have severe “in-combination” impacts upon the villages of Ripley, Send and Send Marsh. There is no escaping the fact that there is inadequate provision for any road traffic mitigation arising from an estimated 670-720 new homes, together with the inevitable large volume of traffic generated by the industrial site over the period of the Plan and beyond. To get this in proportion, the current number of houses in Ripley village is less than 700.

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Attached documents:

Comment: MM9 - LPMM18/4271  Respondent: Ripley Parish Council (Jim Morris) 15278369  Agent:

6. Insetting

The situation regarding the proposed changes to the insetting boundaries for Ripley Village/green belt are unclear and Ripley Parish Council awaits further clarification on its original objections from GBC. The boundary has been moved during the submission process, finally resting along the High Street and Newark Lane, and leaving a proportion of the settlement within the green belt. The parish council disagrees that any part of Ripley village should be considered for insetting.

Attached documents:

Comment: MM2 - LPMM18/2055  Respondent: Mr Martin Stringfellow 15279649  Agent:

The number of houses in the plan should be reduced, not increased, following the 40% reduction in the ONS household growth projections for Guildford.

Attached documents:
Comment: MM9 - LPMM18/2053  Respondent: Mr Martin Stringfellow 15279649  Agent:

East Horsley should be excluded from the villages proposed for insetting as all three criteria for suitability (open character; continuous open areas within the village into the surrounding land; and incomplete and indistinguishable boundaries for new Green Belt boundaries) for insetting are failed. We walk extensively in and around Horsley and it is precisely its open, rural setting with seamless transition into open country that defines it. Insetting would threaten this. Once lost, this character is irretrievable.

Attached documents:

Comment: MM9 - LPMM18/2057  Respondent: Mr Martin Stringfellow 15279649  Agent:

New development should be concentrated in Guildford itself, particularly given the 40% reduction in the ONS’ forecast of new housing requirements for the area. Guildford is almost certainly the location most sought after by young families with their need for infrastructure such as schools, healthcare and transportation links, and jobs. These families should not be forced to live in the middle of nowhere. East Horsley (and probably several other villages) should be removed from the insetting proposals.

Attached documents:

Comment: MM45 - LPMM18/2596  Respondent: David Godman 15282017  Agent:

I wish to object to the inclusion in the local plan of MM 45 policy A64.

My main concerns are the increase in traffic that this huge development will generate.

When there is a problem on either the A3 or A31 the route through Normandy down Glaziers Lane becomes the preferred route for rush hour traffic.

Without any improvement to the roads in Normandy the crossings of the railway, either over or under are inadequate to cope with the number of vehicles.

The railway bridge on Glaziers lane is at present a dangerous blind summit with a huge 'step' up to it when traveling south to north. This is just as the footpath crosses the road to access the station side of the road. So either the pedestrians from the new development will risk the road crossing to access the station or they'll be using their cars and greatly increase the traffic already using Glaziers Lane.

The crossroads in Normandy where Glaziers Lane meets the A323 is an accident black spot so without any further improvements to this junction things will only get worse with another 105 houses along Glaziers Lane.

I also cannot see that there are any exceptional circumstances to justify taking this site out of green belt. Use brownfield sites instead. Once our green fields have been built over the green belt will no longer exist! We will have one huge urban development and the rural character of our village will be lost forever.

Attached documents:

Comment: MM43 - LPMM18/768  Respondent: John Peake 15282657  Agent:
I wish to respond to the following item:

Policy A62: Hornhatch Farm, land adjoining New Road, Chilworth - proposed early housing development of 80 new homes.

I object to this proposal on the following grounds:

The site is currently in the Green Belt and within the Settlement Boundary.

A high pressure gas main runs right across the site, preventing any nearby building.

The traffic problems, already severe at the site, would be greatly aggravated.

It would be detrimental to the protected views from the AONB.

Attached documents:

Comment: MM9 - LPMM18/1367  Respondent: Mr Tom Davies 15282977  Agent:

I object strenuously to the removal of West Horsley from the Green Belt. Para 4.3.12 states that "However, the NPPF states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt and other development management policies used to restrict any inappropriate development."

It is clear to all who live or pass through the village that the open character of the village contributes to the Green Belt, and that this open character would no longer be present were limited infilling to be permitted in the village, and on this basis I request that the ambition for West Horsley to be removed from the Green Belt to be dropped from the Local Plan.

Attached documents:

Comment: MM9 - LPMM18/1371  Respondent: Mr Tom Davies 15282977  Agent:

Re. MM9 Policy Paras 1-4:

I object to the inclusion of the following text:

ii. Limited infilling may also be appropriate outside the inset settlement boundaries, as designated on the Policies Map, of the following villages where it can be demonstrated that the site should be considered to be within the village.

Ash Green, Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.

With regard to West Horsley, the character of the village is defined in part by the spacious nature of the settlement and the generous plot sizes and distance between houses. I see no benefits to allowing infilling outside the current (note: current, NOT proposed) settlement boundaries as this will lead to a denser population of housing and a reduction in the spacious character of the village. Please remove this text.

Attached documents:
Re. Para 4.3.25:

I object to the proposed change to the settlement boundary in the region of West Horsley Village Green and the surrounding housing. The proposed changes would place West Horsley village green within the settlement boundary and would thus enable the existing track across it to be used as access for future property development to the rear of numbers 180 to 200 The Street.

The Village Green is of iconic importance to West Horsley - indeed the oak tree therein is the village symbol, used widely on signage as a motif of the village. To allow this to be included in the settlement boundary and thus subject to adjacent development and use as an accessway for construction traffic would be a travesty and an injustice to the nature of the village.

The reason given for the change to the settlement boundary was that "we're just tidying up the boundary". I submit that this is insufficient reason to alter the existing settlement boundary and that this reason does not fall in line with any of the stated policy changes, thus the proposed change in this area should be dropped.

Attached documents:

I object to the removal of West Horsley from the Green Belt. The Plan shows no positive defence of the Green Belt, despite this covering 81% of the borough’s area. The plan is widely seen by residents as declaring war on the countryside by “inserting” most of the borough’s villages, extending settlement boundaries, removing SNCI protections and prioritising greenfield housing estates over urban regeneration.

No justification has been given for the inserting of West Horsley from the green belt. "SPECIAL CIRCUMSTANCES" are required to remove any areas from the Green Belt, which have not been given. I object to Greenbelt removal.

Attached documents:

I wish to record my objection to the above planning policy. In particular I am concerned about the inappropriate change of use of green belt farmland and the building of 105 houses over a period of 3 years. I am concerned that the proposal has been introduced without consultation and without being given the opportunity to suggest more suitable alternatives.

The change of use for the land in question is wholly unwarranted and would adversely impact upon the existing infrastructure, and the adjacent road is a country lane which is already overburdened with excessive traffic.

Much of the traffic to and from the proposed site during construction and when completed will be faced with going over the already dangerous blind humpback railway bridge only a few metres away from the entrance/exit.
The heavy amount of traffic currently using the adjacent Flexford Road is causing damage to properties with cracked walls and any further traffic will worsen the situation.

This proposal has been made without any benefit to the local community and the provision for the much needed improvement of the local infrastructure is missing from the proposal.

Attached documents:

Comment: MM45 - LPMM18/725  Respondent: T.W. Turnill 15284385  Agent:

Submission Local Plan - Normandy

I wish to submit my objection to the planned proposal for 105 houses in Glaziers Lane, Normandy for the following reasons.

1. Inadequate Infrastructure

I refer primarily to the effect 105 extra houses, each with a probable two cars, will have on the local traffic situation, which is already creaking. Glaziers Lane is a country lane, having a dangerous bridge associated with the railway line. Whenever there is an accident on the Hogs Back or A3, traffic tries to exit via Wanborough Hill to use Glaziers Lane which is neither capable nor designed to take that volume of traffic. Anyone who tries to access the A31 at peak traffic times from either the Puttenham or Wanborough directions will know how long the queues are, and the potential for accidents for traffic leaving the A31 at the Puttenham turn off. This could severely jeopardise Emergency traffic trying to access the new development, whose road structure might well not be capable of allowing Fire and Ambulance vehicles to attend an emergency, especially during peak traffic times.

2. Flooding and associated Sewage Problems

Parts of Normandy are subject to severe flooding problems, and the Station Car Park is regularly flooded during the downpours which have been occurring regularly. The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a severe health hazard.

The proposed development area at present allows natural drainage through the soil and trees, although the water table is high here, as witnessed by the grass remaining green during the recent dry summer; if this area is concreted over, the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area.

3. Enviromental Impact

The village of Normandy lies within an area of outstanding natural beauty close to the Surrey Hills to the South and the Army Heathland to the North. It provides a welcome rural break between the towns of Aldershot and Guildford, and is in Red designated Green Belt. It features a wide range of wild life, including many endangered and protected species, and the addition of 105 households, with their associated cats, would decimate much of the wild life that lives here. In addition, the replacement of the present agricultural land with housing would remove a valuable habitat for all the wild creatures that have come to rely on the peaceful nature of the area.

4. The non-safeguarded Agricultural Land for building.

The area proposed for building 105 houses is Green Belt, designated Red agricultural land, which has been constantly used for grazing and livestock. The government has repeatedly said that such land should NOT be used for building, unless there were overwhelming requirements to do so. These requirements have not been shown to exist in this village.

5. Legal Aspects
Guildford Borough Council, unlike the other Surrey Councils, insists that there is a requirement for double the number of houses in this area compared with theirs. The estimate was provided by a firm which refuses to disclose how it came to that conclusion on the grounds of "commercial sensitivity". It has been put into question by the Office of National Statistics which has recently said that the estimate is about 45% too high. Thus, the council has no way of verifying how accurate the firm's estimate is, or what assumptions were used in coming to this figure. It is imperative that this arbitrary figure be challenged, and another firm used who will be transparent in the assumptions it makes, so that a proper estimate can be used.

6. The use of Brown Field sites.

I feel that GBC has made little imaginative use of the many brown sites that are available especially in the Town centre. Much more effort should be made to these, in spite of developers’ objections.

In summary, and in view of the points I have made above, I would be grateful if you would log my strong objections to the proposal to build 105 houses in Glaziers Lane in the village of Normandy.

Attached documents:

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Comment: MM45 - LPMM18/761  Respondent: Mrs Laurel Kitchen 15299169  Agent:

I have great reservations about the planning application to erect 105 houses on land next to Glaziers Lane. We have no infrastructure in Normandy to cope with this number of properties the surrounding roads are lanes and not capable of handling the additional traffic. To fit the number of proposed properties on the land designated they would need to be of a town hose style and 3 storeys high which is completely out of character with the rest of our village. The sewerage system is currently over capacity and there are no plans to improve this. The station at Wanborough is currently running slow as there are problems with the line this will only increase with more stress on the bridges and road network. There are no plans to increase the size of the doctors and they currently have an overworked system.

I am not in favour of this going ahead. We do not have the infrastructure to cope in our village.

Attached documents:

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Comment: MM27 - LPMM18/4524  Respondent: Hannah Green 15303457  Agent:

5. MM27, MM41, MM42 and MM48 Transport Strategy

There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

Attached documents:

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Comment: MM41 - LPMM18/4519  Respondent: Hannah Green 15303457  Agent:

I am writing to object to the modifications resulting from the Planning Inspector’s Report impacting the village of Send within Guildford Borough. Overall, the danger is that, if the proposals / modifications go ahead, Send will be transformed
in such a way that its village identity will be permanently destroyed. Linked to this, there will be significantly increased congestion, pollution and resulting damage to the environment. This will impact residents both in Guildford Borough and beyond. My objections are:

1. **Main Modification 41 (Land at Garlick’s Arch, Send Marsh, Policy A43) because:**

Firstly, there will be an increase of 37% in the number of houses that will subsequently destroy the village’s identity. It ignores 7,000 objections already lodged from the people of your borough that it is your duty to listen to. It is also a Green Belt land containing ancient woodland and that should be protected. The main modification 41 will join up two separate villages (Send and Ripley) resulting in insufficient school places due to the recent closure of Ripley Primary school and no extra capacity at Send Primary school. The site is subject to frequent flooding (a flood zone 2 area) and contamination by lead shot. With this modification the extra cars will block up the adjacent roads and increase air pollution of carbon monoxide, nitrogen monoxide and nitrogen dioxide. Lastly, the Medical facilities will be unable to cope with the increase.

5. **MM27, MM41, MM42 and MM48 Transport Strategy**

There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

**Attached documents:**

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**Comment:** MM42 - LPMM18/4520  **Respondent:** Hannah Green 15303457  **Agent:**

2. **MM42 (Land at Burnt Common, London Road, Send A58) because:**

It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan. With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East. The concentration in Send is more severe than any other part of the Guildford Borough. This seems unfair to increase this any more. Furthermore the industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity, thus the need for MM42 seems unnecessary. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not the proposed huge allocation of over 10 hectares at Send – and in the Green Belt. Once again, the impact on congestion will be significant as will Nitrogen dioxide levels causing potential damage to health.

5. **MM27, MM41, MM42 and MM48 Transport Strategy**

There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

**Attached documents:**

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**Comment:** MM44 - LPMM18/4521  **Respondent:** Hannah Green 15303457  **Agent:**

1. **MM44 (Land at Alderton’s Farm, Send Marsh Road Policy A 63):**

This is green belt land with no special circumstances so it contradicts MM9 and is illegal. Also the additional traffic will increase pressure on Send Crossroads. Living at these cross roads, I can testify to the fact that it is very difficult to get out of our drive at rush hour as traffic is tailed back to the A3. Once again, air pollution affects our garden and environs.
<table>
<thead>
<tr>
<th>Comment</th>
<th>MM48 - LPMM18/4525</th>
<th>Respondent: Hannah Green 15303457</th>
<th>Agent:</th>
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5. **MM27, MM41, MM42 and MM48 Transport Strategy**

There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock.

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4. **MM9 Green Belt policy**

This introduces a very subjective test and actually negates Green Belt policy. Speculators may be able to ‘pick off’ land at the edge of the village.

<table>
<thead>
<tr>
<th>Comment</th>
<th>Other comments - LPMM18/4526</th>
<th>Respondent: Hannah Green 15303457</th>
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</table>

6. **Other developments**

The travellers’ site on Send Hill will exacerbate all the problems mentioned above and make the overall impact on Send significantly detrimental to all those living in this part of the world.

I would be most grateful if my views listed above would be taken in to careful consideration when going forward with your plans. Many thanks.

<table>
<thead>
<tr>
<th>Comment</th>
<th>MM27 - LPMM18/1263</th>
<th>Respondent: Eloise Haxton 15313697</th>
<th>Agent:</th>
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**MM27, MM41, MM42, MM48 Transport Strategy**

- No assessment has been made of the impact on Send and Ripley of the increase in cars with the resultant gridlock, delays, noise and nitrous dioxide pollution.
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<td><strong>MM41 Land at Garlicks Arch, Send Marsh, Policy A43</strong></td>
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<td>My objections are</td>
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<td>• The villages of Send and Ripley will become joined, causing over development.</td>
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<td>• Increase in cars and residents will cause busier roads, a need for school places that cannot be provided and an over run GP surgery</td>
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<td>• This is an excessive increase in houses and previous objections have been ignored.</td>
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<td><strong>MM42 Land at Burnt Common, Policy A58</strong></td>
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<td>My objections are;</td>
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<tr>
<td>• There is already unused industrial sites at Slyfield, a need for this type of land has reduced and an increase at Send Business Centre mean this type of development is unnecessary and has not been proposed in any other village.</td>
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<tr>
<td>• It is on Green Belt land and the increase in traffic will block already busy roads</td>
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Comment: MM44 - LPMM18/1261  Respondent: Eloise Haxton 15313697  Agent:

MM44 Land at Alderton’s Farm, Policy A63

My objections are;

- This is Green Belt land with heritage centres at Send Marsh Green which will be affected, also an increase in traffic will block the roads and Send crossroads
- These proposed developments at Garlicks Arch, Clockharn and Winds Ridge would increase the number of houses by 45% with already insufficient infrastructure and facilities for the current 1700 homes in Send.

Attached documents:

Comment: MM9 - LPMM18/1262  Respondent: Eloise Haxton 15313697  Agent:

MM9 Green Belt Policy

My objections are;

- The modifications to the Green Belt policy will lead to more development by stealth and it will no longer be protected.

Attached documents:

Comment: MM27 - LPMM18/1629  Respondent: Steven Brown 15320737  Agent:

Transport strategy for MM27, MM41, MM42 nd MM48

There has been no rigorous assessment of the impact of the proposed developments on traffic flows in the area. The road to Woking is already gridlocked in rush hour times. The proposed developments would lead to significantly worse traffic which would be intolerable to existing residents.

Attached documents:

Comment: MM41 - LPMM18/1625  Respondent: Steven Brown 15320737  Agent:

MM41 Garlick’s Arch

The original plan to build houses on green-belt land containing ancient woodland was unacceptable.

The proposed 150 increase in the number of houses just makes it worse. There are already long traffic jams in rush hour through Send village and this proposed modification will make it intolerable. In addition, there is insufficient schooling and medical facilities to support so many additional residents.
Transport strategy for MM27, MM41, MM42 nd MM48

There has been no rigorous assessment of the impact of the proposed developments on traffic flows in the area. The road to Woking is already gridlocked in rush hour times. The proposed developments would lead to significantly worse traffic which would be intolerable to existing residents.

Attended documents:

Comment: MM42 - LPMM18/1626  Respondent: Steven Brown 15320737  Agent:

MM42 Land at Burnt Common

This represents more than doubling of the industrial and storage space. This is a huge amount for one village, and much bigger than any other village in the borough and is not supported by demand for industrial land. The road infrastructure is insufficient for the traffic volumes that will result.

Attended documents:

Comment: MM42 - LPMM18/1631  Respondent: Steven Brown 15320737  Agent:

Transport strategy for MM27, MM41, MM42 nd MM48

There has been no rigorous assessment of the impact of the proposed developments on traffic flows in the area. The road to Woking is already gridlocked in rush hour times. The proposed developments would lead to significantly worse traffic which would be intolerable to existing residents.

Attended documents:

Comment: MM44 - LPMM18/1627  Respondent: Steven Brown 15320737  Agent:

MM44 Alderton’s Farm

This proposed development is on green belt land and there are no special circumstances to justify it. This development would be close to Send Marsh green with beautiful heritage buildings and would spoil the character of the area. We chose to live in Send because of the amount of open green space. The local infrastructure cannot accommodate the cumulative effect of these developments.

Attended documents:
Transport strategy for MM27, MM41, MM42 and MM48

There has been no rigorous assessment of the impact of the proposed developments on traffic flows in the area. The road to Woking is already gridlocked in rush hour times. The proposed developments would lead to significantly worse traffic which would be intolerable to existing residents.

I strongly object to these plan modifications.

Comment: MM48 - LPMM18/1632  Respondent: Steven Brown 15320737  Agent:

MM9 Green Belt Policy

The proposed modification to the policy would allow subjective judgements to be made about building on green-belt land. In effect, this would open the flood gates to more and more development on green-belt land that can never be reversed. The policy should be tightened to preserve the nature of the area, not relaxed.

Comment: MM9 - LPMM18/1628  Respondent: Steven Brown 15320737  Agent:

OBJECTIONS TO THE CURRENT FORM OF THE LOCAL PLAN;

I wish to object in the strongest possible terms to the continued reluctance on the part of GBC to modify its housing numbers in our village. This seems particularly disgraceful since the original figures on which the perceived needs were originally based, are now, it seems based on inaccurate figures. They are based on what has now become a shrinking population, a population which therefore has less need of housing. In any event, there are far too many vagaries. Not only has the borough based its information in its insistence on the old requirements for the numbers of housing, but both it and the definition of “affordable housing” is a ridiculous nonsense in the context of our Borough. What we need is Social Housing and there seems almost no provision for that. Further, there is no secure safeguard from developers who suddenly present “good reasons” for not completing a development as intended. Thus even these ridiculously small numbers of “affordable homes” will see further reductions in their number due to a little “unforeseen misfortune” that inevitably visits the "financially stressed" developers.

Not only do I object to the unchanged housing numbers, but I object even more strongly, if that is possible, to the continued refusal, especially given what should be reduced housing requirements, to restore our Green Belt to our village. ANY incursion into the Green Belt on some spurious and unsubstantiated housing need, will once and for all, destroy the rural nature of our village. This not only destroys our enjoyment of it, but to the countless hundreds of visitors who come to share it with us and damages the environment beyond repair.

Comment: MM51 - LPMM18/5021  Respondent: Mel Beynon 15321025  Agent:
No substantial justification for the use of Green Belt for extensive development has ever been presented for West Horsley. Given the reduction in retail space required now that we have unequivocal proof that the High Street is shrinking, should the Borough not take a more enlightened view and use up unwanted retail space for modest town housing and release, as it is meant to, the brown filed sites that it jealously guards, thus safeguarding the precious Green belt.

If our communities are to survive, is we want to have cleaner, less polluted environs, people need to live much nearer their working places in the town and not be forced to use cars to travel from villages outside the town. At the moment such people can’t even travel by bus because our transport system doesn’t allow for a work force to travel by public transport to our anywhere except London. The result is never ending grid lock through Guildford and in both direction on the A3 Any development of the Green Belt needs “proved special circumstances”. As the current plan stands, there are no special circumstance and none have been put forward to justify building in the Green Belt .

To reiterate my position....... I OBJECT to the plan as it currently stands and would beg GBC to reconsider.

The lunacy of the whole plan is further emphasised by the re-insertion of the Three Meadows site at Wisley despite its having been rejected by the inspector! He saw only too clearly that there is no supporting infrastructure even after the M25/A3 development, insufficient educational support far too late in the plan especially when local schools are all over subscribed and total destruction of a sensitive bio-diversity. Indeed these issues MUST be careful re-thought and re-considered for all our sakes,

PLEASE NOTE: Although I am a Parish Councillor in West Horsley, this submission is entirely an expression of what is entirely my own opinion.

Attached documents:

**Comment:** MM45 - LPMM18/154 **Respondent:** Ian Nicholson 15321249 **Agent:**

Revised local plan - Policy A64 - land between Glaziers Lane and Strawberry Farm

Regarding the above I have to register a strong objection to the inclusion of this area of land in the revised local plan. The Normandy/Flexford area is just not suitable for significant further development, even we ignore the fact that this is actually Green Belt land.

The local infrastructure just would not cope with such an increase in the number of dwellings (105) without significant improvement to it extending well beyond the boundaries of Normandy and Flexford themselves. The access to the site would be via Glaziers Lane itself and from Flexford road over the railway bridge. Traffic would be significantly increased, especially at peak times, which would be to the detriment of all residents, including those residing at the proposed new development.

Of far more concern is the strain that would be put on the drainage/sewage network. Are any significant improvements to that planned? The existing network is already overloaded at times and at full capacity in normal circumstances so to add an additional 105 homes without any significant increase in drainage/sewage capacity could cause major problems for everyone, existing and proposed new residents alike. To make any significant improvements to the drainage/sewage infrastructure would, no doubt, be very expensive and obviously cause major disruption and inconvenience extending well beyond Normandy and Flexford.

It is difficult so see how such a development on this site can be justified at this time given that it is Green Belt land and so far I have seen no exceptional circumstances put forward that would justify redrawing green belt boundaries. I feel sure that there are many far more suitable brown field sites in Guildford and the surrounding area that could be utilised to enable GBC to meet its responsibilities for house building before having to resort to considering building on this site. The infrastructure in the area really isn’t capable of supporting any further major development.
4) MM27 MM41 MM42 MM48 are part of the above observations.
 Attached documents:

**Comment: MM41 - LPMM18/1730  Respondent: J D W Todd 15326369  Agent:**

I object to many of the latest proposals involving the above

1) MM41 The **increase by 37% in the number of houses** is excessive and will cause severe traffic problems on adjacent roads, cause the joining of Riley and Send, and will put a strain on all local facilities both medical and schooling (Send Primary School is already at full capacity following the closure of Ripley School and medically it is already difficult latterly to get an appointment within the nationally accepted time.

4) MM27 MM41 MM42 MM48 are part of the above observations.
 Attached documents:

**Comment: MM42 - LPMM18/1725  Respondent: J D W Todd 15326369  Agent:**

2) MM42 An Excessive increase in area compared to previous proposals for which no need can be made (Slyfield has unused capacity) and an increase of 25% proposed for Send Business Centre just makes this even more excessive all this despite a reduction in demand shown by the Land Needs Assessment

4) MM27 MM41 MM42 MM48 are part of the above observations.
 Attached documents:

**Comment: MM44 - LPMM18/1728  Respondent: J D W Todd 15326369  Agent:**
MM44 First inserted then deleted then reinserted! With other housing developments in the adjacent area (+45%) this is excessive. What of the strain on sewage, water supply, broadband speed (already about 1/3 of the nationally accepted minimum) and other essential services? A totally inadequate bus service to Woking and Guildford and with parking at these stations already at capacity will throw even more traffic onto the road network. Traffic at Mays corner, Send Dip Pollesden Lane and Newark Lane will be even more congested at peak times. (A recent traffic survey was made in August when there is no school traffic and half of Surrey are on holiday and so was totally invalid)

Attached documents:

Comment: MM48 - LPMM18/1732  Respondent: J D W Todd 15326369  Agent:

4) MM27 MM41 MM42 MM48 are part of the above observations.

Relevant above is the latest government survey of housing needs in this area which shows a reduction in need of 45%

Attached documents:

Comment: MM2 - LPMM18/265  Respondent: Gayle Leader 15328833  Agent:

We strongly object to this proposed development as it is an inappropriate large expansion that will overload all the local facilities, schools, medical services, public transport, utilities and our already congested, poorly maintained roads.

In addition, since this plan was formulated figures recently released by the government indicate that the local population will not grow as previously thought. This plan needs a to be much reduced to be in line with the latest projected growth figures and to reduce strain on the above services.

Attached documents:

Comment: MM27 - LPMM18/2023  Respondent: R.A. Love 15328865  Agent:

I OBJECT to MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/2019  Respondent: R.A. Love 15328865  Agent:
I am writing to OBJECT to the local plan Main Modifications as outlined below:

I OBJECT to MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive
- 7000 objections to the previous lower number have been ignored
- It is Green Belt containing ancient woodland
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

I OBJECT to MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM42 - LPMM18/2020  **Respondent:** R.A. Love 15328865  **Agent:**

I OBJECT to MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

I OBJECT to MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM44 - LPMM18/2021  **Respondent:** R.A. Love 15328865  **Agent:**
I OBJECT to MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

**Comment:** MM48 - LPMM18/2026  **Respondent:** R.A. Love 15328865  **Agent:**

I OBJECT to MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM9 - LPMM18/2022  **Respondent:** R.A. Love 15328865  **Agent:**

I OBJECT to MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

**Comment:** Other comments - LPMM18/2027  **Respondent:** R.A. Love 15328865  **Agent:**

I OBJECT to Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.
Dear Sir/ Madam,

I am not often motivated to write, but I have seldom viewed such poorly thought through local plan, and now the Local Plan Public Examination.

**I object to the creation of the new north and southbound slip roads to and from the A3.**

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]. The major bottle neck is Send Village, which this plan will on exacerbate.

The main danger is the off slip going North at Burnt Common, this will exacerbated with more people using it.

**I object to Policy A43. Land at Garlicks Arch.**

- There is no proven need for additional 400 new houses on top of the 13,860 already proposed by the borough, and now they have increased that to by 37% to 550.
- The Health Surgery at send cannot cope, the local schools cannot cope. The entire plan is ill conceived.
- It continues to ignore over 7,000 of previous objections.
- There is no proven demand for Travelling Show people plots in this location.
- There are no “exceptional circumstances” exist for removing this site from the greenbelt.
- The land is subject to frequent flooding and is currently flood Zone 2 allocation.
- It will join the villages of Send and Ripley and defeat one of the intended purposes of the greenbelt.
- The roads in send cannot cope and this will add at least 800 extra cars

**I object to Land at Burnt Common London Road, policy A58**

- The exit heading North from the A3 is one of the most dangerous exists, and you want to intentionally put more heavy goods traffic through it.
- They have double the allocation to 14,800 sq m and there is still lots of unused capacity at Slyfield?
- The impact on the surrounding roads will be immense and cause traffic gridlock.
- Nitrogen Dioxide levels are already at dangerous levels.
- It was deleted from the 2014 draft because of the amount of objections made.
- The word “minimum” is changed to the previous maximum in the 2016 plan.
- There is no need to build more industrial or warehouse development in the middle of the greenbelt when Slyfield and Guildford still have empty sites.
**Comment: Other comments - LPMM18/76 **  **Respondent: Robin Hurst 15329345  **  **Agent:  **

**I object to the Limited Consultation Period.**

I find it disingenuous to the last minute inclusion of new sites i.e. Garlick’s Arch with less than two weeks notice, just because it would appear that the developer has offered a new on and off slip to the A3.

**Summary.**

Your plans have blighted my family home for years, the 2014 plan originally put a development at the back of my house, and the 2016 plan changed it to the development at the front of my family home. Now your new plan does both!!!

You ill conceived plans have had a huge detrimental effect on the value of our family home, destroying our views of the farmland at the front and rear. Therefore your poorly thought through local plans have provided uncertainty and anxiety to myself and my family.

As no speed restrictions, speed camera or traffic calming measures on the blind corner heading towards send over the A3 is a accident waiting to happen. As it is we can only turn left when leaving our home and even then it is very dangerous.

You have not addressed the infrastructure requirements such as schools, health centres and hospital capacity, in these proposals, for new homes.

Therefore this plan needs to be thought through, and new alternative proposals need to be looked at.

I trust the above is to your satisfaction, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

**Attached documents:**

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**Comment: MM41 - LPMM18/1643 **  **Respondent: Suzie Powell-Cullingford 15329441  **  **Agent:  **

I wish to object in the strongest terms to the following main modifications to the Local Plan:

1. The increase at Garlicks Arch to 550 homes This site is protected by ancient woodland
2. The addition of the Aldertons Farm site of 120 homes
3. The increase in size of the Burnt Common Industrial site

**Attached documents:**

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**Comment: MM42 - LPMM18/1645 **  **Respondent: Suzie Powell-Cullingford 15329441  **  **Agent:  **

I wish to object in the strongest terms to the following main modifications to the Local Plan:

1. The increase at Garlicks Arch to 550 homes This site is protected by ancient woodland
2. The addition of the Aldertons Farm site of 120 homes
3. The increase in size of the Burnt Common Industrial site

**Attached documents:**
I wish to object in the strongest terms to the following main modifications to the Local Plan:

1. The increase at Garlicks Arch to 550 homes. This site is protected by ancient woodland.
2. The addition of the Aldertons Farm site of 120 homes.
3. The increase in size of the Burnt Common Industrial site.

Attached documents:

Finally the proposed developments MM9 and MM27 will not help but hinder the road congestion. Send will undoubtedly be a cut through from the A3 and Woking, especially when the M25 is at a standstill. Coupled with through traffic and increased car use by the new developments, local people will be unable to travel. If all these developments go ahead, GBC will be creating a horrific conurbation. Small developments can be tolerated by local rate payers but huge developments are totally unreasonable and cannot be supported by the local infrastructure.

Please consider smaller developments throughout Surrey. More housing should be shared throughout Surrey not imposed on a few villages.

Attached documents:

> Dear Sir/Madam

> We wish to object to the proposed planning development MM41 referring to the land at Garlicks Arch, Send Marsh, Policy A43 for the following reasons:-

> Send is already gridlocked in the mornings with traffic using it as a through cut from the A3 to Woking/Guildford. The main road passes the local junior school where cars are parked on both sides of the road causing congestion. Lorries and heavy good vehicles struggle to pass the school. If you agree to build 550 homes on this land, there will be at least 800 extra cars using this road and 300 children requiring schooling, as well as at least 600 people requiring medical appointments at the Villages Medical Centre! The centre already finds it difficult to provide appointments for patients. Also, over the years, GBC have found it difficult to provide secondary schooling to children living in Ripley and Send. Some children have been sent to Woking and even New Haw and Sheerwater for schooling. Any more homes built in Send will have adverse consequences.

> To avoid the congestion of cars travelling through Send, many use an alternative route via Potters Lane which is again, totally unsuitable for lorries and fast cars. Potters Lane is a death trap in the mornings and evenings. There have been numerous accidents at the A3/Potters Lane junction but unfortunately it takes a fatality before people act.

> The land at Garlicks Arch is currently green belt with ancient woodland and therefore should remain as such. GBC should be targeting brown land rather than green belt land. This green belt separates Send and Ripley villages and residents of both villages wish for the two villages to remain separate.
To increase the proposed development by 37% is very excessive and poses a huge drain on the local infrastructure and facilities. The A3 is totally congested most mornings and evenings and also on Saturdays. The local roads are poorly maintained at the moment and with extra use, will require even more maintenance.

I appreciate that development is required as people need houses but 550 is excessive and unmanageable in this area.

I hope that you take note of the points raised and are able to come to a sensible decision. Please don't ignore previous objections.

Attached documents:

Comment: MM42 - LPMM18/4211  Respondent: Gillian Thorpe 15341441  Agent:

In addition the proposal of MM42 at Burnt Common (Policy A58) to increase 7000 to a minimum of 14,800 sq m of industrial and storage use will add more congestion to the surrounding roads, villages and especially the A3. Nitrogen dioxide levels are already dangerous in areas and these developments will only make it more unhealthy.

Attached documents:

Comment: MM44 - LPMM18/4210  Respondent: Gillian Thorpe 15341441  Agent:

We wish to object to 120 new homes proposed on the Alderton's Farm land between Send Marsh and Send. Send cannot accommodate more traffic. During rush hours it is totally gridlocked, especially at the Send traffic lights. GBC are proposing 550 new homes at Garlicks Arch (MM41- Policy A43), 120 new homes at Alderton's Farm as well as houses at Clockbarn, Send Hill and traveller sites. The schools, medical centre and local roads will not be able to cope with the multiple developments. The roads will be totally gridlocked, and any small lanes will be used as alternative routes. An increase of 45% is excessive. Our infrastructure cannot cope now.

Attached documents:

Comment: MM9 - LPMM18/4212  Respondent: Gillian Thorpe 15341441  Agent:

Finally the proposed developments MM9 and MM27 will not help but hinder the road congestion. Send will undoubtedly be a cut through from the A3 and Woking, especially when the M25 is at a standstill. Coupled with through traffic and increased car use by the new developments, local people will be unable to travel. If all these developments go ahead, GBC will be creating a horrific conurbation. Small developments can be tolerated by local rate payers but huge developments are totally unreasonable and cannot be supported by the local infrastructure.

Please consider smaller developments throughout Surrey. More housing should be shared throughout Surrey not imposed on a few villages.

Attached documents:
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<thead>
<tr>
<th>Comment: MM45 - LPMM18/639</th>
<th>Respondent: Redmond Neale 15342305</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I strongly object the A64 Site Proposal in Normandy (Glaziers Lane).</td>
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<tr>
<td>Stop trying to ruin our beautiful village / green spaces for financial gain. This is getting rather repetitive now!</td>
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<tr>
<td>Plenty of other places outside Normandy that are not green belt where the houses can be built. Happy to show you these.</td>
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<td>There are no exceptional circumstances, a application has already been denied on the site, there is a infrastructure deficit, AONB would be ruined, there would be no community benefit, wildlife including hedgehogs and rare newts would be killed off - the list goes on!!</td>
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<td>I’m not sure who makes the decision to put sites in this plan but personally I think there job needs reviewing as it’s clearly not a suitable site.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM2 - LPMM18/2625</th>
<th>Respondent: Mr John Kettle 15349761</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I wish to object to the process of developing the Guilford Borough Council Local Plan:</td>
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<tr>
<td>No. of Houses(MM2)- The current version of the Plan is based on the need for 12,600 houses over the Plan period. However, the Office of National Statistics (ONS) had previously provided a figure of 11,142 which was used in a previous version of the Local Plan, and have now (20/9/2018) revised this figure to 6,635 houses. The plan is therefore totally unrealistic and as no legal basis for consideration.</td>
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<th>Comment: MM40 - LPMM18/2627</th>
<th>Respondent: Mr John Kettle 15349761</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Policy A35 Former Wisley Airfield (MM40)</td>
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<tr>
<td>As the Secretary of State, on 13/6/18, dismissed the planning application appeal for development of this site, it is extraordinary that the GBC Local Plan includes this site for development. With the latest ONS projections for housing growth there is no justification for this site to be included in the Local Plan.</td>
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<td>I request that the Public Examination of the Plan by the Planning Inspector be re-opened</td>
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<td>Attached documents:</td>
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<th>Respondent: Mr John Kettle 15349761</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Policy P2 Green Belt (MM9)</td>
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<tr>
<td>66% of the Local Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt.</td>
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</table>
As the latest ONS housing projections indicate a significantly lower housing requirement the “exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist”.

Attached documents:

Comment: MM41 - LPMM18/249  Respondent: Mr John Peed 15350689  Agent:

The number of additional houses proposed is excessive and has increased again! (400 to 550) - it would appear that the previous objections have been ignored. This area is Green Belt and contains ancient woodland. The plan clearly implies over development of this area and will in effect join up Send and Ripley. The area has a history of flooding, and a high volume of extra cars will inevitably block adjacent roads. The Villages Medical Centre can only just cope with local demand so would we swamped by additional demand.

Attached documents:

Comment: MM42 - LPMM18/252  Respondent: Mr John Peed 15350689  Agent:

MM42 - Why has this proposal, despite being deleted from the 2014 plan increased twice, effectively doubling the area? This is by far the largest new industrial allocation in any village in the borough and so is totally unjustified.

Why is yet more Green Belt being sacrificed when Slyfield has unused capacity?

The above proposal is in addition to the 25% capacity at Send Business Centre - why is the rural nature of Send being systematically destroyed?

Narrow surrounding roads will inevitably be gridlocked with heavy trucks and machinery, adding to the already dangerous levels of nitrogen dioxide from diesel vehicles.

Attached documents:

Comment: MM44 - LPMM18/251  Respondent: Mr John Peed 15350689  Agent:

Why has this proposal been re-inserted despite all previous objections?

What special circumstances are mitigated within this proposal justifying this development?

This development will almost certainly detract from the heritage buildings at Send Marsh Green

Additional traffic will increase pressure on Send Crossroads.

An additional 770 houses to the currently 1700 in Send will overwhelm the infrastructure.

Attached documents:
Comment: MM9 - LPMM18/250  Respondent: Mr John Peed 15350689  Agent:

The special circumstances justifying destruction of the Green Belt appear to be very subjective and can be breached at any time.

The policy appears to represent an open invitation to developers to financially profit at the expense of local residents.

Attached documents:

Comment: MM45 - LPMM18/1006  Respondent: Brian Oliver 15350817  Agent:

Guildford Local Plan, Site A64

I wish to register my objection to this proposal, as it relates to Normandy and, in particular this plan to put 100 extra properties in Green Belt Land near Wanborough Station. It would exacerbate the already poor flow of traffic along Glaziers Lane - the state of which has previously led to the withdrawal of two previous applications. The reasons given for withdrawal included the following and each would apply to [unreadble text] to A64: -

1. "Exceptional Circumstances" were and are not demonstrated

2. O.N.S. forecasts implay that the Plan overstates by nearly a half the projected extra housing requirement.

3. Brownfield sites not being part of the plan. If in comparison with building on our cherished Green Belt some extra costs are involved, I feel sure that the enviromental benefits are well worth it.

4. Infrastructure: The Lane is not equipped for such an increase in traffic as over 100 new properties would generate - as I write blocked drains and some flooding are clearly evident features.

5. Merging two discrete and settled communities such as Normandy and Flexford, having [unreadble text] sizes and characters, would be non viable and not function satisfactorily as an organic whole.

Attached documents:

Comment: MM2 - LPMM18/4820  Respondent: Neal Stone 15353633  Agent:

I disagree with your proposals to inset several towns and villages from the Green Belt, making development that much easier in such places. I find it entirely unjustified and shocking - what kind of legacy does it set up for the next generations? Looking at other sites e.g. urban, brownfield and windfalls, green field development in the protected Green Belt is entirely unnecessary, especially since urban brownfield is given priority under the new S3 Policy. Furthermore I understand that the latest ONS figures show a much smaller housing requirement (which can be met by higher priority sites). No “exceptional circumstances”, as required by the NPPF, have been offered for any Green Belt development or for “insetting” most of the borough’s villages such as the Horsleys.

Attached documents:
Comment: MM23 - LPMM18/4822  Respondent: Neal Stone 15353633  Agent:

The changes to Policy D1 dilute some vital social requirements and deletion of Policy D4 is not justified as it met the soundness test. Less specific text gives a freer hand to developers to get away with socially unsustainable building - a comment which can be read for many of your proposed changes.

I understand that many people who took place in feeding back to the first consultation have not been reminded that this new consultation is taking place, surely bringing its legitimacy into doubt.

Attached documents:

Comment: MM3 - LPMM18/4821  Respondent: Neal Stone 15353633  Agent:

Policy S3 should be strengthened to focus on the prioritising the Guildford urban area inspiring urban regeneration over building on our precious Green Belt.

Attached documents:

Comment: MM45 - LPMM18/1016  Respondent: Robert Gray 15357089  Agent:

Ref: Guildford Local Plan: Strategy & Sites Main Modifications MM45 POLICY A64

I object to the modification of MM45 POLICY A64.

I strongly object to this land's inclusion in the local plan for the following reasons:

It is a Green Belt site and is therefore protected. The need for violating this does not appear to have been proven.

Permission to build on this site has already been denied.

105 homes equate to approximately 210 cars, the roads are already clogged, and the entrance to the development will be on one side of a hump back bridge, which will be hazardous.

105 homes on a package of land that small is not sympathetic to the current housing in the area.

The local plan does not appear to take on board the likely post Brexit case that less housing will be needed.

Attached documents:

Comment: MM41 - LPMM18/3883  Respondent: Ron Best 15358625  Agent:

As per your letter of 7th September, 2018, I wish to register my objections to the following main modifications to the GBC Local Plan:

MM41 Garlicks Arch (Policy A43): I am astonished that, despite the 7000+ objections to the earlier proposal of 400 houses, you now propose an additional 150. The local roads are already over-used, especially in the rush hour/school
run’, the proposal is an incursion into the Green Belt and will ensure that there is no green 'buffer zone' between Send Marsh (where I live) and the A3. If the local facilities (schools, medical centre etc) were going to be at breaking-point with 400 new houses, the effects of a further 150 will be completely unsustainable.

Attached documents:

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Comment: MM42 - LPMM18/3884  Respondent: Ron Best 15358625  Agent:

**MM42 London Road, Burnt Common (Policy A58):** This proposal worsens the situation by reinstating and extending a development which was removed at an earlier stage when objections established that it was unfeasible. I am alarmed at the doubling of space for industrial units, especially as this is described as 'a minimum'. We all know what that means: 14,800 sq. m. is but a start! My understanding is that there are established industrial areas within the Borough (including the Tannery which is within our village, where a 25% increase in units is planned) and Slyfield in Guildford which could absorb this growth without committing another greenfield site. The increased traffic to and from the site will further add to the jams which are already characteristic of our village at certain times of the day.

Attached documents:

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Comment: MM44 - LPMM18/3885  Respondent: Ron Best 15358625  Agent:

**MM44 Alderton's Farm (Policy A63):** This will sacrifice greenbelt land which currently constitutes an important 'breathing area' between Send Marsh Green and May's Corner. My wife and I walk this route almost daily, but already suffer the consequences of heavy traffic noise and exhaust fumes. Together with the Garlicks Arch and London Road developments, our roads will be swamped with traffic - May's Corner is already a bottleneck at certain times of the day - and the addition to the traffic on Send Road will add to the daily blockages across Broadmead and into Old Woking. This proposal is antisocial and unhealthy.

I beg you to reconsider.

Attached documents:

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Comment: MM45 - LPMM18/2380  Respondent: Ian Rose 15358945  Agent:

**Re: Local Plan Consultation Document: Main Modification 45, Flexford/Normandy Site A64**

I am writing to register my objections to the large number of proposed houses within the above Site which would take the Flexford settlement across the natural barrier of the railway line barrier and the Normandy settlement by building on designated "red rated" Green Belt land at Site A64 for the following reasons:

1. **Green Belt**

The intention and importance of sensitive Green Belt land is to ensure that the hamlets and villages within it are separated by openness and are not conjoined by large scale housing developments such as those proposed adjoining the east side of Glaziers Lane near Wanborough Station.
The proposed development of Site A64 will increase the number of homes by 7% in the settlement area of Normandy which is designated as Green Belt.

Previous Planning Inspectors have declined applications on broadly this site and consider that the green fields contribute to the openness of the Green Belt with views to the Surrey Hills AONB.

In June 2015 the Conservative Government and the Prime Minister in their election manifesto said ‘we will always protect the Green Belt and make sure planning decisions are made by local people and only in exceptional circumstances when there are no other options would the Green Belt be allowed to be built on.

Guildford Borough Council has not only publically demonstrated that there any exceptional circumstances that could be applied to this site.

2. Destruction of rural environment:

I strongly object to the proposed development of an additional 105 houses within the Green Belt and is currently green field pasture/agricultural land.

The Green Belt is in place to check unrestricted sprawl of built up areas which will occur with this proposed development leaving only a railway line to separate the hamlets of Flexford and Normandy from joining up.

It is also there to safeguard the countryside from the enroachment of building development. With regard to the proposed modification 45 to the Local Plan document these principles appear to have been completely disregarded.

3. Infrastructure

The existing road of Glaziers Lane flanking the west side of the proposed site for the 105 houses is classified as a minor ‘C’ class roads and will not be able to cope with the increase in additional traffic generated by this large development. At present Glaziers Lane (C60) does not have a continuous footpath on any one side of the road from its junction with Flexford Road and the A323 Aldershot Road and pedestrians have to cross the road twice at two very dangerous points on this busy road.

One is the north side of the humped back railway bridge at Wanborough Station and the other one is between numbers 38 to 43 Glaziers Lane. If the proposed number of houses are built with resulting large increase in traffic there would be a need to have additional footpaths constructed over the length of Glaziers Lane in the interests of road safety to pedestrians.

The A323 Guildford Road at commuter times frequently build up through Normandy at present due to the increase of large developments of houses within the Ash Parish and Rushmoor area.

The increase of traffic travelling up Wanborough Hill/Westwood Lane (C16) to join the A31 will severely increase the queues of traffic travelling east to Guildford or west to Farnham and also the B3006, Puttenham Heath Road to join the A3. These roads are already gridlocked at peak times now without the additional traffic generated by the proposed development.

4) Wyke Junior School, School Lane, adjoining A323, Aldershot Road:

If this development is approved there will be an element of young children living there and as a result there will be increased pressure on the school to provide places for them which is already at its maximum capacity.

Additional finance will have to be provided in order to expand its classroom capacity.

The proposed development, if approved, will generate even more additional traffic on Glaziers Lane and the A323, Aldershot Road and the existing traffic queues at peak times will exacerbate the traffic problems at the start and end of school hours.

5) Flooding Issues:
The area in Glaziers Lane (C60) where the Hoe stream crosses underneath the road between Numbers 68 and 76 on the west side and Numbers 38 to 43 on the east side is subject to flooding and is designated as an area liable to flooding on the Enviromental Agency maps. The flooding occurs when there is heavy continuous rainfull and can occur summer or winter. The two main causes of this flash flooding is the rainwater runoff from houses and driveways with drains connected to the main sewer. This causes the **150mm main sewer** running south to north to surcharge causing the road and surrounding land and gardens to flood.

The 150mm connects into a 225mm main sewer between numbers 38 and 48 which is also of unsufficient capacity the sewer also surcharges at this point causing additional flooding. **Thames Water** is well aware of this flooding problem and there would need to be a major increase in sewer capacity if the proposed housing development takes place.

There has been a previous application to build 70 houses on this site which **Thames Water** objected to as the existing main sewer of 150mm diameter is of insufficient capacity to cope with the proposed number of homes and I am not aware of any proposals to increase its capacity. The proposed new developments would detrimentally increase the risk of flooding the above mentioned location causing great distress to the residents currently living there.

6) Brown Field Sites: More consideration should be given to developing brown field sites of which there are a considerable number listed, a proportion of which could be considered for housing to meet the future 5 year window within the Main Modifications 45 document.

**Attached documents:**

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**Comment: MM2 - LPMM18/3685  Respondent: John Burns 15359905  Agent:**

I object to the changes made after the last consultation for the new Local Plan: -

MM2: The housing requirement figure used by the Local Authority is different from that given by the Office of National Statistics; ie 301 per year as opposed to 672 pa. The latter as used by the L.A. to derive overall housing numbers in the future therefore has a major skew which is incorrect and unnecessary; we regard this as very wrong of the Council to use what is most probably a grossly inaccurate figure for their overall assessment.

In addition we cannot see why Guildford Borough should sustain Woking Borough’s ‘unmet’ housing requirement; the same query obtains in regard to that figure – not given anywhere? – as the previous comment denotes.

**Attached documents:**

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**Comment: MM23 - LPMM18/3689  Respondent: John Burns 15359905  Agent:**

MM23: there is a reference, D1 para 13 – 15 that appears to state that final scheme approvals are to be made by the developers. There can be no authority in such a written clause as it would mean the developers running the show? Either this is a case of the lunatics taking over the asylum or the wording is ambiguous / in error?

**Attached documents:**

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**Comment: MM37 - LPMM18/3690  Respondent: John Burns 15359905  Agent:**

1601 of 2554
MM37: Blackwell Farm access; a new road widening is inferred. This is unacceptable as it would lead to loss of trees that line the lane right now and thus would impact on the nearby AONB.

Attached documents:

Comment: MM41 - LPMM18/3691  Respondent: John Burns 15359905  Agent:

Garlicks Arch: the loss of ancient woodland I still maintain to illegal. These areas have been recorded since the Doomsday Book and are coveted by residents and Woodland Trust alike. The proposed site furthermore relies on matter that are out of the L.A’s control; alterations to the access to the A3. Until that infrastructure is decided / put in place there is no sense in the unnecessary destruction which the proposal for G.A hold.

Attached documents:

Comment: MM50 - LPMM18/3687  Respondent: John Burns 15359905  Agent:

MM47: wildlife and biodiversity; this appears to be just an obstacle to be got around by developers. This conflicts with the guidelines laid down in the NPPF which stipulate that wildlife and biodiversity must be protected at all times, not chipped away because they happen to be in the way of a developers greater scheme. Similarly, no emphasis is placed on Areas of special scientific interest, such those that exist all around the WW2 Wisley / Ockham Airfield aka Three Farms Meadow; I do think that the L.A. has the right to judge on these areas, it should be the judgement of independent specialists. Either way the allotted areas of SSI have shrunk from the size they were previously. That is unacceptable and I feel should be legally contested at a Judicial Review. At the same time the overall area of the proposed site applied for by WPI ltd has grown by over 20 ha. The latter is equally unacceptable due to the impact on the ancient commune of Ockham and Water Lane, as well as the loss of even more important grade 1 agricultural land.

Attached documents:

Comment: MM9 - LPMM18/3686  Respondent: John Burns 15359905  Agent:

MM9; Rural exception sites / infilling around villages: there does not appear to be any boundaries placed on this activity. It could resemble a free for all and thus ruin the ancient character and social environment of places such as Ockham and Ripley – the latter has already had to sustain major infilling with resulting loss of social open space and local employment facilities.

Attached documents:

Comment: Other comments - LPMM18/3693  Respondent: John Burns 15359905  Agent:
GBC have not observed matter concerning brown field development, especially in Guildford town centre. Private developers have been allowed to cherry pick many / all of these, where it would have been much more expedient for these sites to have been acquired either by compulsory purchase or a joint venture for municipal builds.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment:</th>
<th>Other comments - LPMM18/3694</th>
<th>Respondent: John Burns 15359905</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I must also emphasise on the overall assessments for new applications that no where has any incisive scientific test(s) been executed; ie carbon audits, complete pollution forecasts, natural habitat and wildlife losses photosynthesis and agricultural losses, proper cost / benefit analyses.</td>
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<td>I remain bewildered still at contradictions with the new Plan: in an age affected by Global warming, Austerity and overpopulation the remedies are for crass speculative building at random it would seem. Alongside massive destruction of plant life, wild life, natural habitat, agricultural land and social environments. This cannot be right.</td>
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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment:</th>
<th>MM1 - LPMM18/4016</th>
<th>Respondent: Sylvia Newton 15366721</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I object to MM1</td>
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<tr>
<td>The proposed increase in the required number of dwellings is excessive and unsubstantiated. The plan fails to take account of the Borough's need to preserve its high proportion of designated Green Belt land and historic woodland.</td>
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<tr>
<td>The proposed housing increase will have a massive negative impact on the villages of Send and Ripley be devastating for the residents of Send Marsh and Burnt Common.</td>
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**Attached documents:**

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<thead>
<tr>
<th>Comment:</th>
<th>MM12 - LPMM18/4019</th>
<th>Respondent: Sylvia Newton 15366721</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I object to MM 12</td>
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<tr>
<td>The change in wording in policy para's 1,2(c), 3(d), and 4. The wording 'The measures must be agreed with Natural England should be retained. 4.3.60 should retain the wording 'must be agreed with Natural England'. Reasoning - to protect against the erosion of the Green Belt.</td>
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**Attached documents:**

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<thead>
<tr>
<th>Comment:</th>
<th>MM22 - LPMM18/4020</th>
<th>Respondent: Sylvia Newton 15366721</th>
<th>Agent:</th>
</tr>
</thead>
</table>
I object to MM22
To the proposals for Gosden Hill and Wisley airfield to be classified as new local centres.

Attached documents:

Comment: MM23 - LPMM18/4021  Respondent: Sylvia Newton 15366721  Agent:

MM23
Policy D4 1(b), l(m) and 2(a) and (b) should be retained in order to ensure that new development respects existing open space vistas and takes into account factors such as air and noise pollution.

Attached documents:

Comment: MM25 - LPMM18/4022  Respondent: Sylvia Newton 15366721  Agent:

I object to changes in MM25
Green Belt land should be regarded as an irreplaceable heritage asset.

Attached documents:

Comment: MM27 - LPMM18/4023  Respondent: Sylvia Newton 15366721  Agent:

MM27
The traffic assessment is inadequate and was conducted at a time when traffic would be at its lightest. The increased traffic implications of a huge development will have a negative effect on the whole borough let alone the local communities.

Policy MM27 needs to provide an accurate assessment of the transport implications for the A247, A3 and M25 with the proposed increases in both housing and industrial areas at Wisley, Gosden Hill and Send Marsh/Burnt Common.

Attached documents:

Comment: MM41 - LPMM18/4024  Respondent: Sylvia Newton 15366721  Agent:

I object to MM41 Land at Garlicks Arch, Send (policy A43)
I object to any number of dwellings let alone the increase numbers from 400 to 550. There are no special circumstances to develop the land including the Governments flawed guess at housing need or money as was the case with the last two planning application on the site 14/P/00219 and 16/P00783 for just 9 and 25 houses. The land is green belt and should remain so out of public heritage and longterm interest. The site is in the "SPA" zone. There is insufficient infrastructure to support any development. There are no local amenities other than one petrol station to support any development.
There are no nearby schools with spaces or many spaces in any distant schools to support development. The development would bring possibly over 1000 extra cars into an area already traffic saturated. There will be an increase in pollution from the extra stationary traffic which will cause health issues. The site is at the limits for emergency services to attend quickly so lives will be put at risk. There is only one local medical centre which is at full capacity at present. There is ancient woodland and protected trees on the site. These will be put in harm. Any development in this area that is inappropriate and would be detrimental of Send Village and Guildford as a borough.

I object to MM41(0a) to the main access being off A247 Clandon Road. The A247 is already very dangerous when trying to pull out onto or even off it more cars will make it near impossible. We feel we will end up being house bound along with many of our neighbours. The road is extremely dangerous to cross on foot as there are no crossing places or even footpaths on part of it more traffic will add to this danger. The traffic survey must be flawed as the A3 cannot take the extra traffic southbound as it is often stationary into Guildford and the A3 is backed up from the M25 to Burntcommon daily so any extra cars will add to this congestion and pollution. The roads to Ripley and Send are at capacity with commuter traffic.

I object to MM41(0b) to the through road from the B2215 Portsmouth Road and the A247 to provide an alternative route that relieves pressure on Send Marsh roundabout. This cut through will destroy the pleasant country aspect enjoyed by many residents. The huge increase in traffic will produce excessive noise and air pollution. If Send Barns (Burntcommon) roundabout is under pressure don't build 550 new homes nearby. The increased road usage is likely to cause accidents if not fatalities. There will be a loss or damage to established trees and ancient woodland.

I object to MM41(0c) to the Permeability for pedestrians and cyclists into the development from the B2215. Giving better access to a death trap is not acceptable. There are no close amenities for pedestrians to walk too so better access is pretty pointless.

I am in FAVOUR of to MM41(0d) Necessary and proportionate contribution towards an off-site walking and cycle network to the village centre of Send, the Burntcommon Warehouse site and Clandon railway station. Asking for a contribution to fix the problems Guildford Borough Council is creating for itself by supporting this development is sensible.

The contribution should also consider work to improve and refurbish the pavement/cycle way to Guilford Town Centre. The contributions should consider the need for a number of light controlled crossing places to safely get to Send. There are no adequate cycle lanes so major road works and moving of pavements will be necessary. Access to the warehouse will require lights at Burntcommon roundabout and a fair amount of extra pavement and a whole new cycle way which should be extended to the one in disrepair along the A3. It is just over a mile to Clandon and the speed limit will need to be reduced and a number of light controlled crossing places need to be installed on the A247. Street lighting is also essential. A survey into road widening for a cycle path undertaken as the pavements are too narrow to accept pedestrians and cycles and there are no footpaths on both sides of the road so some compulsory purchases for land will need to be made to make the route safe enough so not to endanger lives.

I object to MM41(0e) Necessary and proportionate contribution towards mitigation schemes to address the otherwise adverse material impacts on communities and the environment, including Send, Ripley and West Clandon. Guildford Borough Council are not acting in the best interests of the public acknowledging there will be adverse material impacts on communities and then believing collecting contributions is better than looking after this very community in the first place. There is no amount of contributions that can fix the environmental damage this development will cause in the short or long term. Can Guildford Borough Council expect to collect a contribution proportionate enough to help the impact on hospitals, emergency services or that is proportionate to cover the loss of a life because they will be further stretched beyond coping. No amount of money to the council will bring back a life. How will Guildford Borough Council be able to collect a proportionate contribution to build new schools or extend old ones prior to the 100's of new children moving into these new properties.

I object to MM41(0f) Increase landscaping buffer/strategic planting etc
No amount of planting or landscaping will hide the A3 noise and air pollution from these new houses or these houses and their extra cars noise from the or surrounding roads. There is not enough room for 550 dwellings and the trees needed to
hide them. Who will continue to take care of this extra landscaping, buffers and strategic planting when the developer departs and who pays as it sounds very expensive.

Attached documents:

**Comment: MM5 - LPMM18/4017  Respondent: Sylvia Newton 15366721  Agent:**

I object to MM5
[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] from it.

Attached documents:

**Comment: MM9 - LPMM18/4018  Respondent: Sylvia Newton 15366721  Agent:**

I object to MM9
Any residential and commercial development proposals within the Green Belt should as a matter of policy and public interest not be approved.

Attached documents:

**Comment: MM2 - LPMM18/2464  Respondent: Alison Gee 15370593  Agent:**

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:
There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.

New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads, (eg through East Clandon, which are totally inadequate for any increase in traffic, especially large vehicles) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

...
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
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The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

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MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

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MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

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**Comment:** MM23 - LPMM18/2467  **Respondent:** Alison Gee 15370593  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

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In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

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**Comment:** MM3 - LPMM18/2465  **Respondent:** Alison Gee 15370593  **Agent:**
MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

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MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

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Attached documents:

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Comment: MM32 - LPMM18/2469  Respondent: Alison Gee 15370593  Agent:

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MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

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MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

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**Attached documents:**

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**Comment: MM44 - LPMM18/2473  Respondent: Alison Gee 15370593  Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment: MM9 - LPMM18/2466  Respondent: Alison Gee 15370593  Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment: MM40 - LPMM18/2313  Respondent: C R Woodland 15373153  Agent:**

I continue to be concerned about A35 Wisley Airfield. The most suitable use for the site would be as a park-and-ride 'hub' with buses going to Guildford, Woking (via Send), Heathrow and Gatwick Airports and possibly other places such as Effingham Junction as well. This would reduce traffic flows on the M25, A3 and other local roads.
I object to Main Modifications MM42, MM43 and MM44 to the local plan as much of the development proposed is on the Green Belt and insufficient consideration has been given to the constraints which ought to be applied with regard to infrastructure, roads and schools are at capacity already. The Main Modifications do not seem to have taken into account the closure of Ripley School, which has reduced the total number of school places in the area. With regard to roads traffic levels and pollution are already unacceptable, with nitrogen dioxide at dangerous levels and the further housing in the Main Modifications will only bring further cars and lorries to the local roads.

In particular I object to MM43, the use of land at site A43 Garlicks Arch. This is a green field site with no "exceptional circumstances" to justify ignoring all of the many previous objections. This land contains ancient woodland which must not be removed without planting replacement trees. The additional housing in MM43 will only bring further cars to the already congested local roads.

I object to MM42 (Policy A58) at Burnt Common which is now a new allocation for a minimum of 14,800 sq m of industrial or storage. The previous figure of 7,000 sq m looked like a mistake and the word should have been 'maximum', as in the 2016 plan. There is no justification for this size of industrial estate in Send or any other village in Guildford Borough. There are no special circumstances and it also contradicts Green Belt Policy MM9. Slyfield and Guildford have empty units and the site at Burnt Common is totally unsuitable for a large industrial estate.

I object to MM44, the use of land at Alderton's Farm, Send Marsh Road Policy A63. This is a green field site with no "exceptional circumstances". Once again roads and a number of schools are at capacity already. With regard to roads traffic levels and pollution are already unacceptable and the additional housing in MM44 will only bring further cars to the already overcrowded local roads.

I continue to support in principle the idea of a new junction with access to and from the A3 in both directions somewhere between Burpham and Burnt Common, however the A3 changes and Clandon slip roads do not adequately address the likely future traffic levels, particularly with regard to right turn movements (A3 Southbound to Burnt Common and Clandon to A3 northbound). The correct place for a completely new junction is near to site A25 Gosden Hill Farm, using both sides of the London Road dual carriageway to access the new junction from Burnt Common roundabout.
I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   3. There is too much reliance on A3 improvements and these are beyond the council’s control
   4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technologically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.
The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
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6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
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10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
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The Plan is unsound and should be re-examined.

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Attached documents:

Comment: MM45 - LPMM18/2147  Respondent: Christine Fordham 15383425  Agent: 

MM45 Policy A64 Houses to be built on Glaziers Lane
My objections to building of 105 houses are the following.
More traffic through Normandy
More pressure on the local primary school (bigger classes)
More time waiting for an appointment with the doctors and nurses
The loss of Green Belt land

A resident of Normandy since 1995

Attached documents:

Comment: MM2 - LPMM18/4777  Respondent: Bernard Callanan 15383745  Agent: 

MM2 - current housing figures in the plan are exagerated and need revising.

Woking's unmet housing needs should be met by Woking & not forced on Guildford to provide along with it's own allocation.

Attached documents:

Comment: MM9 - LPMM18/4779  Respondent: Bernard Callanan 15383745  Agent: 

MM9 - it is unacceptable to lose any more Green Belt while there are Brown field sites available. Prime example is site A22, land north of Keens Lane is Green Belt land & should remain as such. There are no special circumstances to remove this area from Greenbelt so why are the Government guidelines not being followed? There are NO special circumstances to develop this land, just greedy, over zealous developers.

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1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/3891  Respondent: Oliver Stewart 15389697  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.
Comment: MM23 - LPMM18/3898  Respondent: Oliver Stewart 15389697  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Comment: MM3 - LPMM18/3889  Respondent: Oliver Stewart 15389697  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Comment: MM31 - LPMM18/3892  Respondent: Oliver Stewart 15389697  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.
MM31 There appears to be no allocation for an all-direction bus interchange.

Comment: MM32 - LPMM18/3893  Respondent: Oliver Stewart 15389697  Agent:

MM32 A height limit for White Lion Walk is required.

Comment: MM33 - LPMM18/3894  Respondent: Oliver Stewart 15389697  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Comment: MM35 - LPMM18/3895  Respondent: Oliver Stewart 15389697  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Comment: MM41 - LPMM18/3896  Respondent: Oliver Stewart 15389697  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Comment: MM44 - LPMM18/3897  Respondent: Oliver Stewart 15389697  Agent:
The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/3890  Respondent: Oliver Stewart 15389697  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM41 - LPMM18/5312  Respondent: Roderick Hutchison 15390273  Agent:

I raise the following objections:

1) MM41 Land at Garlicks Arch, Send Marsh, Policy A43
The increase from 400 to 500 homes is excessive – I objected to the lower total, but this has been further increased. Local schools and medical facilities, already very stretched, will be further overloaded. Yet more traffic will clog the local roads.

Attached documents:

Comment: MM42 - LPMM18/5314  Respondent: Roderick Hutchison 15390273  Agent:

3) MM42 Land at Burnt Common, London Road, Send Policy A58
This will add significant volumes of HGV traffic on local roads which are already struggling to cope. I can’t see the need for additional industrial development locally in Send.

Attached documents:

Comment: MM44 - LPMM18/5313  Respondent: Roderick Hutchison 15390273  Agent:

2) MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63
I previously objected to this development and was relieved to see it deleted from the previous version of the Plan, but now re-instated. The local infrastructure is already saturated and this will add significantly to the loading on roads, schools and the medical practice. It is already very difficult to get appointments with named doctors at the medical practice and adding more homes will make this even worse. The roads around Send Marsh are already very congested at rush hours and this development will make matters worse.
Concerning both of the above proposals, the Office of National Statistics has recently downgraded its estimates of population growth, and this needs to be factored into GBC’s plan….the basis of the plan seems to be on an over-inflated view of future requirements.

Attached documents:

Comment: MM45 - LPMM18/3085  Respondent: Judith Baker 15390817  Agent:

Re: MM45 Policy A64

I am writing to you to object to the proposed plan of building 105 new houses in Glaziers Lane Normandy.

1. Building on Green Belt – this proposed site is listed as green belt land – building on this would mean destruction of habitats which would have an detrimental effect on our wildlife -
2. I would like to know why you cannot build on the many brown listed sites which are listed on your website.
3. Surrey Hills AONB – this proposed site would have a adverse impact on the vista from the Hogs Back in the AONB
4. A large site like this would place long term strain on our community – our roads are busy and Glaziers Lane is very narrow at the railway bridge, an increase of traffic would be a nightmare and this ‘Lane’ would not cope especially at the bridge which would be next to the entrance of the proposed site. Our GP surgery and local school would be come over subscribed – it is already difficult to get an GP appointment.
5. Wanborough Station – I would like to make the point that only an able person can get on the platform at Wanborough Station – if you are a disabled person or a mother with a pram/pushchair there is no access to the platform for trains going to Guildford. So if the proposed site was chosen for this facility you would need to improve the Station by installing a lift.

Your proposed new housing development threatens the rural character of Normandy – we must try and save our countryside, stop sealing our green belt land not just in our village but all over our county -

Attached documents:

Comment: MM27 - LPMM18/4068  Respondent: Marian Tarrant 15391329  Agent:

I object to MM27, MM41, MM42, MM48, Transport Strategy.

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

Attached documents:

Comment: MM41 - LPMM18/4050  Respondent: Marian Tarrant 15391329  Agent:
I object to MM41 (Policy A43, Garlick’s Arch. Send Marsh/Burnt Common/Ripley).

Because the addition of a further 150 homes making 550 in total (an increase of 37% is excessive).

Because, the 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. At June 2017 we had 500 houses and 10 Traveller/Show people plots. There were 7,000 objections to the smaller development which I feel has been ignored. This number of objection must be taken into consideration!

I object because GBC have exaggerated the need for the 12,426 houses in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.

Because, this site is on Green belt, permanently protected by NPPF to prevent the merging of settlements ie Ripley/Send Marsh/Send. There are no exceptional circumstances to take this site out of the Green Belt. The site is covered in Ancient Woodlands, containing trees that have stood since the 16th Century, this area must be conserved for future generations.

Because, this site is subject to flooding and has a flood zone 2 allocation.

I object to MM41 because of the increased pressure on local facilities, Doctors, Schools etc. that 500+ homes would bring to Send.

550 new homes would generate circa 60 additional children to be schooled. Send school no capacity for these extra pupils and Ripley school has been closed. Circa 1,375 folk would require GP services, where will they be provided?

Because of the additional traffic this will create. There are circa 1,700 houses in Send. The proposed developments at Garlick’s Arch 550, Clockbarn 60, Winds Ridge 40, Plus Alderton’s Farm 120. Adds 770 new homes. An increase of 45%. This is excessive for our roads and indeed the infrastructure of our Village.

I object to MM27, MM41, MM42, MM48, Transport Strategy.

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

Attached documents:

Comment: MM42 - LPMM18/4061  Respondent: Marian Tarrant 15391329  Agent:

I object to MM42 (Policy A58, Burnt Common. Warehousing and Industrial units).

Because, of the increase from 7,000sq m. to 14,800sq m. of industrial and storage use. Which is not required. Employment Lands Needs Assessment (ELNA) 2015 shows an 80% reduction from the previous ELNA carried out by GBC in 2013 for employment space.

I object because Industrial and Warehousing sites and units are still available at Slyfield and in Guildford. So surely expanding existing Brown field industrial areas is better than creating a new one on Green Belt Land. Which contradicts MM9!

I question why the Cassidy Slyfield Ltd. North Slyfield site, allocated in 2014 By Guildford Council for Industrial and Warehouse use, was withdrawn from the Local Plan?
Because, heavy traffic would be attracted from the M25, A3 and the A247, which is not suitable for commercial traffic. The A247 passes the entrances to Send school and the Villages Medical Centre. The additional traffic will increase dangerous Nitrogen Dioxide levels.

Because of the additional traffic this will create. There are circa 1,700 houses in Send. The proposed developments at Garlick’s Arch 550, Clockbarn 60, Winds Ridge 40, Plus Alderton’s Farm 120. Adds 770 new homes. An increase of 45%. This is excessive for our roads and indeed the infrastructure of our Village.

**I object to MM27, MM41, MM42, MM48, Transport Strategy.**

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

**Attached documents:**

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**Comment:** MM44 - LPMM18/4062  **Respondent:** Marian Tarrant 15391329  **Agent:**

**I object to MM44 (Policy A63, Alderton’s Farm, Send Marsh Road).**

Because the proposal for 120 houses was previously deleted from the earlier draft plan due to the objections levelled. The reintroduction of this, is equivalent of having a second referendum on leaving the EU. The people spoke, respect their wishes!

Because this is Green Belt Land with no special circumstances for development. Which contradicts MM9!

Because of the additional traffic this will create. There are circa 1,700 houses in Send. The proposed developments at Garlick’s Arch 550, Clockbarn 60, Winds Ridge 40, Plus Alderton’s Farm 120. Adds 770 new homes. An increase of 45%. This is excessive for our roads and indeed the infrastructure of our Village.

**Attached documents:**

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**Comment:** MM48 - LPMM18/4071  **Respondent:** Marian Tarrant 15391329  **Agent:**

**I object to MM27, MM41, MM42, MM48, Transport Strategy.**

Because we have no verified assessment from Guildford Borough Council of the Traffic implication these modifications will impact on Send.

Common sense tells me development on the scale proposed in Send and wider a field at Gosden Hill, Wisley and Ockham. Plus the proposed M25/A3 Junction will increase traffic in our Village and with it the problems it brings.

**Attached documents:**
Comment: MM41 - LPMM18/4532  Respondent: Kirsten Collins 15398593  Agent:

MM41: I object to the huge increase in planned new homes (now 550 rather than the original 400 about I and many others objected to previously). I am especially concerned about the impact of this on local schools. Children in Send already face a real difficulty in obtaining a secondary place within sensible reach of their home. The fit will make the already busy Send road even busier.

Attached documents:

Comment: MM44 - LPMM18/4533  Respondent: Kirsten Collins 15398593  Agent:

MM44: I object because this site was originally deleted from the plan- it involves yet more houses. The local residents have given GBC a clear message that we are highly concerned about the impact on the local community. I have seen no evidence of thought about how local infrastructure will develop to solve the problems the more housing will introduce.

Attached documents:

Comment: MM3 - LPMM18/1614  Respondent: Jean Bridger 15406433  Agent:

MM3 Policy 53.Guildford must have an effective local Plan - development rules must ensure development quality across the town centre.

Attached documents:

Comment: MM41 - LPMM18/2337  Respondent: Guy Whatley 15406593  Agent:

Objection to MM41 Land at Garlick's Arch A43

I previously object to Garlick's Arch and its proposal to build the 400 homes and industrial space. I object to the development which will destroy ancient woodland, and it still does not seem to be supported by any evidence of need. It will join Ripley and Send together so both villages lose their character. The modified plan now mentions 550 homes - a further increase in a development already unpopular due to thousands of previous objections.

The council often mentions 'affordable housing' in planned developments, but I am single and in my early thirties and in low-paid employment. I am unable to afford any type of housing in this area, and this plan to offer a small amount 'affordable housing' does not mean anything to people like myself.

Attached documents:

Comment: MM42 - LPMM18/2338  Respondent: Guy Whatley 15406593  Agent:
Objection to MM42 Land at Burnt Common A58

I object to the prospect of massive industrial space in Send which will mean vastly increased traffic on my daily commute to Cobham and in general. Traffic is very bad in the village and on many surrounding roads at most times of the day. Pollution from traffic fumes has been known to affect the health of the vulnerable, but there are no plans in place to add better roads or transport, so all coming and going would be on the already busy roads. With no other options, even the smallest of incidents already causes traffic chaos in Send.

Seeing as there is already some industrial development going on in Send, and empty industrial space here and throughout the Borough, where is the requirement for such a large industrial development? This seems to be a much larger and disproportionate development for such a small village where there is already some industrial development taking place.

Attached documents:

Comment: MM44 - LPMM18/2339  Respondent: Guy Whatley 15406593  Agent:

Objection to MM44 Land at Alderton's Farm A63

I object to the destruction of all and any planned development on the Green Belt surrounding Send village or in the Borough as a whole. I think Guildford has a responsibility to keep green spaces for generations to come. This sort of development opens the flood gates for all Green Belt Land to be developed and will ruin our countryside Borough.

Attached documents:

Comment: MM13 - LPMM18/5541  Respondent: Tabitha Scotland 15408225  Agent:

• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

Comment: MM2 - LPMM18/5538  Respondent: Tabitha Scotland 15408225  Agent:

I have not been advised of this consultation (despite being advised previously by email) and only heard of it by my neighbours. Why have you stopped informing me?

I fully support the representation made by Wisley Action Group and their legal team. In particular, their observations that:

• MM2 The housing target is wrong.

• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/5544  Respondent: Tabitha Scotland 15408225  Agent:

• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – (this makes it easier for developers)

• Strategic sites are to be exempt from design constraints (which will result in developments such as that proposed on Three Farm Meadows)

• There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/5545  Respondent: Tabitha Scotland 15408225  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/5547  Respondent: Tabitha Scotland 15408225  Agent:

SITE SPECIFIC – A35 – Three Farms Meadows
• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR
• Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
• MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
• The biodiversity of the SNCI will be destroyed by the proposed development.
• An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Attached documents:

Comment: MM41 - LPMM18/5542  Respondent: Tabitha Scotland 15408225  Agent:
• MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].

• There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

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**Comment:** MM9 - LPMM18/5539  **Respondent:** Tabitha Scotland  15408225  **Agent:**

• MM9 – infilling in and around villages will result in the weakening of protection of the countryside

**Attached documents:**

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**Comment:** MM13 - LPMM18/5531  **Respondent:** Pippa Scotland  15408353  **Agent:**

• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

**Attached documents:**

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**Comment:** MM2 - LPMM18/5529  **Respondent:** Pippa Scotland  15408353  **Agent:**

I have not been advised of this consultation (despite being advised previously by email) and only heard of it by my neighbours. Why have you stopped informing me?

I fully support the representation made by Wisley Action Group and their legal team. In particular, their observations that:

• MM2 The housing target is wrong.

• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.

• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

**Attached documents:**
Comment: MM23 - LPMM18/5533  Respondent: Pippa Scotland 15408353  Agent:

• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – (this makes it easier for developers)
• Strategic sites are to be exempt from design constraints (which will result in developments such as that proposed on Three Farm Meadows)
• There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/5535  Respondent: Pippa Scotland 15408353  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/5536  Respondent: Pippa Scotland 15408353  Agent:

SITE SPECIFIC – A35 – Three Farms Meadows
• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR
• Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
• MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
• The biodiversity of the SNCI will be destroyed by the proposed development.
• An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Attached documents:

Comment: MM41 - LPMM18/5532  Respondent: Pippa Scotland 15408353  Agent:

• MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].
• There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM9 - LPMM18/5530  Respondent: Pippa Scotland 15408353  Agent:
• MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

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Comment: MM13 - LPMM18/5522  Respondent: Nikki Kerr-Moller 15408417  Agent:

• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

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Comment: MM2 - LPMM18/5520  Respondent: Nikki Kerr-Moller 15408417  Agent:

I have not been advised of this consultation (despite being advised previously by email) and only heard of it by my neighbours. Why have you stopped informing me?

I fully support the representation made by Wisley Action Group and their legal team. In particular, their observations that:

• MM2 The housing target is wrong.

• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.

• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

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Comment: MM23 - LPMM18/5524  Respondent: Nikki Kerr-Moller 15408417  Agent:

• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – (this makes it easier for developers)

• Strategic sites are to be exempt from design constraints (which will result in developments such as that proposed on Three Farm Meadows)

• There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:
**Comment: MM3 - LPMM18/5525  Respondent: Nikki Kerr-Moller 15408417  Agent:**

- S3 The town centre policy is inadequate and does not address the infrastructure deficit.

**Attached documents:**

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**Comment: MM40 - LPMM18/5527  Respondent: Nikki Kerr-Moller 15408417  Agent:**

**SITE SPECIFIC – A35 – Three Farms Meadows**
- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
- MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

**Attached documents:**

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**Comment: MM41 - LPMM18/5523  Respondent: Nikki Kerr-Moller 15408417  Agent:**

MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].
- There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

---

**Comment: MM9 - LPMM18/5521  Respondent: Nikki Kerr-Moller 15408417  Agent:**

- MM9 – infilling in and around villages will result in the weakening of protection of the countryside

**Attached documents:**

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**Comment: MM2 - LPMM18/5293  Respondent: Robert Burton 15411553  Agent:**

I object - on the following grounds:
The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield.

I have not been advised of the consultation.

The examination in public should be reopened so that the latest Office of National Statistics can be used.

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5294</th>
<th>Respondent: Linda Burton 15411649</th>
<th>Agent:</th>
</tr>
</thead>
</table>

I object - on the following grounds:

Infilling in and around villages will result in the weakening of protection of the countryside.

This is Green belt land.

I have not been advised of the consultation.

The examination in public should be reopened so that the latest Office of National Statistics can be used.

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5280</th>
<th>Respondent: Thomas Brewer 15420577</th>
<th>Agent:</th>
</tr>
</thead>
</table>

I object - on the following grounds:

Infilling in and around villages will result in the weakening of protection of the countryside.

This is Green belt land.

I have not been advised of the consultation.

The examination in public should be reopened so that the latest Office of National Statistics can be used.

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5278</th>
<th>Respondent: Katie Brewer 15420609</th>
<th>Agent:</th>
</tr>
</thead>
</table>
I object - on the following grounds:

The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt.

I have not been advised of the consultation.

The examination in public should be reopened so that the latest Office of National Statistics can be used.

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC.

Attached documents:

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Comment: MM2 - LPMM18/5298  Respondent: A Patel 15420641  Agent:

I object - on the following grounds:

The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt.

I have not been advised of the consultation.

The examination in public should be reopened so that the latest Office of National Statistics can be used.

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC.

Attached documents:

---

Comment: MM2 - LPMM18/4778  Respondent: Kevin Freeland 15420673  Agent:

I object to the following:

Traffic on the adjacent roads are already gridlocked.

Schools and medical facilities are at breaking point.

With regards to Send Business Centre Tannery Lane is so narrow with no footpaths.

You're using all the Greenbelt land.

Attached documents:

---

Comment: MM2 - LPMM18/5964  Respondent: Jennifer Slade 15429985  Agent:
Objection to Main Modifications version of GBC Draft Local Plan 2018

Thousands of objections to the 2016 and 2017 Local Plans have been totally ignored during 3 previous consultations and at the recent Public Examination. The September 2018 data from the Government's Office for National Statistics suggests that the appropriate growth in Guildford Borough can be achieved with 460 houses per annum. This figure is supported by a respected consultancy, Barton Wilson, who consider 431 houses per annum would meet Guildford Borough's needs. Instead, the Inspector has used a Housing Need figure for Guildford of 789 houses p.a. Why?

Since the Inspector's Report relies on information with a significant overstatement of housing needs in the Borough it must be discounted and a revised plan to meet much reduced Housing Needs produced, which should include regeneration of the town centre and use of brownfield sites before allowing building on green belt. There are significant grounds to draw this error to the attention of the Secretary of State to force a revised Plan.

It would appear that GBC is failing to take into account the inadequate infrastructure of the Send and Ripley area for a disproportionately large industrial and residential development and consequently failing to put in place planning constraints, as is required by Law. GBC has not even undertaken a formal traffic impact study relating to the proposed new A3 slip roads and the Guildford Plan on the A247 and surrounding road networks.

Attached documents:

Comment: MM27 - LPM18/5971  Respondent: Jennifer Slade 15429985  Agent:

Transport Strategy: MM27 / MM41 / MM42 and MM48. GBC has not published any assessment of the increased traffic density which will be caused by the proposed addition of 770 dwellings to Send, which is an increase of 45%; the significantly expanded industrial and storage area and the new slip roads to and from the A3, which will result in thousands of extra cars and lorries traveling daily along the A247, together with the serious congestion and air pollution (which is already at dangerous levels). Any proper assessment would show that the proposed plan will result in the destruction of Ripley and Send's current infrastructure and that of its surrounding areas as well as increased noise and nitrogen dioxide pollution, causing damage to the health of residents and particularly children at the School on the A247 in Send, as well as serious traffic delays and gridlock of the local road network.

Attached documents:

Comment: MM41 - LPM18/5965  Respondent: Jennifer Slade 15429985  Agent:

Objection to MM41 - Land at Garlick's Arch, Send Marsh Policy A43. Despite 7000 previous objections, it is now proposed that the number of homes be increased by 37% from 400 to 550, of which 450 should be built in the first 5 years. Given the level of construction planned over the next 5 years within a 20 mile radius: Heathrow, M25 Junction 10 and the Petrol Pipeline to name but a few, it is naive and unrealistic to believe that there will even be available workforce to achieve this.

Based on the Government's ONS calculations this development would represent an excessive burden on Send/Ripley, as the figure demanded for this site alone would represent nearly 20% of GBC's total annual housing needs every year for the next 5 years.

This area, which is permanent Green Belt with no "exceptional circumstances" contains ancient woodland dating back to Elizabeth I which GBC are proposing to destroy. It is also currently a Flood Zone 2 allocation having frequent flooding and contains land contaminated with lead shot, following 50 years of shooting activity. The proposed development will
generate excessive traffic in Send and Ripley, on roads that are already gridlocked at peak times. This over-development would join Ripley to Burnt Common to Send, which is contrary to the key purpose of the Green Belt.

Schools, Nurseries, Doctors, Dentists and Hospitals, which are already under extreme pressure, would be unable to cope with such a concentrated increase in population. Without major infrastructure improvement and development - which the Plan does not even mention or consider - these facilities are likely to collapse.

Attached documents:

Comment: MM41 - LPMM18/5972  Respondent: Jennifer Slade 15429985  Agent:

**Transport Strategy: MM27 / MM41 / MM42 and MM48.**  GBC has not published any assessment of the increased traffic density which will be caused by the proposed addition of 770 dwellings to Send, which is an increase of 45%; the significantly expanded industrial and storage area and the new slip roads to and from the A3, which will result in thousands of extra cars and lorries traveling daily along the A247, together with the serious congestion and air pollution (which is already at dangerous levels). Any proper assessment would show that the proposed plan will result in the destruction of Ripley and Send's current infrastructure and that of its surrounding areas as well as increased noise and nitrogen dioxide pollution, causing damage to the health of residents and particularly children at the School on the A247 in Send, as well as serious traffic delays and gridlock of the local road network.

Attached documents:

Comment: MM42 - LPMM18/5966  Respondent: Jennifer Slade 15429985  Agent:

I object to MM42 - Land at Burnt Common, London Road, Send Policy A58. This was deleted from the 2014 draft plan due to the number of objections showing that there was no proven demand now or in the future for additional industrial capacity in this area. The draft plans stated a **MAXIMUM of 7000** square meters of Industrial and Storage but now proposes a **MINIMUM of 14,800** square meters. Does GBC presume that building a new A3 junction at Send justifies an industrial development of this increased size within a Green Belt residential / rural area when the industrial site at Slyfield still has empty units? The 2017 Employment Land Need Assessment showed a reduction in demand to 3.9 hectares for the whole of Guildford Borough - not the excessive allocation of 10 hectares within the Green Belt at Send alone. This would be by far the largest new industrial allocation in any village in the Borough. A new industrial site in the Ripley / Send area would cause an increase in commercial vehicle traffic through these villages to the A3, M25, M3 and M4 - contradicting MM9 and defeating the purpose of the Green Belt - on a road network which was never designed for Commercial traffic.

Attached documents:

Comment: MM44 - LPMM18/5967  Respondent: Jennifer Slade 15429985  Agent:

I object to M44 Land at Alderton's Farm, Send Marsh Road Policy A63. This was deleted from an earlier draft due to the number of objections and then re-inserted at the public examination in July 2018. It is Green Belt with no "special circumstances" so it also contradicts policy MM9. Any development in this area, let alone 120 new houses, will conflict with the heritage buildings at Send Marsh Green. Increased traffic will exacerbate the traffic problem at the Send Crossroads with the Send Road/Send Barns Lane which carries the traffic from Woking to the A3 and M25.
GBC has not published any assessment of the increased traffic density which will be caused by the proposed addition of 770 dwellings to Send, which is an increase of 45%; the significantly expanded industrial and storage area and the new slip roads to and from the A3, which will result in thousands of extra cars and lorries traveling daily along the A247, together with the serious congestion and air pollution (which is already at dangerous levels). Any proper assessment would show that the proposed plan will result in the destruction of Ripley and Send's current infrastructure and that of its surrounding areas as well as increased noise and nitrogen dioxide pollution, causing damage to the health of residents and particularly children at the School on the A247 in Send, as well as serious traffic delays and gridlock of the local road network.

I object to MM9 Green Belt Policy. GBC want an exception for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered within the village". This is totally subjective and leaves the door wide open for development of the Green Belt in the future. It provides no test at all as there are no definitions of how this could be "demonstrated". Speculators and Developers would be able to claim that any space at the edge of the village could be developed, regardless of the environment or impact on local amenities.

Regarding MM27, MM41, MM42 and MM48 Transport Strategy

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

I am writing to forcefully object, in the strongest possible terms, to the modifications resulting from the Planning Inspector’s Report impacting the village of Send. The danger is that, if the proposals / modifications go ahead, Send will be transformed in a such a way that its village identity will be permanently destroyed. Linked to this, there will be significantly increased congestion, pollution and resulting damage to the environment. This will impact residents both in Guildford Borough and beyond.
The attitude by Guildford Borough Council is almost unbelievable after the objections they received following the last Report. There has obviously been a decision made to ‘dump’ everything onto Send, thus destroying Send as a village, in order to protect the town of Guildford. This attitude is completely unacceptable. Not only will it result in a reduction in the residents of Sends’ standard of living, but will also effect the values of our properties. Are Guildford Borough Council willing to compensate us for any loss of value or saleability to our homes? I suspect not!

Specifically, I object to Main Modification 41 (Land at Garlick’s Arch, Send Marsh, Policy A43) because:

• An increase of 37% in the number of houses will destroy the village identity
• It ignores 7,000 objections already lodged
• It is Green Belt containing ancient woodland
• It will join up two separate villages (Send and Ripley) without sufficient school places with the recent closure of Ripley Primary school and no extra capacity at Send Primary school
• The site is subject to frequent flooding (a flood zone 2 area) and contamination by lead shot
• The extra cars will block up the adjacent roads and increase air pollution of carbon monoxide, nitrogen monoxide and nitrogen dioxide
• Medical facilities will be unable to cope with the increased demand

Attached documents:

Comment: MM41 - LPMM18/2743  Respondent: Helen Green 15433153  Agent:

Regarding MM27, MM41, MM42 and MM48 Transport Strategy

• There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

Attached documents:

Comment: MM42 - LPMM18/2739  Respondent: Helen Green 15433153  Agent:

I object to MM42 (Land at Burnt Common, London Road, Send A58) because:

• It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan
• With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East.
• The concentration in Send is more severe than any other part of the Guildford Borough. This seems unfair
• The industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not the proposed huge allocation of over 10 hectares at Send – and in the Green Belt
• Once again, the impact on congestion will be significant as will Nitrogen dioxide levels causing potential damage to health

Attached documents:
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<tr>
<th>Comment</th>
<th>MM42 - LPMM18/2744</th>
<th>Respondent: Helen Green 15433153</th>
<th>Agent:</th>
<th><strong>Regarding MM27, MM41, MM42 and MM48 Transport Strategy</strong></th>
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<th>Respondent: Helen Green 15433153</th>
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<th><strong>I object to MM44 (Land at Alderton’s Farm, Send Marsh Road Policy A 63):</strong></th>
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<td>• The additional traffic will increase pressure on Send Crossroads. Living at these cross roads, I can testify to the fact that it is very difficult to get out of our drive at rush hour as traffic is tailed back to the A3. Once again, air pollution affects our garden and environs</td>
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<th><strong>I am concerned about MM9 Green Belt policy</strong></th>
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<td>• This introduces a very subjective test and actually negates Green Belt policy. Speculators may be able to ‘pick off’ land at the edge of the village</td>
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1641 of 2554
• The travellers’ site on Send Hill will exacerbate all the problems mentioned above and make the overall impact on Send significantly detrimental to all those living in this part of the Guildford Borough.

• [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

I would be most grateful if you could take into consideration all my views listed above. Many thanks.

Attached documents:

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Comment: MM41 - LPMM18/2049  Respondent: Mrs Kay Webb 15433473  Agent:

I object to the increase in housing from 400 to 550. This land is Green Belt and ancient woodland and therefore should not be built on. The development of this land will mean that there is no longer a natural village boundary and separation between Send and Ripley. Our schools and medical centre will not be able to cope with the huge increase in population, and the increase in traffic by over 800 cars on our already congested roads from just this one site, let alone all the other sites proposed for Send and surrounding areas, will be horrendous and cause traffic gridlock. An increase of between 1600 and 1700 extra people will completely overwhelm all the local amenities and facilities including sewage and water etc. The schools and medical centre are already full to capacity

Attached documents:

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Comment: MM42 - LPMM18/2056  Respondent: Mrs Kay Webb 15433473  Agent:

I object to the increase in the minimum floor space at Burntcommon Warehouse. There is no justified need for more industrial sites in the Green Belt, and with an additional increase at Send Business Centre this will mean Send has more industrial space than any other village - with the possibility of even more industrial development on this site in the future as there is no precise allocation limit. The nearby site of Slyfield has unused capacity which should be utilised instead.

If these sites go ahead, Send will be overdeveloped and will lose its Village identity.

I am also concerned about the level of commercial traffic that will be moving to and from this proposed site, as the main road to Woking through Send is already congested. Nitrogen dioxide levels in our area are dangerous already without the addition of all the extra vehicles from all the proposed sites. Surely it is not acceptable to allow this proposed site, which will inflict more pollution and congestion misery on us, when there is no proven demand for this sort of development

Attached documents:

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Comment: MM44 - LPMM18/2059  Respondent: Mrs Kay Webb 15433473  Agent:

I object to this addition of 120 houses to the plan because:
The increase in traffic will create gridlock on our roads

This site is a Green Belt site with no special circumstances

Existing local services such as the medical centre and schools will not be able to cope with all the additional people. This site and the others proposed for Send/Send Marsh amounts to 770 new homes being added to the current 1700 resulting in an increase of 45% - this is too much for our infrastructure to cope with. Consultancy firm, Barton Willmore, have said that the correct figure for Guildfords housing need should be 431 per year, and the September data from the Office of National Statistics suggests that appropriate growth in Guildford Borough may be achieved with 460 houses a year - this is vastly different to the 789 per year figure being used by the Inspector at the Public Examination and therefore the proposals for Send should be reduced to reflect this

I understand the need for more housing and agree there should be some development, but surely it is better to spread the housing need fairly throughout the borough with smaller developments rather than ruin our village by creating traffic chaos and misery, pollution and destruction of the green spaces in and around Send. The current proposals for Send and Send Marsh are inappropriate, highly damaging for the community and the area, and an unnecessary erosion of the Green Belt.

Attached documents:

Comment: MM45 - LPMM18/5305  Respondent: June Newell 15434177  Agent:

My comments are that the infrastructure would be unable to cope with a large number of additional houses as proposed. Further the green belt will be damaged if these houses are built in an area that is very rural by its nature and would lead to a large number of additional car movements on roads that are unable to cope.

I hope you will consider my comments.

Attached documents:

Comment: MM2 - LPMM18/2370  Respondent: David A Sprigings 15438049  Agent:

Objections to the Guildford Borough Council Proposed Submission Local Plan (September 2018)

The Guildford Borough Submission Local Plan strategy and sites main modifications September 2018 Policies pdf says on page 18 under Spatial Vision " The plan provides for the delivery of at least 12426 additional homes by 2034".

This is the same as the total in the 2017 plan under point 1 of Policy S2.

This therefore shows NO increase in the total of additional homes from 2017 to 2018.

In the 2018 plan page 25 includes "During the plan period (2015-2034) provision has been made for at least 12600 new homes".

It would help if residents could rely on the plan being correct and consistent throughout.

Even at 12600 the increase from 2017 to 2018 is only 174 or 1.4% for the total borough.
In the 2018 plan Send has been hit with an extra 150 homes at Garlick's Arch A43 under MM41 and 120 homes by the addition of Alderton's Farm A63 under MM44, so a total increase of 270 which is more than the total increase for the borough.

It is totally wrong to focus so much extra on one small village which brings the total additional homes in Send to 770 which is an increase of over 45%. As well as being totally inappropriate to the scale of the locality it would have an adverse impact on the character of the countryside and the local environment; all of which is contrary to Green Belt limited infilling policy P2 under clause 4.3.26 on page 54.

It is totally inappropriate to hit Send with such a large increase when there is a net decrease (assuming the total of 12600 is correct) in the rest of the borough.

I therefore totally object to the very excessive focus on new developments in Send.

I also object to the plan as a whole because of the unjustified focus of planned new homes in the Send/Send Marsh/Burntcommon/Ripley area and localities as 46% of the total for the borough is within 3 miles of Send Marsh.

This is totally unacceptable as it will overwhelm the local infrastructure for which no increase is planned, apart from several transport strategy projects which will end up making things worse by attracting far more traffic into this very busy area.

Attached documents:

Comment: MM27 - LPMM18/2375  Respondent: David A Sprigings 15438049  Agent:

MM27 MM40 MM41 MM42 MM48 Transport Strategy

The transport strategy in the Send/Send Marsh/Burntcommon/Ripley area does not look as though it will help deal with traffic congestion in the area but more likely to make it worse.

The timing is such that the developments in the area are front end loaded, mostly in the first 5 years of the plan, whilst major road improvements are mostly scheduled to not be completed until later years.

The road developments appear anyway to be designed to bring yet more traffic through these villages including to and from Woking which will increase pollution, delays and gridlock. To build many of the proposed new homes in advance of road improvements will only make matters worse.

The potential future all movements junction of the A3 with the A3100 London Road, the B2215 London Road and the A247 Clandon Road for the provision of land for a connector road to the B2215 London Road/A247 Clandon Road in MM35 Gosden Hill Farm under Transport Strategy (2) and Opportunities (6) sounds like a recipe for yet more traffic to be drawn through Burntcommon/Send Marsh/Send/Ripley making things even worse so although a plan for the future I object to it now.

Attached documents:

Comment: MM40 - LPMM18/2376  Respondent: David A Sprigings 15438049  Agent:

MM27 MM40 MM41 MM42 MM48 Transport Strategy
The transport strategy in the Send/Send Marsh/Burntcommon/Ripley area does not look as though it will help deal with traffic congestion in the area but more likely to make it worse.

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Attached documents:

Comment: MM41 - LPMM18/2371  Respondent: David A Sprigings 15438049  Agent:

My objections to certain specific modifications proposed are as follows:

MM41

1. I object to site allocation A43 Garlick's Arch as it is totally wrong to increase the number of planned homes by 150 or 37.5% which is completely excessive at 86% of the total plan increase of 174 from 12426 to 12600 for the whole borough.

2. I object to the increase of 150 homes at site allocation A43 Garlick's Arch as it is Green Belt including ancient woodland and is contrary to the Green Belt limited infilling policy being totally inappropriate to the scale of the locality and would have an adverse impact on the character of the countryside and the local environment. Ref. Policy P2 under clause 4.3.26 on page 54. There are no special circumstances to justify this.

3. I object to this increase of 150 homes on a site which is subject to flooding.

4. The increase from 400 to 550 homes will add considerably to the amount of cars in the area increasing traffic congestion and making existing parking problems in both Send and Ripley even worse.

5. I object to this increase of 150 homes as the extra cars will add further to the potential harm from pollution and accident risk to pupils at Send Primary School and parents and staff, and also patients and staff at the Medical Centre as well as residents and businesses.

6. I object to this increase of 150 homes as it will put even more pressure on local infrastructure including the school and Medical Centre

7. I object to the addition of 150 homes which will further increase the residential link between Send and Ripley, the over development involved moving the locality closer to ribbon development and further harming the countryside and local environment.

8. I object to the increase of 150 homes with the continued inclusion of 6 Travelling Showpeople plots which is contrary to the borough's policy of 6 such plots being only appropriate to development sites with 1500-1999 new homes.

Attached documents:
MM27 MM40 MM41 MM42 MM48 Transport Strategy

The transport strategy in the Send/Send Marsh/Burntcommon/Ripley area does not look as though it will help deal with traffic congestion in the area but more likely to make it worse.

The timing is such that the developments in the area are front end loaded, mostly in the first 5 years of the plan, whilst major road improvements are mostly scheduled to not be completed until later years.

The road developments appear anyway to be designed to bring yet more traffic through these villages including to and from Woking which will increase pollution, delays and gridlock. To build many of the proposed new homes in advance of road improvements will only make matters worse.

The potential future all movements junction of the A3 with the A3100 London Road, the B2215 London Road and the A247 Clandon Road for the provision of land for a connector road to the B2215 London Road/A247 Clandon Road in MM35 Gosden Hill Farm under Transport Strategy (2) and Opportunities (6) sounds like a recipe for yet more traffic to be drawn through Burntcommon/Send Marsh/Send/Ripley making things even worse so although a plan for the future I object to it now.

Attached documents:

Comment: MM42 - LPMM18/2372 Respondent: David A Sprigings 15438049 Agent:

MM42

9. I object to site allocation A58 Land around Burnt Common warehouse, London Road, Send as there is no justification for changing the required industrial/warehousing space (B1c, B2 & B8) from a minimum of 7000 sq mts in the 2017 plan to a minimum of 14800 sq mts at A58 Burnt Common in the 2018 plan when the TOTAL requirement for Industrial Land (B1c, B2 & B8) ha at A58 Burnt Common in the 2018 plan is unchanged from the range of 3.7 to 4.1 ha in the 2017 plan (Policy S2: Planning for the borough - our spatial development strategy, point (1) page 30 and Policy E1: Meeting employment needs, table under point (1) page 71). This is a reduction of some 20% from the Total requirement for such industrial land in the 2016 plan so it is totally unnecessary to more than double the proposer area at Burntcommon, especially when Slyfield is much more suitable.

10. This is a far bigger increase in industrial allocation than in any other village in the borough and is totally excessive.

11. Slyfield, which I believe has unused capacity, is much more suitable for this sort of industrial/warehousing space and should be used instead of Burntcommon.

12. It is wrong and unnecessary to put such an industrial site in a Green Belt area when Slyfield is a much better alternative.

13. Adding this industrial development to the proposed residential developments in the area will add even more to traffic congestion as well as pollution and accident risk.

Attached documents:
MM27 MM40 MM41 MM42 MM48 Transport Strategy

The transport strategy in the Send/Send Marsh/Burntcommon/Ripley area does not look as though it will help deal with traffic congestion in the area but more likely to make it worse.

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Attached documents:

Comment: MM44 - LPMM18/2373  Respondent: David A Sprigings 15438049  Agent:

MM44

14. I object to the addition of Alderton's Farm A63 to the plan with a further 120 homes which equates to 69% of the total increase in the borough from 12426 in 2017 to 12600 in 2018 and is totally excessive and unacceptable.

15. I object to the increase and inclusion of 120 homes at site allocation A63 Alderton's Farm as it is Green Belt and is contrary to the Green Belt limited infilling policy being totally inappropriate to the scale of the locality and would have an adverse impact on the character of the countryside and the local environment. Ref. Policy P2 under clause 4.3.26 on page 54. There are no special circumstances to justify this.

16. The increase and inclusion of 120 homes will add further to the number of cars in the area increasing traffic congestion and making existing parking problems in both Send and Ripley even worse.

17. I object to this increase and inclusion of 120 homes as the extra cars will add further to the potential harm from pollution and accident risk to pupils at Send Primary School and parents and staff, and also patients and staff at the Medical Centre as well as residents and businesses.

18. I object to this increase and inclusion of 120 homes as it will put even more pressure on local infrastructure including the school and Medical Centre

19. I object to the addition of 120 homes which will further increase the residential link between Send, Send Marsh, and Ripley, the over development involved moving the locality closer to ribbon development and further harming the countryside and local environment.

Attached documents:

Comment: MM48 - LPMM18/2379  Respondent: David A Sprigings 15438049  Agent:

MM44

14. I object to the addition of Alderton's Farm A63 to the plan with a further 120 homes which equates to 69% of the total increase in the borough from 12426 in 2017 to 12600 in 2018 and is totally excessive and unacceptable.

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The transport strategy in the Send/Send Marsh/Burntcommon/Ripley area does not look as though it will help deal with traffic congestion in the area but more likely to make it worse.

The timing is such that the developments in the area are front end loaded, mostly in the first 5 years of the plan, whilst major road improvements are mostly scheduled to not be completed until later years.

The road developments appear anyway to be designed to bring yet more traffic through these villages including to and from Woking which will increase pollution, delays and gridlock. To build many of the proposed new homes in advance of road improvements will only make matters worse.

The potential future all movements junction of the A3 with the A3100 London Road, the B2215 London Road and the A247 Clandon Road for the provision of land for a connector road to the B2215 London Road/A247 Clandon Road in MM35 Gosden Hill Farm under Transport Strategy (2) and Opportunities (6) sounds like a recipe for yet more traffic to be drawn through Burntcommon/Send Marsh/Send/Ripley making things even worse so although a plan for the future I object to it now.

Attached documents:

Comment: MM9 - LPMM18/2374  Respondent: David A Sprigings 15438049  Agent:

MM9

20. Although special circumstances are required to justify Green Belt developments there are none apparent in the proposed increases in MM41 and MM44

21. Local Plan Final Consultation Version 2018 Policies.pdf clause 4.3.26 on page 54 of Policy P2 Green Belt states:

For the purposes of this policy, limited infilling is considered to be the development of a small gap in an otherwise continuous build-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development. It should be appropriate to the scale of locality and not have an adverse impact on the character of the countryside or the local enviroment.

Neither MM41 nor MM44 comes close to complying with these policy requirements.

Attached documents:

Comment: MM41 - LPMM18/5264  Respondent: Linda Daniell 15440161  Agent:

I object to MM41. The increase in housing would put stress on the infrastructure of this area. The newly built school in Send is already not fit for purpose in the long term and could not support more pupils.

The medical facilities are currently over stretched and in particular, the A and E departments of our local hospitals would be unable to cope with more demand.

Additionally, our roads are already blocked and unable to manage more traffic.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/5265</th>
<th>Respondent: Linda Daniell 15440161</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM42</td>
<td>Increased capacity for this site is unreasonable and unnecessary. Slyfield has unused capacity. We already have an increase at Send Business Park.</td>
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<td>Attached documents:</td>
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<th>Comment: MM27 - LPMM18/2236</th>
<th>Respondent: C Knaggs 15443265</th>
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<tr>
<td>I protest most strongly.</td>
<td>Medical facilities, roads cannot cope, noise, dirt, dust, bus service cannot cope. Area being ruined.</td>
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<td>Comment: MM48 - LPMM18/2237</td>
<td>Respondent: C Knaggs 15443265</td>
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<th>Respondent: Peter Hoar 15446561</th>
<th>Agent:</th>
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<tr>
<td>I am writing to object to the ludicrous proposal to completely ruin Send and the surrounding areas with an enormous building programme.</td>
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<td>MM41.</td>
<td>Garlicks Arch is not only a Green Belt area but an ancient woodland. Its destruction would show the Council has absolutely no concern for the environment. It would cause enormous problems at the junction with Send Marsh Road already impossible at peak travel times.</td>
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<td>MM42</td>
<td>Will cause a huge increase in traffic to an area already gridlocked in the rush hour. Air pollution will be significantly increased. There is little demand and no special circumstances and so contradicts MM9.</td>
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<td>Attached documents:</td>
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Green Belt has already been violated and the Council expect further capitulation from nearby residents. Overall they are planning a 45% increase to houses in Send and expect us to consider this a reasonable request. I wonder how many of them live in Send.

Attached documents:

Comment: MM9 - LPMM18/117  Respondent: Peter Hoar 15446561  Agent:

MM9.

There are NO very special circumstances to justify the decimation of the Green Belt in the Send area. To allow these proposals to proceed would lead to the elimination of the Green Belt in the UK.

Attached documents:

Comment: MM41 - LPMM18/93  Respondent: Mrs Eileen Barr 15446689  Agent:

I object to this massive development on Green Belt land containing ancient woodland. Adjacent roads cannot cope with the resulting additional traffic. Ripley Primary School has closed and Send School is already full. It is already difficult to get an appointment at the nearest medical centre. This development is not sustainable.

Attached documents:

Comment: MM42 - LPMM18/94  Respondent: Mrs Eileen Barr 15446689  Agent:

I object to these proposals as local roads become choked with traffic now. This land is in the Green Belt but if such development is needed there is capacity at Slyfield.

Attached documents:

Comment: MM44 - LPMM18/95  Respondent: Mrs Eileen Barr 15446689  Agent:

I object to yet more development on Green Belt land which will add even more traffic to adjacent roads which are already congested. The infrastructure cannot support so much development in a village location. Why is so much development being concentrated in such a small geographical area?

Attached documents:
Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.
The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt
The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/5496  Respondent: Edward Bates 15448385  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.
MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/5488  Respondent: Edward Bates 15448385  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5500  Respondent: Edward Bates 15448385  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5501  Respondent: Edward Bates 15448385  Agent:
MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5503 Respondent: Edward Bates 15448385 Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/5506 Respondent: Edward Bates 15448385 Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/5509 Respondent: Edward Bates 15448385 Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM42 - LPMM18/5513 Respondent: Edward Bates 15448385 Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM44 - LPMM18/5515 Respondent: Edward Bates 15448385 Agent:
MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

**Comment: MM4 - LPMM18/5489  Respondent: Edward Bates 15448385  Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

**Comment: MM9 - LPMM18/5492  Respondent: Edward Bates 15448385  Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of **“green approaches”** should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

**Comment: MM41 - LPMM18/3471  Respondent: John Ridson 15448801  Agent:**

I wish to make the following objections:
MM41 Garlicks Arch: I object in the strongest possible terms to these proposals, as this woodland is an extremely valuable local landscape feature, forming the backdrop in local views and walks, including views from our house and garden. All summer we have watched a family of buzzards flying above the woodland. We objected to the previous proposal for this area, and now it's even worse with many more houses. Any development here will also lead to increased run off and potential flooding downstream - i.e. where we live. As well as being beautiful, we understand it is also Green Belt and contains some ancient woodland, and therefore completely unsuitable for development. And the development would also add to the local traffic congestion.

Attached documents:

Comment: MM44 - LPMM18/3472 Respondent: John Ridson 15448801 Agent:

MM44 Land at Alderton's Farm: I object to this as it will increase the traffic locally, which is already far too high; also because it is Green Belt, and because the development will detract from the buildings around Send Marsh Green.

Attached documents:

Comment: MM41 - LPMM18/4098 Respondent: Ruth Brothwell 15448897 Agent:

MM41

My previous objection related in particular to the loss of Green Belt land. I now notice that you have ignored this and increased the number of intended houses.

- I object most strongly to the removal of green belt in this area.
- Despite assurances there is no doubt that this build will hugely increase the number of cars trying to enter the area on to the Portsmouth Road and the Clandon Road. This will cause heavy congestion - too much for the villages.
- Our schools and doctor's surgeries are already full - 3 weeks to gain an appointment locally!! This extra burden without sufficient infrastructure additions is too much for the locality to bear.
- The proposed site is used currently for shooting and is therefore contaminated by the lead shot which results from this sport.
- I do not believe that an increase of 37% over the original and objected to element can be justified.
- Transport - the proposed A3 changes and Clandon Road changes do not provide adequate support for those that would be incurred through this development suggestion. No assessment has been advised to us as loyal council tax payers regarding it. Roads towards London and Woking are very heavy every day already. This situation can only add journey time, increased pollution and gridlock within the villages environments.

Attached documents:

Comment: MM42 - LPMM18/4102 Respondent: Ruth Brothwell 15448897 Agent:

MM42
My previous objection related in particular to the loss of Green Belt land. I now notice that you have ignored this and doubled the intended development size.

- I object most strongly to the removal of green belt in this area
- There are no special circumstances for this development so it contradicts MM9
- There is no proven demand stated for this increase given the current increase in the Send Business Centre that has already taken place.
- The increase in traffic from such a site - given that it is successfully leased and not left empty - will cause additional problems to roads which are already very congested locally.
- Transport strategy - the proposed A3 changes and Clandon Road changes do not provide adequate support for the changes that would be incurred through this development suggestion. No assessment has been advised to us as loyal council tax payers regarding it. Roads towards London and Woking are very heavy every day already as I know from commuting. This situation can only add journey time, increased pollution and gridlock within the villages environments.

Attached documents:

**Comment: MM44** - LPMM18/4106  **Respondent:** Ruth Brothwell 15448897  **Agent:**

MM44

My previous objection related in particular to the loss of Green Belt land. I now notice that you have ignored this and increased the sites intended for build

- I object most strongly to the removal of green belt in this area
- The additional traffic resulting from this development will seriously impact the village especially at Send Crossroads. This additional development is too much for our village and will seriously harm our infrastructure.

Attached documents:

**Comment: MM48** - LPMM18/4111  **Respondent:** Ruth Brothwell 15448897  **Agent:**

MM9

I object most strongly to the removal of green belt in this locality. Using 'limited infilling outside the identified settlement boundaries' as an excuse for this development shows very poor concern for loyal residents, is entirely subjective and produces uncertainty. Investment in property in this area was made believing certain areas were inviolate and this may well cause a change in the nature of the wealth of the entire area which would be a loss to GBC.

Attached documents:

**Comment: MM9** - LPMM18/4107  **Respondent:** Ruth Brothwell 15448897  **Agent:**

MM9
I object most strongly to the removal of green belt in this locality. Using 'limited infilling outside the identified settlement boundaries' as an excuse for this development shows very poor concern for loyal residents, is entirely subjective and produces uncertainty. Investment in property in this area was made believing certain areas were inviolate and this may well cause a change in the nature of the wealth of the entire area which would be a loss to GBC.

Attached documents:

Comment: MM27 - LPMM18/5477  Respondent: Margaret Ashmore 15449409  Agent:

Nobody has yet come up with plans for roads and other transport needs MM27, MM41, MM42, MM48. You as a Council know how important it is to get this done IF your plans are to go ahead. At present the current roads cannot take any extra traffic, all roads into and out of the Villages will be complete gridlock. Please think very carefully what you want to destroy, such as Green Belt, Village Life, and the History of this area.

Attached documents:

Comment: MM41 - LPMM18/5474  Respondent: Margaret Ashmore 15449409  Agent:

Good morning GBC Planning, I have read all your Modifications 2018 and i am very disappointed that you have not listened to any objections that the villages have put forward, in fact I would go as far as to say that [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

He has increased housing on Garlicks Arch which was already over planned (MM41). Burnt Common again an increase in Industrial units which is not needed, we have enough unites unoccupied, would `nt it be better to fill the empty units first,

but then of course you have also moved out at least three units at Burnt Common WHY?? was this in preparation for you to build.??

Attached documents:

Comment: MM41 - LPMM18/5478  Respondent: Margaret Ashmore 15449409  Agent:

Nobody has yet come up with plans for roads and other transport needs MM27, MM41, MM42, MM48. You as a Council know how important it is to get this done IF your plans are to go ahead. At present the current roads cannot take any extra traffic, all roads into and out of the Villages will be complete gridlock. Please think very carefully what you want to destroy, such as Green Belt, Village Life, and the History of this area.

Attached documents:

Comment: MM42 - LPMM18/5475  Respondent: Margaret Ashmore 15449409  Agent:
Aldertons farm Send Marsh Road why has this now been included well after the Inspectors report, this was very sneaky and under the radar, there is no reason for this to be on the plan. As with all your planning you are determined to destroy THE GREEN BELT which is so very important for nature, which I might add has not even been considered, why not?? According to your policy (MM9) you said you would unhold The Green Belt, so what is the idea of now building so many houses (which are NOT necessary) and industrial units which again are not needed.

Attached documents:

Comment: MM42 - LPMM18/5479  Respondent: Margaret Ashmore 15449409  Agent:

Nobody has yet come up with plans for roads and other transport needs MM27,MM41, MM42, MM48. You as a Council know how important it is to get this done IF your plans are to go ahead. At present the current roads cannot take any extra traffic, all roads into and out of the Villages will be complete gridlock. Please think very carefully what you want to destroy, such as Green Belt, Village Life, and the History of this area.

Attached documents:

Comment: MM48 - LPMM18/5480  Respondent: Margaret Ashmore 15449409  Agent:

Nobody has yet come up with plans for roads and other transport needs MM27,MM41, MM42, MM48. You as a Council know how important it is to get this done IF your plans are to go ahead. At present the current roads cannot take any extra traffic, all roads into and out of the Villages will be complete gridlock. Please think very carefully what you want to destroy, such as Green Belt, Village Life, and the History of this area.

Attached documents:

Comment: MM13 - LPMM18/4735  Respondent: Marion Marshall 15451841  Agent:

MM13.

The allocation of this amount of additional retail space is completely unrealistic in today's retail environment. The evidence base is widely out-of-date given the current trends and impact of on-line shopping. Rather than develop more retail, redevelop unsustainable town centre retail sites into affordable and sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/4733  Respondent: Marion Marshall 15451841  Agent:

RE: GUILDFORD BOROUGH COUNCIL- LOCAL PLAN CONSULTATION.
I write further to the publication of the revisions to the draft Local Plan. I object to the proposals for the following reasons:

MM2. I still consider that the Housing Target figure is wrong. The hearing on the Local Plan must be re-opened in order that the latest ONS figures and household projections can be taken into account.

MM2. Why should Guildford be required to take Woking's unmet need especially as by doing so further green belt land will be required?

Attached documents:

Comment: MM3 - LPMM18/4737  Respondent: Marion Marshall 15451841  Agent:

S3. The town centre policy is inadequate and does not address the infrastructure deficit nor the structural changes currently being witnessed across the country in terms of the use of town centres.

Attached documents:

Comment: MM40 - LPMM18/4739  Respondent: Marion Marshall 15451841  Agent:

Site A35.

The addition of land to the south of the site does not mitigate the housing density as much of this land is constrained by the VOR beacon.

I therefore demand that the examination of the Local Plan be re-opened so that current factual evidence can be considered to include ONS figures and that a revised retail demand forecast for Guildford Town Centre be commissioned, if not already available.

I also understand that GBC has been hiding behind a mis-interpretation of the GDPR regulations by only sending out 2,600 reminders and not 10,500 (last time) - no doubt in an attempt to reduce responses.

Please therefore take this latter as a formal objection to the proposals.

Attached documents:

Comment: MM41 - LPMM18/4736  Respondent: Marion Marshall 15451841  Agent:

MM41. Transport strategy relies too much on inadequate modelling, including the delay to the M25 JIO/RHS scheme. This will impact on proposal in the north of the borough, especially Three Farms Meadow.

Too much reliance is put on alterations to the A3 near Guildford, all of which are outside of GBC's control.

Attached documents:
MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The increase from 400 to 550 homes of which 450 to be built in the first five years

- It is Green Belt containing ancient woodland
- An increase of 37% in the number of houses proposed is excessive
- 7000 ejections to the previous lower number have been ignored
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

MM42 Land at Burnt Common, London Road, Send, Policy A58

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive
• Since being deleted from the 2014 plan this has been increased twice, doubling the area
• It is by far the largest new industrial allocation in any village in the borough
• There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
• The Employment Land Needs Assessment showed a reduction in demand for industrial land.
• This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerously high.

Attached documents:

Comment: MM42 - LPMM18/473  Respondent: Janet Tarbet 15454529  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/469  Respondent: Janet Tarbet 15454529  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

New site for 120 Homes including some self build

• This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July.
• It is a Green Belt site with no special circumstances so it also contradicts Policy MM9.
• It will detract from the heritage buildings at Send Marsh Green.
• The additional traffic will increase pressure on the Send Crossroads.
• With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40) it adds 770 houses to the 1,700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/474  Respondent: Janet Tarbet 15454529  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC
offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment:** MM9 - LPMM18/470  **Respondent:** Janet Tarbet 15454529  **Agent:**

**MM9 Green Belt Policy**

Although the ‘modifications’ claim to protect the Green Belt except in very special circumstances GBC make an exception for ‘limited infilling outside of the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents and the environment.

Attached documents:

**Comment:** Other comments - LPMM18/475  **Respondent:** Janet Tarbet 15454529  **Agent:**

**Other Developments**

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tamery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

**Comment:** MM45 - LPMM18/5261  **Respondent:** M Wicks 15456705  **Agent:**

**Normandy Planning Proposal**

**Main Modification 45 (MM45), dealing with Policy A64**

I am forwarding my OPPOSITION towards the above planning proposal.

I do not see any exceptional circumstances as to why this development needs to be on Greenbelt land. Has all consideration truly been given to the Brownfield sites in the borough? What is the justification for this particular site?

More than 105 new houses will create a 7% increase in the size of Normandy but so far I see no accompanying proposed measures for improvements in the local infrastructure. Whilst there is a medical centre/doctors surgery/churches/community centres in the village, other amenities such as local shops and public houses have slowly been depleted over the years. Any residents needing the use of the majority of services in life has to travel on the main road going through Normandy (Aldershot to Guildford). It is obvious that this road can already be congested and slow moving at peak times so with the addition of vehicles from another 105 dwellings, this will only exacerbate the current traffic problems further.
Comment: MM2 - LPMM18/1824  Respondent: Ian Symes 15457953  Agent:

Thank you for giving me the opportunity to contribute.

I am very concerned about two aspects.

Firstly the increased housing supply target and meeting Woking's unmet need. Both of these seem to be associated with the instructions of an unelected planning official. I am completely opposed to both increases.

This is supposed to be a democratic process and I have been giving GBC my responses for several years. We have never before been asked to comment on Woking's unmet need and to me this is an undemocratic tactic by an unelected planning official to get more building on the greenbelt in the borough. It should be opposed.

Secondly I would like to see Wisley removed from being inset and a development site selection. The recent appeal was dismissed and GBC were represented by a 'silk' in opposing the planning application. I would now like this backed up by removing Wisley from the Local Plan.

Thank you for a chance to comment.

Attached documents:

Comment: MM2 - LPMM18/3747  Respondent: K C Meldrum 15458081  Agent:

Response to the Main Modifications to the Submission Local Plan (2017) Guildford Local Plan: Examination in Public (EIP)

I have the following comments on the above consultation.

MM2 I continue to have concerns about the OAN and these concerns are reinforced by the recent work conducted by Neil MacDonald from NMSS which I have studied. Based on the new information from ONS and NMSS, I suggest that the Examination of the Local Plan should be re-opened by the Inspector to allow the latest ONS and NMSS data to be examined and discussed.

I have also have concerns about the proposal to increase our housing requirement by 42 households per year to meet Woking’s unmet need. Guildford has exactly the same Green Belt constraints as Woking. In addition I understand that based on the recent ONS figures the Woking unmet need is now itself overstated and this is a further argument for Guildford to avoid further Green Belt erosion.

I urge the Inspector to review this element of the Local Plan and eliminate the unmet need figure of 42 new households per year completely.

Attached documents:

Comment: MM23 - LPMM18/3750  Respondent: K C Meldrum 15458081  Agent:
**MM23**- I support and appreciate the importance of Master Planning. This is especially important for Gosden Hill Farm (Policy A25) to ensure that no development takes place until agreement is reached between the developer and GBC on the key infrastructure requirements for the whole site covering the road network, accessibility, transport, and provision of both water and sewage.

However, this policy makes no specific reference to infrastructure nor to the means by which the Master Plan will be approved. This deficiency should be rectified and the Local Plan should require that a Master Plan for Gosden Hill Farm be approved before any development takes place.

**Attached documents:**

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**Comment:** MM27 - LPMM18/3751  **Respondent:** K C Meldrum 15458081  **Agent:**

**MM27** – On 4.6.18a I still believe that the proposed two-way junction with the A3 in Policy A25 at Gosden Hill Farm should be a 4 way junction.

In addition I believe that the Sustainable Movement Corridor isn’t viable in view of the restricted nature of the roads between Burpham and the Town Centre along the A3100 and the whole concept should be reviewed and, if appropriate, amended.

**Attached documents:**

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**Comment:** MM3 - LPMM18/3748  **Respondent:** K C Meldrum 15458081  **Agent:**

**MM3** – It is appreciated that Policy S3 has been introduced at a late stage but I suggest that it should be converted into a Master Plan to be incorporated into the Local Plan and that in addition it should include an element of housing development.

**Attached documents:**

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**Comment:** MM35 - LPMM18/3752  **Respondent:** K C Meldrum 15458081  **Agent:**

**MM35** – I appreciate the drafting behind these modifications but the detail is less than clear. Transport Strategy (1) is clear but Transport Strategy (2) is less so and the paragraph suggests that there could be an all movements junction of the A3 with roads north of the A3, west of the site and also to the east of the site. The wording of this condition should be amended to make it an obligation to have a 4 way junction on the Gosden Hill site rather than a matter that will be considered at any Planning Application stage. This is necessary to prevent additional and unnecessary traffic congestion in Burpham and Merrow.

**Attached documents:**

---

**Comment:** MM5 - LPMM18/3749  **Respondent:** K C Meldrum 15458081  **Agent:**
MM5 – We note that at 4.2.23 it is stated there is no evidence for a need for a (travellers) transit site within our Borough. Since travellers from time to time use the Park and Ride facility in Merrow I suggest that a transit site is needed in Guildford and this should be included in the Local Plan.

Attached documents:

Comment: MM2 - LPMM18/5771  Respondent: Donna Collinson 15460737  Agent:

Guildford Borough Council is persisting in calling for a high housing figure.

The current figure in the Draft Plan, of 630+42 extra homes a year, is 75% higher than the number of homes needed to support ambitious economic growth and out of step with both the new ONS figures and the new Government formula. It is based on:

- adding extra homes for students even though they are already well catered for in the figures
- inflating the figures by being very pessimistic about how many and how much local people work, so lots of extra workers would have to be brought in.

We would be building two times more homes than the local population needs in the hope over-supply will drive down house prices.

GBC is saying it wants the extra homes to justify new infrastructure. This overlooks the fact developers only contribute to new infrastructure to the extent they make problems worse. Developers do not tackle the backlog of infrastructure investment or existing congestion. In any case, early development in our Plan currently offers little in the way of infrastructure.

To make matters worse, you are also suggesting we build an additional 42 homes a year in Guildford’s Green Belt to protect Woking’s Green Belt. This takes our proposed housing figure from 630 to 672. It seems perverse when Woking has ambitious growth plans and Guildford is more constrained Its housing need figure has also reduced and has not been assessed at Examination.

Relating to MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely mixed use including residential and student residential town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined,

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM3 - LPMM18/5772  Respondent: Donna Collinson 15460737  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM31 - LPMM18/5774  Respondent: Donna Collinson 15460737  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 Where is the allocation for an all-direction bus interchange?

Attached documents:

Comment: MM32 - LPMM18/5780  Respondent: Donna Collinson 15460737  Agent:

MM32 A height limit for White Lion Walk is required.
Comment: MM33 - LPMM18/5782  Respondent: Donna Collinson 15460737  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Comment: MM36 - LPMM18/5785  Respondent: Donna Collinson 15460737  Agent:

MM36 Should Blackwell Farm be retained as Green Belt, which also protects views from the AONB along the Hogs Back, and removed from the Plan? Revised housing need figures weaken the justification for development.

Comment: MM37 - LPMM18/5789  Respondent: Donna Collinson 15460737  Agent:

MM37 The proposed land for an access road between the A31 and Blackwell Farm would harm the AONB.

Comment: MM39 - LPMM18/5792  Respondent: Donna Collinson 15460737  Agent:

MM39 Can adding a new Green Belt site at Aaron’s Hill be justified given revised figures?

Comment: MM40 - LPMM18/5793  Respondent: Donna Collinson 15460737  Agent:

MM40 Should Wisley be retained as Green Belt and removed from the Plan? Revised housing need figures weaken the justification for development. It does not adjoin Guildford.
MM41 Should Garlick’s Arch be retained as Green Belt in view of revised housing need, rather than expanded?

Attached documents:

MM43 Can adding a new Green Belt site at Chilworth be justified in view of revised figures?

Attached documents:

MM44 Can adding a new Green Belt site at Send be justified in view of revised figures?

Attached documents:

MM45 Can adding a new Green Belt site at Flexford be justified in view of revised figures?

Attached documents:

Dear Inspector,

I am very surprised to see site A64 has been included as a main modification in the new local plan and appeal to you to reject it based on the following reasons:

- This site was protected by the greenbelt in the local plan last year. I ask what are exceptional circumstances for moving the boundary and including it this time?
- Previous applications have been rejected due to the greenbelt status, therefore it appears contradictory to include it now. It suggests the reason is no more than a panic response to the lack of provision for housing throughout the borough in previous years without consideration to impact.
- The site is of great landscape value, which can been viewed from the Hogs Back, the Surrey Hills Area of Outstanding Natural Beauty. A development of 105 houses will be visible from the this area and will spoil the view. Surely the intention of the AONB awarded to the Surrey Hills is to conserve the natural beauty of that environment?
• The Special Protection Area at Ash and Pirbright Ranges also lies within the 5km of the site. As per European and national legislation new developments may harm rare bird and wildlife populations. Many of which have been sighted and recorded within this boundary.
• Development of site A64 would place long term strain on the village. There is nothing in plan for infrastructure improvements to cope with a 7% increase to the village
• It will place a strain on existing services within the village. The school would be under immense pressure to cope with the extra capacity a development of this size would generate, as would the Doctors surgery. Local people as well as health care professionals, teachers and doctors are all very aware of the demands on our village practice and school at the moment. It appears the plan prefers to ignore these issues and promote additional housing irrespective of the quality of life.
• I am also very concerned about the extra traffic an additional 105 houses will generate. Unfortunately, Glaziers Lane is a D classified road and not suitable for the significant rise in road users it would produce. Almost 100% of driveways and front gardens face directly onto Glaziers Lane, the very nature of this presents safety issues already on a road used as a cut-through during rush hour, let alone adding further demand to this rural lane.
• The volume of traffic through Normandy on the A323 Aldershot to Guildford Road, has increased significantly due the development of thousands of homes in Rushmoor borough council. These developments are on-going and haven't been completed yet. Normandy and Flexford will continue to feel the impact of this as drivers choose local roads to/from Aldershot to Guildford, to avoid the heavily congested A31 during rush hour

Given my views above it appears the inclusion of site A64 serves no benefit to the village only 'developer gain' and I would appreciate your full consideration in rejecting it from the local plan. Thank you.

Regards

Melanie Williams

Attached documents:

Comment: MM2 - LPMM18/5708 Respondent: Paul Smith 15461793 Agent:

I support GRA & GVG findings that the Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited

2. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination

3. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Attached documents:

Comment: MM3 - LPMM18/5710 Respondent: Paul Smith 15461793 Agent:

1. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

Attached documents:
Comment: MM41 - LPMM18/5709  Respondent: Paul Smith 15461793  Agent:

There is too much reliance on A3 improvements and they are beyond the council’s control

Attached documents:

Comment: MM2 - LPMM18/5284  Respondent: Jessie Macdonald 15463841  Agent:

I object - on the following grounds:

There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release

I have not been advised of the consultation

The examination in public should be reopened so that the latest Office of National Statistics can be used

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM2 - LPMM18/5282  Respondent: Ellen Macdonald 15463873  Agent:

I object - on the following grounds:

Infilling in and around villages will result in the weakening of protection of the countryside

This is Green belt land.

I have not been advised of the consultation

The examination in public should be reopened so that the latest Office of National Statistics can be used

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM2 - LPMM18/5286  Respondent: Joanne Macdonald 15463937  Agent:

I object - on the following grounds:

The sever impact on Strategic Highways network.
I have not been advised of the consultation
The examination in public should be reopened so that the latest Office of National Statistics can be used
I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM2 - LPMM18/5289  Respondent: Keiron Mills 15464001  Agent:

I object - on the following grounds:
Infilling in and around villages will result in the weakening of protection of the countryside
I have not been advised of the consultation
The examination in public should be reopened so that the latest Office of National Statistics can be used
I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM13 - LPMM18/4726  Respondent: Toby Marshall 15464161  Agent:

MM13.
The allocation of this amount of additional retail space is completely unrealistic in today's retail environment. The evidence base is widely out-of-date given the current trends and impact of on-line shopping. Rather than develop more retail, redevelop unsustainable town centre retail sites into affordable and sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/4725  Respondent: Toby Marshall 15464161  Agent:

RE: GUILDFORD BOROUGH COUNCIL- LOCAL PLAN CONSULTATION.
I write further to the publication of the revisions to the draft Local Plan. I object to the proposal for the following reasons:

MM2. I still consider that the Housing Target figure is wrong. The hearing on the Local Plan must be re-opened in order that the latest ONS figures and household projections can be taken into account.

MM2. Why should Guildford be required to take Woking's unmet need especially as by doing so further green belt land will be required?
Comment: MM3 - LPMM18/4728  Respondent: Toby Marshall 15464161  Agent: 

S3. The town centre policy is inadequate and does not address the infrastructure deficit nor the structural changes currently being witnessed across the country in terms of the use of town centres.

Comment: MM40 - LPMM18/4729  Respondent: Toby Marshall 15464161  Agent: 

Site A35.
The addition of land to the south of the site does not mitigate the housing density as much of this land is constrained by the VOR beacon. I therefore demand that the examination of the Local Plan be re-opened so that current factual evidence can be considered to include ONS figures and that a revised retail demand forecast for Guildford Town Centre be commissioned, if not already available.

I also understand that GBC has been hiding behind a mis-interpretation of the GDPR regulations by only sending out 2,600 reminders and not 10,500 (last time) - no doubt in an attempt to reduce responses.

Please therefore take this latter as a formal objection to the proposals.

Comment: MM41 - LPMM18/4727  Respondent: Toby Marshall 15464161  Agent: 

MM41.
Transport strategy relies too much on inadequate modelling, including the delay to the M25 J10/RHS scheme. This will impact on proposal in the north of the borough, especially Three Farms Meadow.

Too much reliance is put on alterations to the A3 near Guildford, all of which are outside of GBC's control.

Comment: MM2 - LPMM18/5290  Respondent: Matthew Mills 15464193  Agent: 

I object - on the following grounds:

This is green belt land and the secretary of state has already rejected this.
The housing target is wrong.
I have not been advised of the consultation
The examination in public should be reopened so that the latest Office of National Statistics can be used
I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:
I strongly object to the latest Guildford local plan for Send, which if approved will destroy our village, quality of life and cause much stress to local residents.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/4139</th>
<th>Respondent: Pauline East 15468705</th>
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The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons plus of course Gosden Hill and Wisley/Ockham are major and not adequately addressed with the proposed A3 changes etc.

It will I feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.

**Attached documents:**

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</table>

Increased from 400 to 550 homes.

I'm dismayed to find that despite over 7000 objections previously to this development this was ignored and the number of houses has been increased to 550. This is over development in what is Green Belt and will undoubtedly result in major increases in traffic on the surrounding roads and cause an overburden on our schools and medical facilities which are already under strain.

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The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons plus of course Gosden Hill and Wisley/Ockham are major and not adequately addressed with the proposed A3 changes etc.

It will I feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.

Attached documents:

Comment: MM42 - LPMM18/4137  
Respondent: Pauline East  
Agent: 

MM42 Land at Burnt Common, London Road, Send, Policy A58.

Increased from 7000 to a minimum of 14800 sq.m of industrial and storage.

Why having been deleted from the 2014 plan has this been increased twice, doubling the area when there is unused capacity at the Slyfield site.

Where is the demand anyway for industrial land, there are no special circumstances for this so it also contradicts policy MM9.

We already have a 25% increase making a much bigger concentration in Send than any other village with no proven demand.

Again this would impact on the environment and traffic on our already busy roads.

Attached documents:

Comment: MM42 - LPMM18/4141  
Respondent: Pauline East  
Agent: 

MM27, MM41, MM42 & MM48 Transport Strategy.

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons plus of course Gosden Hill and Wisley/Ockham are major and not adequately addressed with the proposed A3 changes etc.

It will I feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.
Comment: MM44 - LPMM18/4138  Respondent: Pauline East 15468705  Agent:

MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63.

New site for 120 homes.

Although deleted from an earlier draft because of objections it is has been reinstated! It is a Green Belt site with no special circumstances so it does contradict Green Belt Policy MM9.

Additional traffic will just add to the overall traffic problems that Send will have with these large developments.

When you combine this with Garlicks Arch it adds 770 homes to Send that is a 45% increase in houses and is far to much for our infrastructure, furthermore, Im told that according to Consultants and the Office for National Statistics appropriate growth in the Guildford Borough as a whole can be achieved with 460 houses per year.

Why are GBC not looking at Brownfield sites which I understand could meet the requirements.

Attached documents:

Comment: MM48 - LPMM18/4142  Respondent: Pauline East 15468705  Agent:

MM27, MM41, MM42 & MM48 Transport Strategy.

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons plus of course Gosden Hill and Wisley/Ockham are major and not adequately addressed with the proposed A3 changes etc.

It will I feel result in thousands more cars daily using Send Barns Lane and Send Road going to/from Woking etc past schools, medical centre and shops with major delays and gridlocks, noise and air pollution all to an intolerable and unacceptable level for our village.

Attached documents:

Comment: MM27 - LPMM18/4178  Respondent: Zoe Kollov 15468833  Agent:

I object to MM27, MM41, MM42 and MM48 Transport Strategy because;

- The traffic implications for Send as a result of proposed changes at Garlicks Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the
Clandon slip roads. GBC has performed no proper assessment of the resulting aggregate traffic and the way that this will build up to every working day causing pollution, delays gridlock and noise.

I object to the proposal to inset Send Business park from the green belt because:

- It will generate further traffic that will clog up the area to the detriment of all those currently living here
- It is an areas of outstanding beauty and is quite rightly protected as green belt that would be completely destroyed by this change
- there is no exceptional circumstance why the current green belt allocation should be changed for this purpose

I object to policy A42 change at Cockbarn in tannery lane because:

- I believe it should not take place in the first place, however a further increase in the number of homes is proposed which make the situation even worse
- The traffic in this area is getting worse and especially at the A247 junction
- Green belt land is protected in law and I see no reason that it should be built on.

Attached documents:

Comment: MM41 - LPMM18/4174  Respondent: Zoe Kollov 15468833  Agent:

I object to MM41 policy A43 change at Garlicks Arch because:

- I do not see any exceptional circumstances that should force the erosion of green belt land
- It will remove the 'green belt' between Ripley and Send that is necessary for the survival of our native species such as Hedgehogs
- It will generate further traffic that will clog up the area to the detriment of all those currently living here
- A further 550 homes will put further pressure on local services, which are currently at breaking point; transportation, hospitals, education etc.
- There is no proven requirement for travelling show people plots
- It will spoil the current beauty and openness of the area, which is what attracted my family and I in the first place.

Attached documents:

Comment: MM41 - LPMM18/4181  Respondent: Zoe Kollov 15468833  Agent:

I object to MM27, MM41, MM42 and MM48 Transport Strategy because;

- The traffic implications for Send as a result of proposed changes at Garlicks Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the
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- The traffic in this area is getting worse and especially at the A247 junction
- Green belt land is protected in law and I see no reason that it should be built on.

**Attached documents:**
I object to MM42, Policy A58 at Burnt common because;

- It was deleted from the 2014 draft because of all of the previous objections so I cannot understand why it has now been included again

- Industrial and warehousing could not be further from the idea of protected greenbelt land, Slyfield would be the obvious choice for such purposes as it already have the infrastructure and a grouping of similar businesses. This is not a good reason to irrevocably damage our Green Belt.

- I would like to leave my house in the future to my children and I want it to be surrounded by Green Belt land as it is now including all the nature that encompasses

- The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and since that point there has been a decline in the demand for such industrial land

- The 2017 Employment land Need assessment shows a reduction in demand to 3.9 hectares, rather than the massively inflated 10 hectares in send on the green belt

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

Attached documents:

object to MM44, Policy A63 Land at Alderton's farm, Send Marsh road because;

- With Garlicks Arch (550), Clockbarn (60), Wind ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%, this is far too much for the area to cope with as its infrastructure is already creaking, the roads jammed and the trains full.

- This is greenbelt land and as such there are no special circumstances to change its designation, contradicting MM9

- The additional traffic will heap pressure on Send cross roads

Attached documents:

I object to MM27, MM41, MM42 and MM48 Transport Strategy because;

- The traffic implications for Send as a result of proposed changes at Garlicks Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC has performed no proper assessment of the resulting aggregate traffic and the way that this will build up to every working day causing pollution, delays gridlock and noise.

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**I object to policy A42 change at Cockbarn in tannery lane because:**

- I believe it should not take place in the first place, however a further increase in the number of homes is proposed which make the situation even worse.
- The traffic in this area is getting worse and especially at the A247 junction.
- Green belt land is protected in law and I see no reason that it should be built on.

**Attached documents:**

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**Comment: MM9 - LPMM18/4177  Respondent: Zoe Kollov 15468833  Agent:**

**I object to MM9 Green Belt Policy because:**

- This introduces a loophole in the very clear current definition of Green belt land and the exceptional circumstances test and instead allows the question to be posed whether it boarders a village rather than whether it is green belt. No changes are necessary to this existing definition or rules.

**Attached documents:**

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**Comment: MM27 - LPMM18/229  Respondent: Nicholas Brown 15468993  Agent:**

MM27, MM41, MM42 & MM48

It appears that GBC has not carried out a proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road of building at Garlick's Arch, Burnt Common, Clockbarn and Alderton's. This transport strategy will witness a huge increase in traffic which will add to an already inadequate road system and will see an increase in noise, pollution, delays and gridlock. This is a very worrying prospect.

Send seems to have been singled out for a disproportionate increase in development when compared with neighbouring villages.

I hope that these objections are seriously taken into account.

**Attached documents:**

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**Comment: MM41 - LPMM18/225  Respondent: Nicholas Brown 15468993  Agent:**

[Attached documents]
I wish to register my strong objection to the latest modifications made by the Council to the local plan.

Specifically:

**MM41 Policy A43**

Despite 7000 objections a proposed 37% increase in the number of houses at Garlicks Arch is excessive.

We are faced with a continuous built up area joining Send and Ripley much of it Green Belt and some containing ancient woodland.

The increase in traffic will put a severe strain on already busy roads and increase pressure on infrastructure such as schools and local medical facilities.

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<td>MM42 Policy A58</td>
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<td>There are more appropriate brown field sites that should be utilised such as Slyfield which has unused capacity. This proposal clearly contradicts policy MM9.</td>
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<td>Again how are we meant to deal with the increase in traffic when local roads get gridlocked especially at rush hour?</td>
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Send seems to have been singled out for a disproportionate increase in development when compared with neighbouring villages.

I hope that these objections are seriously taken into account.

Attached documents:

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Why is this proposal even being considered? Removed from an earlier draft due to overwhelming objections we are now being faced with it being re-inserted. It seems somewhat under-handed to re-insert the proposal at the public examination in July.

It would forever change the whole character of the rural link between Send and Send Marsh making it into one long conurbation. 120 houses at Alderton's Farm is on Green Belt land and clearly contradicts policy MM9.

Traffic queues from the Send traffic lights are often very long and the associated increase in the number of cars from such a large development will exacerbate the problem. The road has a pinch point over a culvert were there have already been a number of road traffic accidents. The road here is already too narrow and prone to flooding. Any further development (this will form a considerable proportion of the 45% proposed increase in housing in and around Send) will overload the village infrastructure and detract from the heritage buildings on Send Marsh Green.

Attached documents:

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It appears that GBC has not carried out a proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road of building at Garlick's Arch, Burnt Common, Clockbarn and Alderton's. This transport strategy will witness a huge increase in traffic which will add to an already inadequate road system and will see an increase in noise, pollution, delays and gridlock. This is a very worrying prospect.

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- Excessive new industrial allocation of land
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- Green Belt land should be protected

**Attached documents:**

**Comment:** MM9 - LPMM18/1005  **Respondent:** Lorraine Ozanne 15472833  **Agent:**

**Objection to MM41, MM42, MM44, MM9 and associated Transport strategies**

I'm writing to formally object to the above Main Modifications on the following grounds:

- The excessive number of houses proposed
- Over development of Send and Ripley
- Excessive new industrial allocation of land
- Additional traffic causing major congestion of local roads and resultant safety concerns for pedestrians
- Green Belt land should be protected

I trust you will take these objections into consideration.

**Attached documents:**

**Comment:** MM2 - LPMM18/1405  **Respondent:** Robert Drummond 15473761  **Agent:**

The latest statistics demonstrate that the target of well over 600 new homes needed in Guildford is seriously overstated and is well under 400. The congestion in Guildford (particularly the A3 and A31) is extreme. The geography and lack of suitable funds make it very unlikely that these problems will be resolved let alone after the Blackwell Farm area is developed. This possibility will also damage one of the most beautiful, historic and iconic areas of the Hogs Back which the council should preserve at all costs. The resulting need of less houses can easily be handled by better management of residences in the town. Look at Woking who are building considerable high rise buildings when they stand in contrast with the flat surrounding area. Guildford has hills all around so higher buildings would not be as aggressive if built sensibly. There remain a number of unused town centre sites where planning could and should be given and they would be lower cost than the likely houses on Blackwell farm.

These new statistics should be a factor in the inspector re-opening the case for the extension of residential sites in particular the one at Blackwell Farm. Please include my view in your assessment of the local plan and any further review by the inspector.

**Attached documents:**

**Comment:** MM40 - LPMM18/2954  **Respondent:** Mr (Mr David Boothby) 15475841  **Agent:**

1687 of 2554
Having reviewed the submission I would like to register my complaint to that part of the plan dealing with the proposal for up to 2000 homes to be sited on/around the old Wisley Airfield.

This appears to be yet another backdoor approach to breaching the findings of recent Enquiries/Appeals that have rejected others’ plans for residential and commercial building to take place on the site.

I wish to add my note of complaint to the proposal and am against Guildford borough including the site within the local plan. I object to the number of houses under consideration and as a minimum request the considerations leading the number of dwelling amounting to 2000 be reconsidered as massively disproportionate and out of keeping with the supply of all current and likely proposed future services in the surrounding environs – to include inappropriate saturation of vehicle traffic (during construction and after any dwellings are built) on local traffic flow, abuse of an area of outstanding natural beauty, the desecration of the Green Belt which should remain sacrosanct, and levels of pollution already present and likely to be added to by any development.

Please keep me appraised of any developments relating to the inclusion of any housing stock at the old Wisley Airfield site and register my strong disagreement to its current proposed inclusion within the plan, in any case.

**Attached documents:**

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**Comment: MM27 - LPMM18/291  Respondent: M.M.L Prosser 15477089  Agent:**

What an extraordinary amount of building planned for Send Village; it would certainly stop being a village and turn into a town. However it would still only have one road going through which means traffic would be [unreadable text], and non-stop.

If you could build a flyover to Woking - great! [unreadable text] those extra people [unreadable text] doctor's surgery and one chemist and no extra school isn't feasible.

I do think a permanent gipsy site would be preferable to them parking, [unreadable text] ever they like and [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

Please have a rethink

**Attached documents:**

---

**Comment: MM41 - LPMM18/369  Respondent: M.M.L Prosser 15477089  Agent:**

What an extraordinary amount of building planned for Send Village; it would certainly stop being a village and turn into a town. However it would still only have one road going through which means traffic would be [unreadable text], and non-stop.

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Please have a rethink

**Attached documents:**

---

**Comment:** MM42 - LPMM18/289  **Respondent:** M.M.L Prosser 15477089  **Agent:**

What an extraordinary amount of building planned for Send Village; it would certainly stop being a village and turn into a town. However it would still only have one road going through which means traffic would be [unreadable text], and non-stop.

If you could build a flyover to Woking - great! [unreadable text] those extra people [unreadable text] doctor's surgery and one chemist and no extra school isn't feasible.

---

**Comment:** MM44 - LPMM18/290  **Respondent:** M.M.L Prosser 15477089  **Agent:**

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If you could build a flyover to Woking - great! [unreadable text] those extra people [unreadable text] doctor's surgery and one chemist and no extra school isn't feasible.

---
Comment: MM48 - LPMM18/293  Respondent: M.M.L Prosser 15477089  Agent:

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Attached documents:

Comment: MM2 - LPMM18/5881  Respondent: Margaret Bennett 15478273  Agent:

As a resident of Guildford for the last 33 years, I am concerned about the latest Guildford Plan.

1. The housing numbers do not reflect the latest ONS figures and projections and will lead to inappropriate development in the green belt.

Attached documents:

Comment: MM3 - LPMM18/5883  Respondent: Margaret Bennett 15478273  Agent:

3. The town centre policy, S3, does not address the infrastructure deficit.

Attached documents:

Comment: MM41 - LPMM18/5882  Respondent: Margaret Bennett 15478273  Agent:

2. There is no attempt in the Plan to address the fundamental issue of Guildford’s traffic problem. There is too much reliance on A3 improvements which are outside the council’s control.

Attached documents:
I am writing to make my OBJECTION to Main Modification 45, ie MM45 dealing with Policy A64, known.

No demonstration of meeting the Planning Inspector's challenge to bring forward a greater proportion of houses from the existing Local Plan sites

It is my understanding that MM45 is only included because at the Guildford Local Plan’s Examination in Public in June 2018 the Planning Inspector challenged Guildford Borough Council (GBC) to build a greater proportion of houses in the early part of the Plan period. MM45, along with several other similar main modifications, has been proposed to build additional houses in this time period. There has been no evidence that any replanning / rephasing of the existing Local Plan sites has taken place to consider how that challenge could be met within the existing draft plan. Having established a housing need, and identifying sites to create that housing supply, GBC have a responsibility to consider how the phasing of the housing supply could be met within those existing sites.

Proposed housing is in addition to the housing need identified in the Local Plan.

The existing housing need identified in the Local Plan is proven to be overestimated

Recently, the Office for National Statistics has released new figures relating to the number of new homes needed, and the current Conservative Government has released a new formula for estimating housing need required for economic growth. The GBC Local Plan figures are well in excess of these numbers. Therefore there cannot be a strong justification for redrawing the Green Belt around Flexford to create the proposed ~105 houses, especially since this is in addition to the existing Local Plan's figures.

The site identified in MM45 is "Red Sensitivity" Green Belt, and no "Exceptional Circumstances" demonstrated.

In particular, there has been no demonstration of the National Planning Policy Framework "exceptional circumstances" that required to remove this piece of "Red Sensitivity" Green Belt.

The proposal does not include any details on the site development, nor account for the demand on infrastructure or consider the activities surrounding the site. Therefore it would be there is no evidence that any consideration of the impact on the surrounding settlements has been made.

Attached documents:

This site was not in the original plan.

No special circumstances have been shown that would justify building a housing development on the green belt.

The infrastructure does not exist to support the additional road traffic that would be generated. The danger of traffic accidents and congestion would be high, when this number of additional cars is added to the existing level of traffic on small residential roads. Public transport would not bear the load: train fares are expensive - just look at the cost of the 5-minute journey from Wambourough to Guildford. It is cheaper to take the car and pay the parking charges. The bus service is sketchy and does not run daily; for example you can go to Guildford on a Tuesday or Friday if you happen to want to spend 3 hours there. Realistically, people will not walk to the Aldershot Road to catch the Kite bus because it is not close enough.

Attached documents:
Comment: MM2 - LPMM18/1557  Respondent: Jill Murphy 15502433  Agent:

My initial objection is to: MM41, MM42, MM44, MM9, MM27.

POLICY S2.

At the public examination the figure for Guildford. B. C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated.

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspect.

I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

Attached documents:

Comment: MM27 - LPMM18/1561  Respondent: Jill Murphy 15502433  Agent:

MM27, MM41, MM42, and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on Send Barns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM41 - LPMM18/1558  Respondent: Jill Murphy 15502433  Agent:

MM41 Land at Garlicks Arch, Send Marsh. Policy A43.

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.

This is an increase of 37% in the number of houses to be built and I can only assume that the Conservative Guildford Borough Council are punishing Send for throwing out the Conservative Councillors and electing Green Belt Councillors.
Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking.

This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

This site is contaminated by many years of Clay Pigeon Shooting and is prone to frequent flooding.

Up to a thousand cars and between 1600 to 1700 extra people will completely block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

Why have over 7000 objections to the earlier plan been ignored and more houses etc added ?

MM27. MM41. MM42.and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account ?

The increased traffic for Send from Burnt Common Garlicks Arch,Aldertons,Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

Comment: MM42 - LPM18/1559  Respondent: Jill Murphy 15502433  Agent: 

MM42. Land at Burnt Common,London road Send Policy A58.

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land why has again Send been picked on again to have the largest industrial allocation in any village in the Borough, is it politics ?

This is a further increase of 25% making it a huge increase in Send, bigger than any other village.

There is no need for new industrial sites when Slyfield is has unused capacity There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.

There is no need to put Industrial premises in our precious GREEN BELT, except if as a Council Cabinet you want to punish Send.

This plan has since being deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.

MM27. MM41. MM42.and MM48 Transport Strategy.
Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:

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**Comment:** MM44 - LPMM18/1564  **Respondent:** Jill Murphy 15502433  **Agent:**

MM44 Land at Aldertons Farm, Send Road, Policy A63.

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY.

With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%

How are our roads, sewage, water, healthcare, schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment.

Agin this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

Attached documents:

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**Comment:** MM48 - LPMM18/1562  **Respondent:** Jill Murphy 15502433  **Agent:**

MM27, MM41, MM42, and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

I have three Grandchildren who live on SendBarns Road and I despair at how their lives will be affected.

Attached documents:
Comment: MM9 - LPMM18/1565  Respondent: Jill Murphy 15502433  Agent:

MM9 GREEN BELT POLICY.

How can you say the modifications claim to protect our precious GREEN BELT except in very special circumstances?

GBC make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHOULD BE CONSIDERED TO BE WITHIN THE VILLAGE.

This is a catch all statement which is completely subjective causing complete uncertainty and completely negates GREEN BELT PROTECTION.

Virtually any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish the above objections to be considered and this huge imposition of housing and commercial development to be largely abandoned as Send Village is at present at bursting point.

Attached documents:

Comment: MM45 - LPMM18/4708  Respondent: Andrew Whitehall 15508257  Agent:

Location: GREEN BELT LAND in Normandy Main Modification 45 (MM45, dealing with policy number A64)

Proposal: To build 105 houses over 3 years on GREEN BELT LAND to the North of the railway line east of Glaziers Lane.

I am writing with regards to the above proposal to build 105 homes over 3 years on GREEN BELT LAND! Having lived in the village for most of my life and a child played in the proposed fields, I wish to strongly object due to the attributing factors listed below -

- Erosion of green belt land when there are brownfield sites, elsewhere in Guildford, far better suited with all the amenities already on their doorstep.
- Disproportionate & unsustainable development, on Green Belt land, what are the “exceptional circumstances” that justify taking this site out of the Green Belt?
- This is a completely new site that has NOT featured in any of the previous versions of the Local Plan.
- There are no existing facilities in Flexford which even the sustainability assessment accompanying the proposal admits.
- Destruction of rural environment where currently protected brown snakes, deer & other wildlife live, building houses on this type of land is not the way forward.
- The Council are ignoring the advice of previous planning inspectors that the fields of Normandy add to the openness of the green belt, hence all previous applications have, and rightly so, been refused.
- Glaziers Lane & Flexford Road are country lanes and are not remotely suitable for the vast increase of traffic that would ensue from building these houses.
- The congestion on the roads in Normandy is already a major issue with multiple delays & accidents not to mention the pollution.
- People actually move to Normandy for the open fields & try to give their families a safe and rural life, fully aware there are not large housing estates.
• Who is going to pay for the extra emergency services required to service this out of town area as this proposal would greatly increase the size of our village?

We have all been blessed with nature on our doorsteps, embrace it & protect it as it is so precious, if you agree for this to be all ripped away it will never, ever be replaced.

Surrey County Council has always prided itself on being one of the forerunners of providing green, open land for people to walk, ride & play in, don’t now destroy this legacy.

Attached documents:

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Guildford Borough Council has given no thought to the traffic implications of all this excess development proposed for the local area. The local roads are already approaching grid lock the A3 really suffers in peak period, the proposed changes to the Clandon slip roads will only make the A3 worse, I suppose traffic lights will be used to reduce the flow on to the A3 with even more problems in Send.

Attached documents:

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Comment: MM41 - LPMM18/4183  Respondent: Richard Golding 15509057  Agent: MM41 LAND AT GARLICK’S ARCH POLICY A43

I OBJECT TO THE POLICY MM41 Land at Garlick’s Arch:

The initial proposal is **totally incorrect** This land is GREEN BELT it contains two areas of ancient woodland 50% of the site is subject to flooding and is recognised locally as a FLOOD PLANE, it carries a flood zone 2 allocation any work carried out to reduce the area flooded would increase the likely hood of flooding in Send Marsh, the Environment Agency undertook work a few years ago in Send Marsh to reduce the risk, but any work on Garlick’s Arch could neutralise the good work done. But then to totally ignore the thousands of objections to the development and propose an increase in the development to 550 property's is putting an unfair share of development on Send.

If the proposed development of 550 houses and travelling peoples’ plots were built where will their surface water go, will it just be spirited away, it will certainly not soak into the ground under such a density of buildings.

The proposal for 550 homes totally ignores the thousands of previous objections made by local people. This amount of development has no doubt been based upon the fictitious figures in POLICY S2 of a requirement of 789 property's per year. A respected consultant Barton Willmore feels the correct figure should be 431 and in data released in September by the Office of National Statistics suggest a figure of 460 homes per year would be an appropriate growth in Guildford approx. 50 % of Guildford Borough Plans.

The ancient woodland on the site has protection under the NPPF section 118 even if one locates a development of this size adjacent to the woods it cannot fail to damage it. I do realise the policy does allow exception for thing of national importance, but this certainly fails to meet that standard. A UK wide state of nature survey undertaken in 2016 shows worrying trends, so Surrey Wildlife Trust landscape manager Mile Waite undertook a state of nature survey in Surrey and this showed that Surrey's flora and fauna appears to be fairing particularly badly with losses far higher than the national
level – 12% compared nationally 2%. Of a total of 404 priority species of national conservation concern almost 31% are locally extinct in Surrey while 37% are threatened or in worrying decline leaving 32% considered stable or recovering. The proposed development will not improve the situation it would have a negative effect.

This amount of development will join Send to Ripley and amounts to over development. This will also incur around another 1000 cars on the local roads with all the problems that will bring.

This proposal in addition to the other developments proposed will create an urban corridor the A3 which is completely against the whole principal of the GREEN BELT which was enacted to stop urban sprawl, it would also go against the government's claim that the GREEN BELT is safe in their hands.

Attached documents:

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Comment: MM41 - LPMM18/4188  Respondent: Richard Golding 15509057  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

Guildford Borough council has given no thought to the traffic implications of all this excess development proposed for the local area. The local roads are already approaching grid lock the A3 really suffers in peak period, the proposed changes to the Clandon slip roads will only make the A3 worse, I suppose traffic lights will be used to reduce the flow on to the A3 with even more problems in Send.

Attached documents:

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Comment: MM42 - LPMM18/4184  Respondent: Richard Golding 15509057  Agent:

MM42 LAND AT BURNT COMMON LONDON ROAD POLICY A58

I OBJECT TO THE POLICY MM42 Land at Burnt Common because: Since this site was deleted from the 2014 Local Plan due to objections yet put back into the 2016 Plan this current proposal looks too increase the development above the 7,000 square meters of warehouse or industrial units proposed in the 2016 Local Plan. To a Minimum of14800 square meters. Which must rate it as the highest proposed industrial development in any village in the borough. There is currently no requirement for more industrial units in Green Belt locations. Guildford and Slyfield currently have empty sites and there is a decline in the demand for such sites, the 2017 employment land need assessment shows a reduction in demand to 3.9 hectares for the whole borough, yet the council are proposing to destroy 10 hectares of Sends GREEN BELT for unnecessary units Totally ignoring 25% increase in the current Send Business Centre putting even more pressure on the local roads and adding to the development along the A3 corridor totally against the GREEN BELT policy. No doubt this will help with create very high levels of Nitrogen DIOXIDE.

Attached documents:

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Comment: MM42 - LPMM18/4189  Respondent: Richard Golding 15509057  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
Guildford Borough council has given no thought to the traffic implications of all this excess development proposed for the local area. The local roads are already approaching grid lock the A3 really suffers in peak period, the proposed changes to the Clandon slip roads will only make the A3 worse, I suppose traffic lights will be used to reduce the flow on to the A3 with even more problems in Send.

**Comment:** MM44 - LPMM18/4185  **Respondent:** Richard Golding 15509057  **Agent:**

**MM44 LAND AT ALDERTON’S FARM, Send Marsh Rd POLICY A63**

I OBJECT TO THE POLICY MM44 Land at Alderton’s Farm, Send Marsh Rd because:

this site is outside the boundary of Send Marsh it has already appeared in an earlier draft and been deleted due to reasonable objections to the development. The site is again green belt and the development would have a major negative detraction on the heritage buildings around the Send Marsh Green. It would also set a precedent, when any Developer could come along and make an application to undertake development within the green belt. With the other proposals that have been put forward for development there would increase the development in Send of 45%. Surely if the council use the Office of National statistic figures and spread the development around the borough a large amount of this green belt could be saved?

**Comment:** MM48 - LPMM18/4191  **Respondent:** Richard Golding 15509057  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

Guildford Borough council has given no thought to the traffic implications of all this excess development proposed for the local area. The local roads are already approaching grid lock the A3 really suffers in peak period, the proposed changes to the Clandon slip roads will only make the A3 worse, I suppose traffic lights will be used to reduce the flow on to the A3 with even more problems in Send.

**Comment:** MM9 - LPMM18/4186  **Respondent:** Richard Golding 15509057  **Agent:**

**MM9 GREEN BELT POLICY**

I object to the proposal to allow,” limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” this would enable the development to grow which would be totally out of keeping with the rural location, is totally against the government so called policy of protecting the green belt. It is in fact a Developers Charter allowing them to pick off odd pieces of land at will.
I am concerned to ensure that the corrected and lower figures for future housing demand are used as the basis for planned housing in Guildford.

Attached documents:

The Gosden Hill development proposal is unacceptable because of the impact that the additional road traffic that would inevitably result. This area of Guildford is already suffering from very bad and regular congestion along all main routes at peak times, and the impact of additional school runs and commuter journeys would have a disproportionate and wide adverse effect. The current frequent jams already create significant local pollution. Now it has become clear to all Planning Authorities just how detrimental to health vehicle exhaust pollution is (particularly for school age children), all large scale housing plans should include an impact study to avoid any development that would grossly overload surrounding roads and exacerbate existing pollution problems.

Attached documents:

I request the Inspector re-opens the Blackwell Farm plan, re-examines and amends to take account of the new lower figures of Amendment MM2:-

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes intown, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

Attached documents:

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MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.
MM36 - should Blackwell Farm be retained as Green Belt which also protects views from the AONB along the Hogs Back and removed from the Plan? Revised housing need figures weaken the justification for development.

Attached documents:

Comment: MM36 - LPMM18/5915 Respondent: John Griffiths 15570113 Agent:

MM37 - The proposed land for access road between the A31 and Blackwell Farm would harm the AONB.

Attached documents:

Comment: MM2 - LPMM18/4451 Respondent: Hazel Thompson 15571745 Agent:

This consultation does not include the chance to comment/object to the 40 houses and travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and the increase in size to the Send Business Centre despite the Wey Conservation area, these proposals are again devastating to the local roads in all of these areas, they are too narrow, often difficult to pass and have many blind spots, and the larger roads are already standing traffic during peak times, let alone at other times of the day, the small village cannot take any more development especially of the sizes proposed.

We do hope you consider our strong objections to all of the above, as not only us but our family and friends will be severely impacted. We are pensioners and are already finding the amount of traffic too much and has significantly risen in recent years, especially with commuters using our village as a cut throughs from the A3 and M25.

Attached documents:

Comment: MM27 - LPMM18/4447 Respondent: Hazel Thompson 15571745 Agent:

I have already discussed concerns about the local infrastructure and in particular in the additional traffic to surrounding roads. The proposed changes are not adequately addressed by the A3 and Clandon slip roads. There is great concern about local roads. There is no evidence of robust structured assessment of local roads, in particular Sendmarsh Lane, Send Barns Lane and Send Road as traffic moves towards Woking.

Attached documents:

Comment: MM41 - LPMM18/4443 Respondent: Hazel Thompson 15571745 Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Increased from 400 to 550 homes of which 450 to be built in the first five years
The site is Green Belt containing ancient woodland, which we believe should be protected. The proposals are overdeveloped for this area and it will join up Ripley and Send and will generate two much traffic to the already oversaturated roads.

This area is prone to flooding, having been born in the village, I know this area well. The village facilities of school and medical centre are already overstretched to breaking point.

Attached documents:

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**Comment:** MM41 - LPMM18/4448  **Respondent:** Hazel Thompson 15571745  **Agent:**

MM27, MM41, MM42 and MM48, Transport Strategy

I have already discussed concerns about the local infrastructure and in particular in the additional traffic to surrounding roads. The proposed changes are not adequately addressed by the A3 and Clandon slip roads. There is great concern about local roads. There is no evidence of robust structured assessment of local roads, in particular Sendmarsh Lane, Send Barns Lane and Send Road as traffic moves towards Woking.

Attached documents:

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**Comment:** MM42 - LPMM18/4444  **Respondent:** Hazel Thompson 15571745  **Agent:**

MM42, Burnt Common, Policy A58

The scale of the development here is my main concern, having been increased from 7000 to a minimum of 14800 sq m. Since having been deleted from the plan in 2014, the size of this site has been increased twice. The latest modification over doubles the size of the proposed industrial area. Slyfield has unused capacity so further increasing the area of this site again contradicts MM9. There is no proven demand for this site, yet it would potentially have a huge and completely unnecessary impact on the local road infrastructure.

Attached documents:

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**Comment:** MM42 - LPMM18/4449  **Respondent:** Hazel Thompson 15571745  **Agent:**

MM27, MM41, MM42 and MM48, Transport Strategy

I have already discussed concerns about the local infrastructure and in particular in the additional traffic to surrounding roads. The proposed changes are not adequately addressed by the A3 and Clandon slip roads. There is great concern about local roads. There is no evidence of robust structured assessment of local roads, in particular Sendmarsh Lane, Send Barns Lane and Send Road as traffic moves towards Woking.

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<td>MM44, Aldertons Farm, Policy A63</td>
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<td>I am astounded that this site has been included as a modification to the plan, having previously been deleted following strong objections. It is a greenbelt site with no special circumstances, again contradicting MM9. The size of this development is completely out of the nature of the surrounding areas and will detract from it. The proposed location is ridiculous. It would add traffic joining the already busy Sendmarsh Road and additional pressure on Send Crossroads. The housing quantity and density on this site concerns me greatly. Each home is likely to have at least 2 cars, given the local public transport links and the (currently) rural location. These additional cars cannot be sustained on the roads nearby. Development of this site is completely unjustified, especially in addition to all the other planned development.</td>
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<td>MM9 Green Belt Policy</td>
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<td>These proposals do not protect the Green Belt as claimed and causes considerable uncertainty and negates Green Belt protection in the area.</td>
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<th>Comment: MM2 - LPMM18/2488</th>
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<td>Dear Sir/Madam</td>
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<td>Ref: Guildford Borough Council’s Modified Local Plan consultation</td>
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<td>I would like you to note my following comments:</td>
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<td>A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.</td>
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B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic. There are already numerous dangerous instances of lorries and other large vehicles mounting the pavement in narrow spots where children and the elderly are walking.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.

2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.

3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.

4. The development of 1800 houses at Gosden Hill.

5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for redistribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to safely carry the existing traffic never mind the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway).
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph.
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The poor visibility for traffic exiting the road near the station due to the hump of the railway bridge. Increased traffic will significantly heighten the risk of accidents during peak hours.
5. The sight lines for the exit of the Onslow Arms car park.
6. The narrowness of the road near Summers.
7. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement.
8. The sharp bend near Clandon Regis.
9. The narrowness of the road at the Bull’s Head.
10. The Clandon Junior School and the, in places, narrow footpath for children walking to school.
11. The sharp bend with poor sight lines in either direction at the church.
12. No continuous footpath through the length of the village.
13. The speed of traffic.
14. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.
This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2490  Respondent: S Bennell 15571937  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

**Comment:** MM3 - LPMM18/2489  **Respondent:** S Bennell 15571937  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**F. The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

**Comment:** MM31 - LPMM18/2492  **Respondent:** S Bennell 15571937  **Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

**Comment:** MM32 - LPMM18/2493  **Respondent:** S Bennell 15571937  **Agent:**

MM32 A height limit for **White Lion Walk** is required.
Comment: MM33 - LPMM18/2494  Respondent: S Bennell 15571937  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Comment: MM35 - LPMM18/2495  Respondent: S Bennell 15571937  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Comment: MM41 - LPMM18/2496  Respondent: S Bennell 15571937  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Comment: MM44 - LPMM18/2497  Respondent: S Bennell 15571937  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Comment: MM9 - LPMM18/2491  Respondent: S Bennell 15571937  Agent:
In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM2 - LPMM18/5469  **Respondent:** Susan Palmer 15572641  **Agent:**

**Ref:** Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of
congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

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Comment: MM23 - LPMM18/5476 Respondent: Susan Palmer 15572641 Agent:

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**Comment:** MM3 - LPMM18/5473  **Respondent:** Susan Palmer  15572641  **Agent:**

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Attached documents:

Comment: MM35 - LPMM18/5484  Respondent: Susan Palmer 15572641  Agent:

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Attached documents:

Comment: MM41 - LPMM18/5485  Respondent: Susan Palmer 15572641  Agent:

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM42 - LPMM18/5486  Respondent: Susan Palmer 15572641  Agent:
MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Comment: MM9 - LPMM18/5472  Respondent: Susan Palmer 15572641  Agent:

MM9 In Green Belt, proposed limited *infilling outside identified settlement* boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Comment: MM41 - LPMM18/3322  Respondent: Ann Murray 15574497  Agent:

I object to Proposal MM41

Despite 7000 objections to this proposal an increase of 37% in the number of homes if proposed. This is Green Belt land and an ancient woodland. The joining up of Send and Ripley will constitute over development. This site floods and is contaminated by lead shot. The increase in the number of cars will cause traffic problems on the local roads. There do not appear to be any plans to build more schools or medical facilities in the village to cope with this large increase in population.

Comment: MM44 - LPMM18/3327  Respondent: Ann Murray 15574497  Agent:

I object to Proposal MM44

Previous objections to this proposal meant that it was deleted from the plan, only to be re-inserted after the public examination in July. Again this is part of the Green Belt with no special circumstances and contradicts policy MM9. Traffic from 120 homes will increase the pressure in the village. With developments at Garlics Arch, Clockbarn and Winds Ridge 770 houses will be added to the current 1700 in the village - an increase of 45%. The infrastructure cannot cope with this.

Comment: MM9 - LPMM18/3329  Respondent: Ann Murray 15574497  Agent:

I object to Proposal MM9

The GBC proposal of "limited infilling" of the Green Belt leaves land on the edges of the village open to developers and speculators.
The number of homes for this site seems to vary at every consultation - increasing without real justification or understanding of what the impact will be on Send. The roads surrounding this area are busy and congested at the best of times - all it takes is one delay on the A3 and the surrounding roads are flooded with extra cars, leading to massive delays. The local schools are already full, and one recently closed, increasing pressure on the area.

There are serious implications to this suggestion. The roads around are already busy and congested as Send is used by many as a through-fare to Woking. Nitrogen dioxide levels are already far too high. Why is there a need for a new industrial site in an inappropriate location when there is already spare unused capacity elsewhere - eg at Slyfield?

Why is this suggestion back again?? It was previously removed, as it had become obvious that this was not a good idea. In addition to other suggested locations, it increases the number of houses in Send by almost half - how on earth would any village already struggling to cope with traffic, school places etc be able to cope with such increases? The traffic lights in the centre of Send are gridlocked already at key times of day - this would only increase that, or increase the volume of traffic on very narrow roads in the vicinity.

* I wish to object very strongly about the recent late alteration (A64) to the local plan which proposes to destroy a significant part of the Green Belt.

* It will add about 7% to the population of Normandy and Flexford within 3 years which is far too soon to make improvements to the already overstretched local infrastructure.

*The sewerage system is overloaded now

*The hump bridge over the railway by the proposed extension is dangerous and the alternative bridge (under) in nearby Westwood Lane even more so.
*It seems very perverse that one of the justifications for the plan is to absorb some of Woking’s housing needs.

* I find the “exceptional circumstances” for building on the Green Belt completely unconvincing

**Attached documents:**

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**Comment:** MM27 - LPMM18/4166  **Respondent:** Karsten Kollov 15582817  **Agent:**

I object to MM27, MM41, MM42 and MM48 Transport Strategy because;

- The traffic implications for Send as a result of proposed changes at Garlics Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC has performed no proper assessment of the resulting aggregate traffic and the way that this will build up to every working day causing pollution, delays gridlock and noise.

**Attached documents:**

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**Comment:** MM41 - LPMM18/4171  **Respondent:** Karsten Kollov 15582817  **Agent:**

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- The traffic implications for Send as a result of proposed changes at Garlics Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC has performed no proper assessment of the resulting aggregate traffic and the way that this will build up to every working day causing pollution, delays gridlock and noise.

**Attached documents:**

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**Comment:** MM41 - LPMM18/4173  **Respondent:** Karsten Kollov 15582817  **Agent:**

I object to MM41 policy A43 change at Garlicks Arch because;

- I do not see any exceptional circumstances that should force the erosion of green belt land

- It will remove the 'green belt' between Ripley and Send that is necessary for the survival of our native species such as Hedgehogs

- It will generate further traffic that will clog up the area to the detriment of all those currently living here

- A further 550 homes will put further pressure on local services, which are currently at breaking point; transportation, hospitals, education etc.

- There is no proven requirement for travelling show people plots

- It will spoil the current beauty and openness of the area, which is what attracted my family and I in the first place.
Comment: MM42  LPMM18/4168  Respondent: Karsten Kollov 15582817  Agent:

I object to MM42, Policy A58 at Burnt common because;

- It was deleted from the 2014 draft because of all of the previous objections so I cannot understand why it has now been included again

- Industrial and warehousing could not be further from the idea of protected greenbelt land, Slyfield would be the obvious choice for such purposes as it already have the infrastructure and a grouping of similar businesses. This is not a good reason to irrevocably damage our Green Belt.

- I would like to leave my house in the future to my children and I want it to be surrounded by Green Belt land as it is now including all the nature that encompasses

- The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and since that point there has been a decline in the demand for such industrial land

- The 2017 Employment land Need assessment shows a reduction in demand to 3.9 hectares, rather than the massively inflated 10 hectares in send on the green belt

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

Attached documents:

Comment: MM42  LPMM18/4172  Respondent: Karsten Kollov 15582817  Agent:

I object to MM27, MM41, MM42 and MM48 Transport Strategy because;

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Attached documents:

Comment: MM42  LPMM18/4175  Respondent: Karsten Kollov 15582817  Agent:

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- It will generate further traffic that will clog up the area to the detriment of all those currently living here
- A further 550 homes will put further pressure on local services, which are currently at breaking point; transportation, hospitals, education etc.
- There is no proven requirement for travelling show people plots
- It will spoil the current beauty and openness of the area, which is what attracted my family and I in the first place.

Attached documents:

Comment: MM44 - LPMM18/4170  Respondent: Karsten Kollov 15582817  Agent:

I object to MM44, Policy A63 Land at Alderton's farm, Send Marsh road because;
- With Garlicks Arch (550), Clockbarn (60), Wind ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%, this is far too much for the area to cope with as its infrastructure is already creaking, the roads jammed and the trains full.
- This is greenbelt land and as such there are no special circumstances to change its designation, contradicting MM9
- The additional traffic will heap pressure on Send cross roads

Attached documents:

Comment: MM48 - LPMM18/4169  Respondent: Karsten Kollov 15582817  Agent:

I object to MM27, MM41, MM42 and MM48 Transport Strategy because;
- The traffic implications for Send as a result of proposed changes at Garlics Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC has performed no proper assessment of the resulting aggregate traffic and the way that this will build up to every working day causing pollution, delays gridlock and noise.

Attached documents:

Comment: MM9 - LPMM18/4167  Respondent: Karsten Kollov 15582817  Agent:

I object to MM9 Green Belt Policy because;
- this introduces a loophole in the very clear current definition of Green belt land and the exceptional circumstances test and instead allows the question to be posed whether it boarders a village rather than whether it is green belt. No changes are necessary to this existing definition or rules

Attached documents:
Comment: MM41 - LPMM18/1963  Respondent: mr Malcolm Murray 15583553  Agent:

I object to the proposals to develop land at Garlicks Arch.

The proposed site is mostly below road level and it would be extremely difficult to build suitable sound defences for the residents.

It is greenbelt land which floods regularly

There are insufficient infrastructure available now that the local school at Ripley has been closed together with an already overstretched doctors practice which has to cover Ripley & Send.

Attached documents:

Comment: MM44 - LPMM18/1964  Respondent: mr Malcolm Murray 15583553  Agent:

I object to the reintroduction of the proposals for the development of land at Aldertons farm. Send Marsh Road. Policy A63

This is Greenbelt land. There are far more appropriate brownfield sites in other areas of the county.

Attached documents:

Comment: MM9 - LPMM18/1965  Respondent: mr Malcolm Murray 15583553  Agent:

I object to the proposals to permit variations in the green belt policy MM9

The proposals would effectively give the County Council the ability to vary the settlement borders as often as they thought necessary. There is no justification for abandoning the present arrangements

Attached documents:

Comment: MM12 - LPMM18/1901  Respondent: West Horsley Parish Council (Mrs Catherine Young) 15583841  Agent:

I object to the term 'in consultation with' at MM12 2c, MM12 4, and MM12 4.3.54. The change of terms weakens the policy considerable. There must be agreement with Natural England. This effects other parts of the policy where the agreement has become 'woolly'.

The wording of this policy needs strengthening as there are now too many loopholes.

Attached documents:
Comment: MM2 - LPMM18/1898  Respondent: West Horsley Parish Council (Mrs Catherine Young) 15583841  
Agent:

I attended a meeting in West Horsley Village hall before the public hearings commenced in June this year. Paul Spooner, Leader of GBC, spoke about why there were plans to remove West Horsley from the Green Belt and blamed the Government for a substantial increase in housing that meant GBC had no choice but to look to the Green Belt. [text redacted: the text included a quote that was not wholly accurate]. It is outrageous that GBC made no attempt during the hearings to combat this number, and thus 42 extra houses per year have been added in for Woking. Does this mean that when it comes to voting for the Plan, Mr Spooner will vote no? I guess not, but then the rest of us will not be voting Conservative in the local elections next year.

There is no justification for the inflated housing numbers, especially when new lower numbers for housing need have been published by the ONS. The hearings should be re-opened and the GBC Executive need to take a closer look at their document!

The numbers of houses shown in all the charts in these policies do not represent protection of the Green Belt, and it seems to me that more should be done to look at availability within the Town Centre and on Brownfield sites.

I therefore object to the housing numbers proposed for West Horsley, and the insetting of the Village from the Green Belt as this is not justified and totally unnecessary. This is relevant to this policy as it is a reflection that the policy does not take into account accurate information.

Attached documents:

Comment: MM23 - LPMM18/1966  Respondent: West Horsley Parish Council (Mrs Catherine Young) 15583841  
Agent:

I OBJECT to the removal of Policy D4. There is not enough of this policy reflected in the other parts of D1 etc. If this policy is deleted there is not enough protection of views and the open rural landscape of much of West Horsley. I object to the fact that protection and respect for the local environment and it's wildlife has significantly watered down, or removed. There is no reference to protecting the dark skies of our villages.

I OBJECT to D1 point 7 where larger development do not need to have regard to the local character - I believe that this is in contradiction to the NPPF, and will give developers a free hand to build what they like, where they like, in what form they like. There has always been guidance to respect local character, form and density and I do not believe that GBC have the right to take that away.

Reference to the SPD on Design needs supported - this Guide has not been published and we do not know when it will be available. Therefore reference should be made to the existing guides and also Neighbourhood Plans where they are in place and significantly along the route of approval.

Attached documents:

Comment: MM9 - LPMM18/1900  Respondent: West Horsley Parish Council (Mrs Catherine Young) 15583841  
Agent:
There is no justification for removing villages from the Green Belt, or changing their boundaries - GBC have failed to give specific details of the exceptional circumstances that warrant this action.

The points provided regarding limited infilling are now confusing. The implication is that as a developer you can find a piece of land adjacent to the boundary of the village, prove it is part of the village, and build houses. This will have a serious impact on the village of West Horsley, already targeted for 285 new homes on 3 sites and a further 100 homes on a site in East Horsley that borders West Horsley. 385 new homes, with no new infrastructure proposed, no consideration of the environmental and social impact that these developments will have on the residents and wildlife is outrageous and uncalled for.

To state that limited infilling is not appropriate within the boundary of West Horsley, but then add that it may be appropriate outside of the settlement boundary if it can be considered to be 'within the village' is illogical and will set a dangerous precedent for more development, bringing great harm to the rural and open character of our village.

There is no provision within the NPPF for limited infilling outside of villages and therefore I object most strongly to the inclusion of the definitions of limited infilling.

**Attached documents:**

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**Comment:** Other comments - LPMM18/6  **Respondent:** Transport for London (Richard Carr) 15584513  **Agent:**

Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the schedule of main modifications

**Attached documents:**

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**Comment:** MM45 - LPMM18/695  **Respondent:** Christine King 15585217  **Agent:**

New Local Plan - New housing Normandy MM45, Row A64

I am surprised that, having had previous suggestions for development in Normandy turned down, another has materialised in the new local plan with no consultation with local people.

The land to the north of the Hog's Back is in an Area of Outstanding Natural Beauty. It is difficult to understand why this view is being disregarded. In addition, this development is on Green belt land. I can see no Exceptional Circumstances described that would allow this to happen. The creep of urbanisation west of Guildford is insidious, with little green space along the line between Wood Street and Ash/Aldershot. A64 should not be allowed to move the Green Belt safety ring and open the area for more possible housing.

The transport systems are inadequate for current housing, let alone another plot of this size. Only two buses twice a week go up Glaziers Lane, trains (of 3 carriages) only run half-hourly and are often cancelled completely during strikes. The A323 is often stationary at junctions such as the Wood Street turning during rush hours already. The surgery is already well used, there are no local food shops, pubs or cafes in the entire parish. How can this lack of facilities be sustained by such a development when there are none?

The infrastructure is simply not able to cope with a development of this size. The water and sewage systems are already under strain. Drains overflow in heavy rain and drainage from road and off the surrounding hills is already inadequate.
There is much controversy over the housing needs of Guildford Borough and it seems not to have taken the revised housing projections from the Office of National Statistics. The Brownfield sites in Guildford would no doubt be less convenient in terms of more small developments but short-term convenience should not override very real objections to infilling a rural community with poor infrastructure.

Attached documents:

**Comment**: MM51 - LPMM18/5255  **Respondent**: Philip Mason 15587585  **Agent:**

**Local Plan Amendment 1 Horsleys - West Horsley (South) MM51 - map page 84**

I am writing to support the above amendment to the local plan as it will protect the rural character of the village and the landscape in which it sits.

Attached documents:

**Comment**: MM2 - LPMM18/3728  **Respondent**: Oliver Hogben 15588033  **Agent:**

At a public examination the figure cited for housing need in GBC was 789 per year. It has been demonstrated without argument that this figure was greatly exaggerated. It was obtained by G.B.C Consultants and included, inexplicably, Surrey University Student numbers. There has deliberately been no response by GBC as to how these inaccurate figures were obtained. In contrast, Barton Wilmore have offered a realistic figure of 431 houses. This is supported by the Office of National Statistics, citing that appropriate growth in GBC can be achieved by 460 houses per year. I ask for transparency from the Inspector and GBC as to how their incongruous figure has been reached, against all other intelligence, and trust that the result of this data will now result in the housing need proposed actually reflecting the true figures. It also needs to take in to account the huge congestion that already exists in Send, which GBC seem entirely unaware of despite repeated indications of this from numerous residents.

Attached documents:

**Comment**: MM27 - LPMM18/3730  **Respondent**: Oliver Hogben 15588033  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

Send is a highly congested village. My own road, Potters Lane, is evidence of this; in July my parked car was written off by a council van when the driver found himself boxed in by rush hour traffic and panicked, driving in to the side of my car and then reversing in to the front of it. 'Road rage' is becoming a serious problem in Potters Lane, with almost daily conflicts; this was not the case when I moved in five years ago. My question, therefore, is why has the potential effect of thousands of extra cars in an already heavily congested area not been taken into account? Nothing has been done to address this in the most recent document.

Attached documents:
Comment: MM41 - LPMM18/3737  Respondent: Oliver Hogben 15588033  Agent:

MM41 Land at Garlicks Arch, Send Marsh (Policy A43)
I entirely object to the increase from 400 to 550 houses, of which 450 are to be built in the first 5 years. Our village school, medical centre, and dentist are already overflowing; it has become noticeably harder to make an appointment at the Villages Medical Centre in the last few years, and traffic in the village is regularly completely gridlocked. What does GBC think that 1600 to 1700 extra people will do to what is already a huge problem? Clearly, no thought has been put in to this whatsoever, nor has any consultation been listened to; over 7000 objections to the earlier plan have been treated with utter contempt by you.

Attached documents:

Comment: MM41 - LPMM18/3757  Respondent: Oliver Hogben 15588033  Agent:

MM27. MM41. MM42 and MM48 Transport Strategy
Send is a highly congested village. My own road, Potters Lane, is evidence of this; in July my parked car was written off by a council van when the driver found himself boxed in by rush hour traffic and panicked, driving in to the side of my car and then reversing in to the front of it. 'Road rage' is becoming a serious problem in Potters Lane, with almost daily conflicts; this was not the case when I moved in five years ago. My question, therefore, is why has the potential effect of thousands of extra cars in an already heavily congested area not been taken into account? Nothing has been done to address this in the most recent document.

Attached documents:

Comment: MM42 - LPMM18/3732  Respondent: Oliver Hogben 15588033  Agent:

MM27. MM41. MM42 and MM48 Transport Strategy
Send is a highly congested village. My own road, Potters Lane, is evidence of this; in July my parked car was written off by a council van when the driver found himself boxed in by rush hour traffic and panicked, driving in to the side of my car and then reversing in to the front of it. 'Road rage' is becoming a serious problem in Potters Lane, with almost daily conflicts; this was not the case when I moved in five years ago. My question, therefore, is why has the potential effect of thousands of extra cars in an already heavily congested area not been taken into account? Nothing has been done to address this in the most recent document.

Attached documents:

Comment: MM44 - LPMM18/3753  Respondent: Oliver Hogben 15588033  Agent:

MM44 Land at Aldertons Farm, Send Road, (Policy A63)
Why was a new site for 120 homes removed because of objections and then not reinserted until the public examination in July? No explanation has been provided for this. Over time, if your entirely illogical plan is carried out, there will be a 45% increase in the number of houses in the village. There is no explanation provided in any of your documentation as to how the village is expected to cope with this; GBC evidently has no awareness of infrastructure, traffic flow, local facilities. It is evident that not even the most basic of research has been conducted here.
Having lived in Kent, the West Midlands, and Oxfordshire before coming to Surrey, I have fast learned to have low expectations of GBC in comparison to every other local authority that I have lived in; in every respect, every service that you provide is the poorest that I have encountered in this country, and for the highest cost. This is one thing, but your utter contempt for the views of residents, and your total disregard for the fundamentals of urban planning is quite another. This local plan is a disaster; it must be abandoned in its entirety.

Attached documents:

Comment: MM48 - LPMM18/3734  Respondent: Oliver Hogben 15588033  Agent:

MM27. MM41. MM42 and MM48 Transport Strategy
Send is a highly congested village. My own road, Potters Lane, is evidence of this; in July my parked car was written off by a council van when the driver found himself boxed in by rush hour traffic and panicked, driving in to the side of my car and then reversing in to the front of it. 'Road rage' is becoming a serious problem in Potters Lane, with almost daily conflicts; this was not the case when I moved in five years ago. My question, therefore, is why has the potential effect of thousands of extra cars in an already heavily congested area not been taken into account? Nothing has been done to address this in the most recent document.

Attached documents:

Comment: MM2 - LPMM18/5654  Respondent: Louise Herbert 15589857  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation
I would like you to note my following comments:
A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.
B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
1. Guildford Borough Council has not properly observed its hierarchy of development.
   Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfill the criteria for ‘exceptional circumstances’.
C. I would like the Inspector to RE-EXAMINE the Local Plan because:
1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4,
   and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high
In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:
D. The Clandon Society Objections and Concerns Which I Share
The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.
The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247
I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technologically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:
1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
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10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker. The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/5665  Respondent: Louise Herbert 15589857  Agent:
Council in this consultation.
The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/5663  Respondent: Louise Herbert 15589857  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.
MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

F. The Guildford Vision Group’s Objections and Concerns Which I Share
The Town Centre must be designated a strategic site or sites
MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5666  Respondent: Louise Herbert 15589857  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.
MM31 A height limit for North Street is required.
MM31 There appears to be no allocation for an all-direction bus interchange

Attached documents:

Comment: MM32 - LPMM18/5668  Respondent: Louise Herbert 15589857  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5672  Respondent: Louise Herbert 15589857  Agent:
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

**Comment:** MM35 - LPMM18/5676  **Respondent:** Louise Herbert 15589857  **Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development. 
MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm. 
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

**Comment:** MM41 - LPMM18/5678  **Respondent:** Louise Herbert 15589857  **Agent:**

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

**Comment:** MM44 - LPMM18/5679  **Respondent:** Louise Herbert 15589857  **Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

**Attached documents:**

**Comment:** MM9 - LPMM18/5664  **Respondent:** Louise Herbert 15589857  **Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

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This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM23 - LPMM18/4096</th>
<th>Respondent: Eunja Madge 15590273</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM23 In (9) strategic sites should not be exempt from a requirement to reflect <strong>locally distinct</strong> patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.</td>
<td></td>
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<tr>
<td>MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address <strong>character</strong> adequately.</td>
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<tr>
<td>MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.</td>
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<tr>
<td>MM23 If (D1) does not capture the qualities, including landscape, to be protected along the <strong>Wey Corridor</strong> then MM29 should be amended to specifically provide for this.</td>
<td></td>
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<tr>
<td>MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A <strong>height limit</strong> should be introduced given the importance of the rise and fall of the downs in the urban landscape.</td>
<td></td>
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</tbody>
</table>
MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

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MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

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MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

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MM32 A height limit for White Lion Walk is required.
Comment: MM33 - LPMM18/4100  Respondent: Eunja Madge 15590273  Agent:  

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/4101  Respondent: Eunja Madge 15590273  Agent:  

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/4103  Respondent: Eunja Madge 15590273  Agent:  

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/4104  Respondent: Eunja Madge 15590273  Agent:  

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/4095  Respondent: Eunja Madge 15590273  Agent:  

1732 of 2554
MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM41 - LPMM18/3071  **Respondent:** Nigel Freebody 15590849  **Agent:**

**I object to** the proposed large scale development at Garlic Arch site. Numerous brownfield sites already exist within the borough without the need for further erosion of Surrey’s unique green belt assets. The Local Plan offers no justifiable reasons for any Green Belt exception for the Garlicks Arch site.

**I object strongly to** the proposed destruction of the woodland area at Garlic Arch. The Local Plan offers no justifiable reasons for any Green Belt exception for the Garlicks Arch site and in particular the proposed wholesale destruction of valuable ancient mature woodland. If new homes are to be built on the site, the woodland area must be removed entirely from any proposed development and preserved for future generations.

**I object strongly to** the unjustified increase in proposed number of new houses at Garlicks Arch (MM41) on the Ripley/Send borders. Despite numerous objections to the original proposals for 400 new homes, the revised Local Plan ignores these and seeks to increase the proposals to 550 new homes. No adequate justification has been offered for this proposed 37% increase.

**I object to** the proposed development timelines for the Garlicks Arch (MM41) sites. The revised Local Plan proposed 550 new homes at Garlic Arch, some 450 of which are to be built in the first five years. The speed of this rollout at one site within the borough is excessive and does not allow adequate time for the expansion of the required local support services and facilities.

**I object to** the inevitable increase in traffic that would result from the Garlicks Arch development proposals. The local road infrastructure is already at bursting point, particularly at school run and commuting times. The proposed large scale development of the site will inevitably bring a substantial increase in traffic on already congested roads, leading to further erosion of greenbelt land for required new relief roads.

**I object to** the increased industrial sites at Garlic Arch (site A43). Existing brownfield sites within the borough are already far better suited to these industrial developments without the need to destroy additional Green Belt land.

**I object to** the proposed development of increased number of homes at the Garlicks Arch (because, as outlined in previous objections, both these areas are strategic for the natural absorption of local rainwater runoff. Additional homes over and above the previously stated limit of 400 homes will only further exacerbate the water runoff problems and further increase the flood risk.

**Attached documents:**

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**Comment:** MM8 - LPMM18/3072  **Respondent:** Nigel Freebody 15590849  **Agent:**

**I object to** the number of showpeople plots currently in the revised Local Plan. The proposed allocation is disproportionate to the number of possible new homes within the Ripley, Send and Clandon area as compared with other local development plans, such as the Wisley aerodrome site. There is no justification for such inclusion within the Green Belt area and sacrifice of Green Belt land for this purpose seems nothing less than cavalier.

**Attached documents:**
I object to the manner in which the revised draft Local Plan, which still includes the wholesale destruction of Green Belt land, has been pushed through the local planning process without any apparent consideration or due concessions to the thousands of valid and justifiable objections previously raised.

I object to the increase in industrial allocation at the Burnt Common site (MM9). Despite numerous objections to the original proposals for 7,000 sq.m of the industrial floor space, the revised Plan now proposes “a minimum of 14,800 sq.m”. This is excessive and will be very damaging to the local environment. There are already large scale and underutilised brownfield sites within the borough that would be far better suited to any possible requirement for such development.

I object to the proposed insetting of the green belt land within the villages of Ripley, Send and Clandon. The revised proposals appear to make no concessions to any of the thousands of previously submitted objections made in respect earlier drafts of the Local Plan. Rather, the proposed amendments seek to expand the proposed new developments resulting in erosion of the unique individuality of the local villages.

Attached documents:

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I object to MM13 as there is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing.

Attached documents:

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I wish to take this opportunity to object to the following modifications to the local plan. The result of including these modifications would have a devastating effect on the lives of the people who live in the villages of Send, Ripley and Ockham. As a local resident, born and brought up in the area, I am aware that development is necessary if our children are to be able to stay in the area. Destroying village and community life, as would happen if all of these plans go ahead, is not the answer.

I object to MM2 as the housing target is wrong. As a result, I ask that the hearing be reopened so that the latest ONS figures and household projections can be taken into account. In addition, there should be no requirement for Guildford to take Woking’s unmet need, particularly as this will require further green belt release. The council has not properly followed its spatial strategy, which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Although we are now only able to comment on the main modifications of the plan, it should be noted that the 100 houses proposed for Send Hill and Clockbarn, along with the 25% increase in the Send Business Centre. If this is added to the points covered above, it is clear that the heavy concentration of housing and industrial sights in Send will bring an end to
the village and the life of its inhabitants. Why the concentration in Send when the load could be shared more equably and more fairly with all of the other villages in the borough.

I believe that the local council has a duty of care to the communities they serve. We hope that these members have the best interests of their residents at heart. If this is the case, the objections above cannot be ignored.

**Attached documents:**

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**Comment: MM2 - LPMM18/3676  Respondent: John Thompson 15591585  Agent:**

I should like to raise my objections to the proposed development of a number of sites in the village of Send. As you can see from the above, I am a resident of Ripley, but the lane in which I live is on the borders of the two villages and any development in Send will have a profound impact me and my family. In addition to this, I was born in Send and, therefore, feel that I have the right to air my views in the hope that some sanity may prevail.

**Attached documents:**

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**Comment: MM23 - LPMM18/3671  Respondent: John Thompson 15591585  Agent:**

I object to MM23 (Policy D1) as it waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes). All means of travel should be accessible and helping to reduce the dependence on the motor car.

**Attached documents:**

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**Comment: MM27 - LPMM18/3683  Respondent: John Thompson 15591585  Agent:**

I object to MM27, MM41, MM42, MM48 Transport Strategy

The cumulative impact on the traffic and pollution issues on the village, when all of the proposed developments at Garlick's Arch, Clockbarn, Alderton's Farm, Gosden Hill and Wisley and Ockham, is totally unacceptable. Our road systems are already heavily congested, especially at key points in the day. My daughter lives on Send Road where it is often difficult to enter and exit her drive because of the ceaseless flow of vehicles. Crossing the road is perilous. The pollution levels are a real cause for concern as I have a young grandchild. We already know that far too many of today's youngsters suffer from asthma, a direct result of the increasing levels of pollution. This can only be exacerbated if these proposals go ahead.

**Attached documents:**

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**Comment: MM40 - LPMM18/3672  Respondent: John Thompson 15591585  Agent:**

The village and the life of its inhabitants. Why the concentration in Send when the load could be shared more equably and more fairly with all of the other villages in the borough.

I believe that the local council has a duty of care to the communities they serve. We hope that these members have the best interests of their residents at heart. If this is the case, the objections above cannot be ignored.

**Attached documents:**
I object to A35 – Three Farms Meadows

The addition of land to the south of the appeal site does not mitigate the density issue as much Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB

Attached documents:

Comment: MM41 - LPMM18/3669  Respondent: John Thompson 15591585  Agent:

I object to MM41 as the transport strategy relies on inadequate modelling, including the delay in J10 Highways England RIS scheme of at least two years which will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm]. There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM41 - LPMM18/3677  Respondent: John Thompson 15591585  Agent:

I object to MM14 - Garlick's Arch, Send Marsh, Policy A43

In the revised proposals the number of houses proposed for this site has been increased from 400 to 550 houses. This is an increase of 37%, despite the fact that the council received 7,000 objections to the initial plan. This is green belt land, containing ancient woodland, which seems to mean nothing to those who wish to see this part of the borough concreted over. This development would, in effect, destroy the individual nature of the two villages, joining them into one mass and, as such, must surely be considered as over development. The addition of so many people in this area would stretch the local services beyond capacity. There is only one primary school in the area as the other, in Ripley, has been closed. Also, the doctors surgery would not be able to cope with such a significant increase in patients. The addition of 800 extra cars on our already congested roads does not bear thinking about. The road in which I live is already a rat run, used by motorists who drop off the Portsmouth road at the Send Marsh junction. We already feel that we cannot walk along our road in the mornings and evenings due to the high volume of traffic. Polesden Lane is single track along much of its length and has no footpaths. Additional traffic along here would make our lives even more stressful.

Attached documents:

Comment: MM41 - LPMM18/3684  Respondent: John Thompson 15591585  Agent:

I object to MM27, MM41, MM42, MM48 Transport Strategy

The cumulative impact on the traffic and pollution issues on the village, when all of the proposed developments at Garlick's Arch, Clockbarn, Alderton's Farm, Gosden Hill and Wisley and Ockham, is totally unacceptable. Our road systems are already heavily congested, especially at key points in the day. My daughter lives on Send Road where it is often difficult to enter and exit her drive because of the ceaseless flow of vehicles. Crossing the road is perilous. The pollution levels are a real cause for concern as I have a young grandchild. We already know that far too many of today's youngsters suffer from asthma, a direct result of the increasing levels of pollution. This can only be exacerbated if these proposals go ahead.
Comment: MM42 - LPMM18/3678  Respondent: John Thompson 15591585  Agent:

I object to MM42 - Land at Burnt Common, London Road, Send, Policy A58

I find it unfathomable how this site can have been deleted from the original plan and then increased twice, doubling its size from the initial proposal of 7000 square feet to 14,800 square feet. This is totally unnecessary when Slyfield has unused capacity. As such, it means taking green belt land when an already developed area is available. This is in addition to the 25% increase at Send Business Centre. These proposal constitutes the largest new industrial allocation in any village in the borough. There are no special circumstances and, therefore, this also contravenes MM9. To say that this is unfair is an understatement. In addition to this, the Employment Land Need Assessment showed a reductions in demand, not an increase, making such development unnecessary. Once again, I return to the issue of road congestion and, inevitably accompanying this, increased pollution. Nitrogen dioxide levels in the area are already dangerous. This traffic will have a knock on effect to the surrounding areas, which, once again, will impact negatively on our lives.

Attached documents:

Comment: MM42 - LPMM18/3688  Respondent: John Thompson 15591585  Agent:

I object to MM27, MM41, MM42, MM48 Transport Strategy

The cumulative impact on the traffic and pollution issues on the village, when all of the proposed developments at Garlick's Arch, Clockbarn, Alderton's Farm, Gosden Hill and Wisley and Ockham, is totally unacceptable. Our road systems are already heavily congested, especially at key points in the day. My daughter lives on Send Road where it is often difficult to enter and exit her drive because of the ceaseless flow of vehicles. Crossing the road is perilous. The pollution levels are a real cause for concern as I have a young grandchild. We already know that far too many of today's youngsters suffer from asthma, a direct result of the increasing levels of pollution. This can only be exacerbated if these proposals go ahead.

Attached documents:

Comment: MM44 - LPMM18/3679  Respondent: John Thompson 15591585  Agent:

I object to MM44 - Land at Alderton's Farm, Send Marsh Road, Policy A63

I cannot understand why his proposed development was deleted from an earlier draft as a result of all of the objections and only re-inseted in July. this is a Green Belt site with no special circumstances and, once again, contradicts MM9. The increased traffic on Send crossroads will be considerable and, when considered alongside the other proposals, result in a 45% increase in housing in the village. This is clearly unfair, unacceptable and asking the impossible of our infrastructure. No one is disputing the need to build in order to provide homes for people, but the scale of these proposals will destroy the village of Send and merely contribute to the urban sprawl. It seems that Guildford Borough Council has its sights set on this destruction. Is it purely cynical to wonder why so much of the county's building plans concentrate on two small villages, Send and Ripley, both held by members of minority groups on the Conservative led council?
Comment: MM48 - LPMM18/3692  
**Respondent:** John Thompson 15591585  
**Agent:**

I object to MM27, MM41, MM42, MM48 Transport Strategy

The cumulative impact on the traffic and pollution issues on the village, when all of the proposed developments at Garlick's Arch, Clockbarn, Alderton's Farm, Gosden Hill and Wisley and Ockham, is totally unacceptable. Our road systems are already heavily congested, especially at key points in the day. My daughter lives on Send Road where it is often difficult to enter and exit her drive because of the ceaseless flow of vehicles. Crossing the road is perilous. The pollution levels are a real cause for concern as I have a young grandchild. We already know that far too many of today's youngsters suffer from asthma, a direct result of the increasing levels of pollution. This can only be exacerbated if these proposals go ahead.

Attached documents:

Comment: MM48 - LPMM18/4190  
**Respondent:** John Thompson 15591585  
**Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

Guildford Borough council has given no thought to the traffic implications of all this excess development proposed for the local area. The local roads are already approaching grid lock the A3 really suffers in peak period, the proposed changes to the Clandon slip roads will only make the A3 worse, I suppose traffic lights will be used to reduce the flow on to the A3 with even more problems in Send.

Attached documents:

Comment: MM50 - LPMM18/3673  
**Respondent:** John Thompson 15591585  
**Agent:**

I object to MM47 as the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary. The biodiversity of the SNCI will be destroyed by the proposed development. An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Attached documents:

Comment: MM9 - LPMM18/3667  
**Respondent:** John Thompson 15591585  
**Agent:**

I object to MM9 as the infilling in and around villages will result in the weakening of protection of the countryside. If this modification of the local plan is accepted it will result in the loss of separate identities for the villages if Send and Ripley.
Comment: MM9 - LPMM18/3680  Respondent: John Thompson 15591585  Agent:

I object to MM9 - Green Belt Policy

The claim that the modifications protect the Green Belt 'except in very special circumstances' is questionable. The inclusion of 'limited infilling outside the settlement boundaries where it can be demonstrated that the site should be considered to be within the village' is highly subjective and open to interpretation. It does not constitute protection for the Green Belt in any way.

Comment: MM45 - LPMM18/5310  Respondent: Jane Owen 15594657  Agent:

Re the Planning application of houses on Green Belt Land Main modification 45

I don't believe that there has been sufficient documented information as to why the Previous Green Belt land should be utilised for a housing development.

There should only be exceptional circumstances for this to happen and there are plenty of brownfield sites that remain unused. So I am against the proposal of utilising green belt land.

Comment: MM45 - LPMM18/5308  Respondent: Nicky Ford 15601377  Agent:

My objection to Policy A64 is based on the impact that building 105 new houses will have on Glaziers Lane. The road is already very busy, especially during rush hour because it links the Hogs Back with the Aldershot road into Guildford. 105 new houses would mean roughly 200 more cars using the road daily, which would put immense strain on the traffic.

Also the Hogs Back is an Area of Outstanding Natural Beauty and the views from it would be spoilt by such a big new development.

So my vote is against Policy A64.

Comment: MM12 - LPMM18/90  Respondent: Mr Martin Billard 15601857  Agent:

I object to MM12
Para 1. Unlikely does not mean not. Natural England must agree. The original wording should remain.

Para 2c. Consultation does not mean agreed. Natural England must agree. The original wording should remain.

Para 4.3.54 Consultation does not mean agreed. Natural England must agree. The original wording should remain.

Para 4.3.60 As above the original wording should remain.

With GBC intent on carving up our greenbelt and SPA zones with an increasing amount of dwelling Natural England must be in agreement rather than in consultation.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM19 - LPMM18/91</th>
<th>Respondent: Mr Martin Billard 15601857</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to all changes to MM19</td>
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<tr>
<td>This is tempting children to leave school and buy junk food.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM2 - LPMM18/87</th>
<th>Respondent: Mr Martin Billard 15601857</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>I object to amendments in MM2</td>
<td></td>
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<tr>
<td>Table S2a shows a total of 15107 homes which is 2507 over target. By not having these extra homes there is enough reason to eat into greenbelt for so many developments.</td>
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<tr>
<td>There is no re-calculation for other sites now freed up for development when taking into account sites with no affordable housing or S106 on site between 5 and 10 which has been National Planning Policy since 2014 but ignored by GBC.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM22 - LPMM18/92</th>
<th>Respondent: Mr Martin Billard 15601857</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to MM22 and it should be deleted.</td>
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<tr>
<td>No planning has been gained there are a massive amount of objections and the GBC are presuming they can just wipe pubic opinion away. This is a council who just lets people down for money,</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM4 - LPMM18/88</th>
<th>Respondent: Mr Martin Billard 15601857</th>
<th>Agent:</th>
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</thead>
</table>

1740 of 2554
I object to the amendments in MM4

GBC has made up its own numbers for site allocations and the number of units on each site many against public objection and interest so causing harm to the Borough. They should not be able to resist if it is against overpowering public objections and against public interest. Allocating a site and then then making up the numbers especially in greenbelt is wrong and criminal.

Attached documents:

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Comment: MM41 - LPMM18/4025  Respondent: Mr Martin Billard 15601857  Agent:

I formally object to: MM41 Land at Garlicks Arch, Send (policy A43)

Garlick’s Arch

I object to MM41(1) To the increase numbers from 400 to 550.

It seems criminal that Guildford Borough Council are prepared to allocated this site by underhandedly moving a settlement boundary and taking land out of greenbelt. This is a breach of its own policies it has protected for years.

It seems criminal to have Public Consultations where there was an overwhelming “common sense” “objection” and then just ignore public comment. Not only is GBC acting in the worst interests of its constituents it is also acting in the worst possible interest for its own and our future.

The whole planning system is flawed and corrupt for this development is to be considered.

The Governments survey into projected growth in population and housing has been proven wrong and GBC should address this prior to opening up greenbelt for development.

The Governments track record for housing is appalling and this is just another mistake that GBC are corrupt enough to go along with as it will generate a massive income for them.

GBC and Surrey County Council can’t cope at present with its excessive traffic, road repairs, lack of school places, refuse collection problems, environment issues, increase in crime, burdens on stretched health services and this site by virtue of its numbers and location will add dramatically to all of these issues.

4 years ago, GBC refused application 14/P/00219 to build 25 houses due to no special circumstances to build on greenbelt. This is still the case more money and a flawed survey are not special circumstances.

2 years ago, GBC refused application 16/P/00783 to build 9 houses due to no special circumstances to build on greenbelt. This is still the case more money and a flawed survey are not special circumstances.

The land is greenbelt and should remain so as there are no special circumstances to change this.

The land is green belt and should remain so out of public interest.

The site is in the “SPA” zone (which GBC will be happy to take money to brush over) and then charge dog walkers to use “their” empty countryside car parks.

GBC are changing the wording in the Local Plan so to brush off Natural England which is corrupt.

There’s significantly insufficient infrastructure “none to be exact” to support any development.
There are not sufficient nearby schools. This will lead to school overcrowding and more traffic going into Guildford and Woking. Ripley school has recently closed thanks GBC!

The only local medical centre is already at full capacity and doctors are short in numbers.

The site is at the limits for the emergency services to attend quickly and the increase in local traffic will put local lives at even more risk.

There will be a massive increase pollution from the extra stationary traffic which will cause health issues.

There is ancient woodland and protected trees on the site which are in danger or could be lost forever.

The site is subject to frequent flooding, it is low lying and the soil structure means this cannot be avoided.

An establish and active local sporting ground will be lost.

There are no local shops or amenities other than one petrol station.

Due to the lack of amenities all the new residents will be using cars for every activity, work, schools, play even the nearest pubs are over a mile away causing traffic havoc and excessive pollution.

Any development in this area would be totally inappropriate and would be detrimental of Send Marsh and Burntcommon as a village.

A development of this scale will be out of keeping and over development once you consider building back from the A3, road infrastructure and avoidance of building under electricity power cables.

Thousands of people have already objected to the development of this site for less units.

If the proposal goes ahead people living next to the A3 will be subject to terrible noise and air pollution and any noise cancelling measures put in will have an adverse effect on houses further out from the A3.

The traffic survey done by MK planning and transport says there will be an additional 24 cars per hour at peak times for just 50 dwellings that’s 120 per hour for all 550 proposed dwellings. Perhaps members of the Planning Department and Council should be bothered enough to visit the area at peak times and figure out how another 120 cars will filter out onto the A247 or Portsmouth Road. It can take over 5 minutes now. They will soon realise that any increase in traffic will have a serious burden on all local residents in cars, on foot or on a bicycle. This increased traffic will spill over into Guildford and Woking town centres as well as local country roads. If members do bother to visit they will also see that the road surface of the bridge going over the A3 is worn out and it was replaced not long ago proving the traffic flow is at capacity. Any increase in traffic will make crossing the A247 by foot a higher risk than it is already and I challenge members of GBC to try this at 8am.

This development will cause a genuine risk to life for anyone living near it or on it due to the extra traffic.

There is an insufficient need for affordable housing at the scale that the Local Plan will require at 40%.

The route to public rail transport is down a fast, narrow road with no lighting, or even a footpath on both sides nor crossing points so lives will be put at risk.

I object to MM41(0a) to the main access being off A247Clandon Road.

It is already difficult and dangerous trying to pull out onto the Clandon Road by car at present let alone with traffic from 550 new houses with probably over 1000 more cars leaving or returning each day. GBC own report states 24 cars per 50 dwellings at peak times that’s 120 for the whole development in just one hour.
The A247 through Clandon to the A246 is very narrow and twisty with a number of blind accesses including from the railway station, the school and the 2 pubs let alone quite a few private houses the extra traffic will no doubt cause many more accidents if not deaths.

The road is extremely dangerous to cross on foot at present let alone with more traffic as there are no crossing points.

The A3 is often backed up from Burpham at this junction this site will only add to this.

The A3 is backed up from the M25 to Ripley every day and this site will only add to this.

Send Barns Lane and Send Road cannot take any more traffic without seriously putting children accessing schools at risk on death outside their schools and Send Park.

Cycling on local roads is already dangerous without increased traffic from 550 new houses.

I object to MM41(0b) to the through road from the B2215 Portsmouth Road and the A247.

There is no such thing a Send Marsh roundabout. GBC should learn its own geography before proposing 550 new homes on it.

The route will not relieve pressure on the roundabout but the 1000s of extra cars will add to it.

If it is acknowledged there is pressure on the nearby roundabout don’t build 550 new houses nearby.

The increased road usage is likely to cause incidents, accidents if not fatalities.

There will be a loss or damage to established trees and ancient woodland.

It will isolate further the proposed new development from the existing village.

This will be a cut through and cause harm to people who bought their properties to enjoy their current view and peaceful country lane feel.

The huge increase in traffic will produce noise pollution detrimental to existing residents.

The huge increase in traffic will produce air pollution harmful to all resident.

Refuge collection will be more difficult and dangerous.

It will cause traffic havoc at both ends of the roads.

It is a pathetic idea.

I object to MM41(0c) to the Permeability for pedestrians and cyclists into the development etc

The word “Permeability” does not really make sense in this instance.

There are no close amenities for pedestrians to walk too, if the development goes ahead the extra traffic will make local roads and pavements too dangerous, busy, noisy, unpleasant and toxic to walk down or cross just for pleasure.

However, it is dressed up, 1000s of more cars will put cyclists and pedestrians lives at risk especially children’s lives.

I am in FAVOUR of to MM41(0d) Necessary and proportionate contribution towards an off-site walking and cycle network to the village centre of Send, the Burntcommon Warehouse site and Clandon railway station.

Asking for a contribution to fix the existing problems GBC has ignored seems like a good idea.
Any improvement to local infrastructure will be welcome.

Any contributions must be safeguarded and actually spent on these improvements prior to the development’s commencement.

Proportionate must cover the risk to life from the lack of safe light controlled, crossing places to safely get to Send which should include two at Burntcommon roundabout, one outside the school and one opposite the park at least. This will obviously have the adverse effect of backing up the quite often already stationary traffic even further and with the increased traffic from the development it will cause grid lock, extra air pollution and noise pollution and an increased risk of death as drivers jump lights to try and speed up their journey. There are no adequate cycle lanes so major road works and moving of pavements will be necessary but the improvement will be highly regarded by all except by motorists or whoever is footing the bill.

Access to the warehouse will require lights at Burntcommon roundabout, this will obviously have the adverse effect of backing up the quite often already stationary traffic even further and with the increased traffic from the development it will cause grid lock, extra air pollution and noise pollution and an increased risk of death as drivers jump lights at a blind spot unless a compulsory purchase is made of some front gardens to build new pavements at a correct position for a crossing. The extra pavement and cycle way are relatively straight forward.

The walk to Clandon station is just over a mile away and is down a fast, busy narrow road with narrow footpaths and in need of a number of necessary crossings points due to the lack of footpaths and the A3 junction. The road speed limit will need to be reduced which will add to local traffic problems. There will need to be at least two light controlled crossings which will cause traffic problems and or 500m of pavement on private land. The road is too narrow for a cycle path and the footpaths are not on both sides the whole distance and are too narrow to share with bikes so cyclists will still be put at risk from the extra 100’s of cars or pedestrian at risk from bikes on the footpath.

I object to MM41(0e) Necessary and proportionate contribution towards mitigation schemes to address the otherwise adverse material impacts on communities and the environment …

There are no details about any proposed mitigation schemes so how can you gauge what is proportionate.

Are Guildford Borough Council just trying to collect more money from the development and then do nothing.

Guildford Borough Council are not acting in the best interests of its constituents acknowledging there will be adverse material impacts on communities and then believing collecting contributions is better than looking after this very community in the first place, especially when they overwhelmingly used common sense and objected to this development of the countryside.

Guildford Borough Council are not acting in the best interests of its constituents acknowledging there will be an adverse impact to the environment from this development which they are not only backing they are trying to make it bigger so the impact is greater. There is no amount of contributions that can fix the environmental damage this development will cause.

I am surprised Guildford Borough Council only acknowledges this impact is as far reaching to include Send, West Clandon and Ripley. The impact will be far greater reaching when the 100’s of extra cars block up Guildford for the school run, work commute and shopping trips, when the A3 is log jammed everyday it isn’t now. Then there is the impact on hospitals, emergency services and schools who are already begging for more money and help. Then there is the impact on lives when people die or are injured on the ever, busier roads or from pollution Money cannot by back a life.

I object to MM41(0f) Increase landscaping buffer/strategic planting etc

The best place to set back the development is Burnt Common Lane and the Portsmouth Road as there will be issues building closer to the A3 as it is greenbelt, there is inadequate infrastructure and a health risk to name just a few.

No amount of planting or landscaping will hide the A3 noise pollution from these new houses or these houses and their extra cars noise from the or surrounding roads.

Landscaping will have no effect on the air pollution on a low-lying site next to one of the busiest roads in Surrey.
There is not enough room for 550 dwellings and the trees needed to hide them.

Who will continue to take care of this extra landscaping, buffers and strategic planting when the developer departs and who pays as it sounds expensive.

I object to MM41(0d) to the wording Necessary and proportionate contribution towards an off-site walking and cycle network to the village centre of Send, the Burntcommon Warehouse site and Clandon railway station.

This is just a cash collection for GBC.

There are already footpaths and a cycle lane in place to Send and Ripley.

Access to the warehouse site should be provided by the warehouse owner or developers if that goes ahead for redevelopment. Access is adequate now and has been for years.

Clandon railway station is over a mile away and not many people walk there now so it is doubtful many will in the future as train prices increase and the service is so slow.

The exiting footpaths are narrow with not enough room for cyclists and pedestrians without risk.

The council don’t maintain existing paths properly now so nothing will change.

Cyclists will be in more danger from the increased traffic on the narrow Clandon Road.

Collecting a contribution to fix a problem GBC are making themselves seems idiotic.

I object to MM41(0e) to the wording Necessary and proportionate contribution towards mitigation schemes etc

This is just another cash collection for GBC

There are no details about any proposed mitigation schemes.

The council acknowledges there will be adverse material impacts on communities but wants to collect cash rather than look after the very communities that objected to this development of the countryside.

The council acknowledges there will be an adverse impact to the environment which money can’t fix yet it is willing to take the contributions anyway.

The council acknowledges this impact is far reaching to include Send, West Clandon and Ripley. The impact will be far greater reaching than that when queues on all roads into Guildford and Woking cause havoc. The A3 will be the new rural car park.

I object to MM41(0f) Increase landscaping buffer etc

This paragraph does not really make sense.

If it is acknowledged there is a need to set back any development from the A3 and try to screen the A3 from the houses there is obviously an issue with building in this location.

Landscaping will have no effect on the air pollution on a low-lying site next to one of the busiest roads in Surrey.

It is doubtful that any form of strategic buffer will eliminate noise pollution from the A3 or the development itself to neighbouring properties.

There are not enough significant additional measures to mitigate the visual impact of a development of 550 new dwellings other than do not build them.
Who would take care of this pretty landscape and planting when the developer departs with its profit and who pays.

Attached documents:

Comment: MM9 - LPMM18/89  Respondent: Mr Martin Billard 15601857  Agent:

I object to MM9 para(1)

Other considerations should not include meeting housing targets or financial contributions for CIL or S106 payed to GBC

Attached documents:

Comment: MM27 - LPMM18/4515  Respondent: Ann Watkins 15603361  Agent:


None of these proposals will help an already chaotic traffic problem.

Attached documents:

Comment: MM41 - LPMM18/4512  Respondent: Ann Watkins 15603361  Agent:

MM41. Land at Garlicks Arch. Send Marsh Policy A43.

I objected to the original proposal and now note the amount of homes has Risen from 400 to 550. Surely, this over development, as local services and roads are already at breaking point,

Attached documents:

Comment: MM41 - LPMM18/4516  Respondent: Ann Watkins 15603361  Agent:


None of these proposals will help an already chaotic traffic problem.

Attached documents:

Comment: MM42 - LPMM18/4513  Respondent: Ann Watkins 15603361  Agent:
MM42. Burnt Common. Send Policy A58.

Why so much extra industrial development in a village? This surely means even more traffic - large lorries and vans, besides noise. Surely a village should hope to have some peace and quiet.

Attached documents:

Comment: MM42 - LPMM18/4517  Respondent: Ann Watkins 15603361  Agent:


None of these proposals will help an already chaotic traffic problem.

Attached documents:

Comment: MM44 - LPMM18/4523  Respondent: Ann Watkins 15603361  Agent:

MM44. Land at Alderton's Farm, Send Marsh Road, Policy A63

This is yet another proposal to cause even more overcrowding of Send village.

Attached documents:

Comment: MM48 - LPMM18/4518  Respondent: Ann Watkins 15603361  Agent:


None of these proposals will help an already chaotic traffic problem.

Attached documents:

Comment: MM2 - LPMM18/2796  Respondent: Penelope Gillmore 15607553  Agent:

I would like you to note my following comments as a resident of West Clandon for 14 years.

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine .

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’. Just wishing

1. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways...
England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the
A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This
would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common,
avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of
Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local
Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around
Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to
the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution
is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the
South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic.
Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway).
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph.
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and
parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for
traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that
Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site
behind the station.
4. The sight lines for the exit of the Onslow Arms car park.
5. The narrowness of the road near Summers.
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without
mounting the pavement.
7. The sharp bend near Clandon Regis.
8. The narrowness of the road at the Bull’s Head.
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school.
10. The sharp bend with poor sight lines in either direction at the church.
11. No continuous footpath through the length of the village.
12. The speed of traffic.
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this
requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the
argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much
more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the
town centre and reduced pressure on the Green Belt.
1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Comment: MM2 - LPMM18/2797  Respondent: Penelope Gillmore 15607553  Agent:

2. MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Comment: MM23 - LPMM18/2801  Respondent: Penelope Gillmore 15607553  Agent:
Comment: MM23 - LPMM18/2809  Respondent: Penelope Gillmore 15607553  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/2798  Respondent: Penelope Gillmore 15607553  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM3 - LPMM18/2808  Respondent: Penelope Gillmore 15607553  Agent:

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/2802  Respondent: Penelope Gillmore 15607553  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.
MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

**Comment:** MM32 - LPMM18/2803  **Respondent:** Penelope Gillmore 15607553  **Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

**Comment:** MM33 - LPMM18/2804  **Respondent:** Penelope Gillmore 15607553  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

**Comment:** MM35 - LPMM18/2805  **Respondent:** Penelope Gillmore 15607553  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

**Comment:** MM41 - LPMM18/2806  **Respondent:** Penelope Gillmore 15607553  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment</th>
<th>MM44 - LPMM18/2807</th>
<th>Respondent: Penelope Gillmore 15607553</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM44 The new Green Belt site at <strong>Send</strong> is not justified in view of the revised housing figures.</td>
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<th>Comment</th>
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<th>Respondent: Penelope Gillmore 15607553</th>
<th>Agent:</th>
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<tr>
<td>MM9 In Green Belt, proposed limited <strong>infilling outside identified settlement</strong> boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.</td>
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<th>Comment</th>
<th>MM51 - LPMM18/3494</th>
<th>Respondent: Heather Mason 15608769</th>
<th>Agent:</th>
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<tr>
<td>I am writing to give my firm approval of the modification of Guildford Borough's Local Plan Amendment 1: Horsleys - West Horsley (South) (MM51) map page 84 which will protect the rural character and unspoilt tranquility of the landscape which, as a resident of West Horsley village, I thoroughly enjoy and value as do many visitors, walkers, runners and cyclists.</td>
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<th>Comment</th>
<th>MM13 - LPMM18/5107</th>
<th>Respondent: Elizabeth Maycock 15611361</th>
<th>Agent:</th>
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<tr>
<td>MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing. The GRA adviser suggestion referred to under MM2 above is also relevant here.</td>
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<th>Comment</th>
<th>MM2 - LPMM18/5105</th>
<th>Respondent: Elizabeth Maycock 15611361</th>
<th>Agent:</th>
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</table>
I wish to object to the Local Plan and its Modifications on the basis indicated below.

**MM2** The housing target set out in the Plan is simply wrong on the latest evidence. The public examination should be reopened so that the latest figures and household projections from the Office of National Statistics can be taken into account. These projections give new lower population and household figures, correcting the flaws which previously inflated Guildford's housing figures by overestimating how many students stay and have children after their course finishes.

I understand that Guildford Residents Association has been advised by a leading national expert, who has calculated that a more realistic figure for extra homes is 360 rather than the 672 currently proposed in the Local Plan. This suggests that the present proposed development in the Green Belt simply cannot be justified. This new lower figure would also make it more achievable to bring forward well-planned, sensitively-designed housing in the town centre in a faster timescale than presently proposed.

**MM2** There should be no requirement for Guildford to take Woking's "unmet need" particularly as this will require further green belt release. Presumably, this "unmet need" will also be based on projections now found to be inaccurate on the basis of the latest ONS figures.

The council has not properly followed its own spatial strategy, which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road, Ripley which has not been properly considered.

Attached documents:

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**Comment:** MM23 - LPMM18/5109 **Respondent:** Elizabeth Maycock 15611361 **Agent:**

**MM23** Policy 01 waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes). Development without proper consideration of these factors will lead to development without a social connection to its immediate surroundings or those nearby.

The above is amplified by the fact that strategic sites are to be exempt from design constraints.

There is no evidence that recent case law (such as "People over Wind" case in the European Court of Justice) has been taken into account.

Attached documents:

---

**Comment:** MM3 - LPMM18/5110 **Respondent:** Elizabeth Maycock 15611361 **Agent:**

**S3** The town centre policy is inadequate and, quite apart from comments above under MM2 and MM13, does not address the infrastructure deficit.

Attached documents:
SITE SPECIFIC - A35 - Three Farms Meadows

The addition of land to the south of the appeal site does nothing to mitigate the density issue already much discussed in previous planning appeals as much of the new land added to the site is constrained by the VOR.

Attached documents:

MM41 The Local Plan Transport Strategy relies on inadequate modelling. The delay to the J10 Highways England RIS scheme (of at least two years) will have a knock-on effect on all development that relies on this scheme [e.g. Site A35 - Three Farms Meadows; MM41 site A43 - Garlicks Arch; MM44 - Aldertons Farm].

There is too much reliance on A3 (Guildford) improvements that are beyond the council's control and have no fixed timescale.

Attached documents:

MM9 infilling in and around villages will inevitably result in the weakening of protection of the countryside.

Attached documents:

MM3 New town centre development should avoid impact on surrounding residential areas

Attached documents:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications of the increased developments at Garlick's Arch, Burnt Common, Clockharn and Alderton's have not been properly thought through. The proposed changes to the A3 and Clandon slip roads will not address the problems
created by the extra traffic on top of the usual rush hour Woking commuter traffic congestion, causing increased noise, nitrogen dioxide pollution delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/4652  Respondent: Jackie van Heesewijk 15640897  Agent:

MM41, Land at Garlick's Arch, Send Marsh, Policy A43

I absolutely object to the increase of homes at the Garlick's Arch site. I objected to the homes originally, and now even more so, given the increase from 400 to 550 homes. I feel that the increase of approximately 36% is far too great - the roads are already clogged most of the day and it's difficult to get an appointment at the doctor's. Closing the local school in Ripley was the most ridiculous thing to do and will place an even greater pressure on the village. It's very sad that the 7000 or so objections that were previously made have been ignored.

The site in question is ancient woodland and Green Belt land. It has been used as a legal clay shoot for over twenty years so the land is contaminated with lead shot. It is also subject to frequent flooding.

I feel that the proposed increase of homes constitutes over development and will join up the separate villages of Send and Ripley, which have been known hamlets since the Doomsday Book. The two parishes should remain distinct villages to preserve this ancient special rural area but the proposed development will merge them.

The increase in traffic and people has not been considered in the present infrastructure of the villages, the roads are already so busy. One incident on the A3, M25 or any other major road in the area quickly results in gridlock in the village. That is now, not taking account an increase of approximately 800 extra vehicles caused by the extra housing. And what about schooling, now that our local school has been closed (don't start me on that topic). Our wonderful but underfunded medical centre is already stretched to breaking point.

Attached documents:

Comment: MM41 - LPMM18/4661  Respondent: Jackie van Heesewijk 15640897  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications of the increased developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's have not been properly thought through. The proposed changes to the A3 and Clandon slip roads will not address the problems created by the extra traffic on top of the usual rush hour Woking commuter traffic congestion, causing increased noise, nitrogen dioxide pollution delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/4653  Respondent: Jackie van Heesewijk 15640897  Agent:

MM42, Land at Burnt Common, London Road, Send, Policy A58
I object to the increase proposed, from 7000 to a minimum of 14,800 sq m of industrial and storage. I am disappointed that this has been increased twice, since being deleted from the original 2014 plan. It is by far the largest new industrial allocation in any village in the borough, so why here? There is no need to put new industrial sites in the Green Belt when Slyfield has unused capacity. There are no special circumstances to allow this on Green Belt land, so it contradicts policy MM9. Apparently the Employment Land Needs Assessment showed a reduction in demand for industrial land, so why is this even proposed? This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send, with no proven demand, than any other village. Why can't the industrial space, if really required, be split with other villages, rather than concentrated here? Again, the increase in traffic will be unsustainable, it really doesn't take much for the narrow village roads to get gridlocked. The levels of pollution will increase to intolerable levels.

Attached documents:

Comment: MM42 - LPMM18/4662  Respondent: Jackie van Heesewijk 15640897  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The traffic implications of the increased developments at Garlick's Arch, Burnt Common, Clockbarn and Alderton's have not been properly thought through. The proposed changes to the A3 and Clandon slip roads will not address the problems created by the extra traffic on top of the usual rush hour Woking commuter traffic congestion, causing increased noise, nitrogen dioxide pollution delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/4654  Respondent: Jackie van Heesewijk 15640897  Agent:

MM44, Land at Alderton's Farm, Send Marsh Road, Policy A63

A new site for 120 new homes including some self build. So many new homes proposed for such a small area constitutes extreme over development within this village/parish. Again, this is a Green Belt site with no special circumstances, so it contradicts policy MM9. The additional traffic that this development will create will increase traffic chaos at the Send traffic lights at Mays Corner as well as all surrounding roads. Any development in this area could detract from the heritage buildings at Send Marsh Green which are so beautiful and an important part of the character and history of this area.

With the proposals of increased housing at Garlick's Arch (550), Clockbarn (60) and Winds Ridge this adds 770 houses to the 1700 currently proposed for Send, an increase of 45%. This is undoubtably too much of an increase for our already weak infrastructure to contain. Again, the objections that were previously voiced have been disregarded.

Attached documents:

Comment: MM48 - LPMM18/4664  Respondent: Jackie van Heesewijk 15640897  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy
The traffic implications of the increased developments at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s have not been properly thought through. The proposed changes to the A3 and Clandon slip roads will not address the problems created by the extra traffic on top of the usual rush hour Woking commuter traffic congestion, causing increased noise, nitrogen dioxide pollution delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/4657  Respondent: Jackie van Heesewijk 15640897  Agent:

**MM9 Green Belt policy**

The "modifications” claim to protect the Green Belt, but in very special circumstances GBC can make an exception for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of our lovely village.

Attached documents:

Comment: MM41 - LPMM18/3377  Respondent: Frances Turner 15657057  Agent:

**POLICY A43: LAND AT GARLICK’S ARCH, SEND MARSH/BURNT COMMON AND RIPLEY. MM41**

I object to this increase from 400 to 550 homes, which is without justification. Development on the Green Belt is contrary to Government planning policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. Removing so much green belt land from around Send Marsh is incompatible with the Government’s definition of “sustainable development”. There are no “exceptional circumstances” as required by NPPF paragraphs 79-92 to justify allocating Green Belt land for development. I also object to the increased threat to the loss of Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. This development would also merge the currently separate village settlements of Send and Ripley. This is contrary to the policies for sustainable development in the NPPF which state that “*The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*” (NPPF paragraph 79).

This development proposal is in an unsustainable location because the site is unsuitable due to lack of access to sustainable transport. It does not benefit from a railway station within easy walking distance and bus services are poor. Residents will have few options but to be reliant on private motor vehicles. There is no adequate assessment of the effect of the traffic generated by the 800+ cars which would accompany this development. These additional vehicles would contribute adversely to the already unacceptably high pollution levels generated by the A3, while the A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The development would also place further pressure on stretched medical and school provision, while many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.

Attached documents:

Comment: MM42 - LPMM18/3378  Respondent: Frances Turner 15657057  Agent:
POLICY A58: LAND AROUND BURNT COMMON WAREHOUSE, LONDON ROAD, SEND. MM42

I object to this proposed increase from 7000 to a minimum of 14,800 sq m of industrial and storage. This is the largest industrial allocation in any village within Guildford borough. Removing so much Green Belt land from around Send Marsh is incompatible with the Government’s definition of “sustainable development”. The proposals are contrary to government policy on sustainable development because there is unused land at Slyfield industrial estate, and there are no “exceptional circumstances” as required by NPPF paragraphs 79-92 to justify allocating Green Belt land for this development. Furthermore, there is no adequate assessment of the effect of the additional traffic which would be generated by this development, and which would contribute adversely to the already unacceptably high pollution levels generated by the A3.

Attached documents:

POLICY A63: LAND WEST OF ALDERTON’S FARM, SEND MARSH ROAD, SEND. MM44

I object to this new site for 120 homes within the green belt. Removing so much green belt land from around Send Marsh is incompatible with the Government’s definition of “sustainable development”. There are no “exceptional circumstances” as required by NPPF paragraphs 79-92 to justify allocating Green Belt land for development. There is no adequate assessment of the effect of the additional traffic which would be generated by this development, and the local roads are narrow and inadequate to support the additional traffic which would result.

Attached documents:

Objections to the main modifications to the draft Guildford Borough Council Local Plan 2017

I am writing to object to the following main modifications (MM) following the planning inspector’s report which place additional undue and disproportionate over-development on the village of Send. I understand that as consultation on the local plan is still in progress it will be assessed against the 2012 edition of the government’s National Planning Policy Framework (NPPF) rather than the 2018 revision.

POLICY P2: GREEN BELT. MM9 2c) “ii. Limited infilling may also be appropriate outside the inset settlement boundaries, as designated on the Policies Map, of the following villages where it can be demonstrated that the site should be considered to be within the village...Send...” I object to this modification, which includes Send, as it has no objective basis, but could be abused to allow any development on any Green Belt land around the village. It is contrary to government planning policies for sustainable development in the NPPF which state that “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open” (NPPF paragraph 79). It would also side-step the test for “exceptional circumstances” required by NPPF paragraphs 79-92 to justify allocating Green Belt land for development.

Attached documents:

Other comments - LPMM18/3380  Respondent: Frances Turner 15657057  Agent:
Extra Comment:

It is disheartening to be having to object again and again to these proposals when it seems as if the planning department are merely paying “lip service” to the whole process but have already decided to overrule any local objections regardless of due process and democracy. It is a waste of local borough funds too. In mitigation of planning policy – we do need affordable housing for local people or more social housing to allow families to stay in the same locality – good community relationships are key to change and healthy family/community li

Attached documents:

Comment: MM12 - LPMM18/3549  Respondent: Natural England (Marc Turner) 15661921  Agent:

Planning consultation: Local Plan: Strategy and Sites – Main Modifications 2018
Location: Guildford BC

Thank you for your consultation on the above dated 10 September 2018 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The main modifications have been read while looking at Natural England’s previous advice, which was sent on 12 July 2017, reference 217709. Aspects of the previous correspondence have been included in this letter, if they did not appear in the main modifications draft.

Policy P5: Thames Basin Heaths Special Protection Area

It was advised that under point (3) a separate point should be included to state that the amount of SANG land needed can also depend on the size, scale and proximity of the development to the SPA as well as the number of expected occupants. The 8ha per 1,000 people standard is only the minimum that could be required.

It was advised that Natural England disagrees with paragraph 4.3.51 which should be revised. This paragraph does not appear in the main modifications, so is assumed to have remained the same. Previous correspondence suggests Natural England advise that there is potential for developments under the use class C2 to have a significant impact upon the SPA even if they are not for staff. The main consideration for applications, particularly those including care facilities (in either use class C2 or C3), is the mobility of the residents and therefore the risk that the residents could recreate on the SPA, causing a likely significant effect on the integrity of the site. C1 accommodation could also have a significant effect on the SPA depending on the length of time that people could stay at the facility and whether it could be a person’s fixed address e.g. ‘apart-hotels’. C1 and C2 applications should be assessed on a case by case basis in consultation with Natural England.

Paragraph 4.3.62 does not appear in the main modifications and it was advised that the statement should be revised to state that SAMM contributions are held by Hampshire County Council and that Natural England only act as a host to the project.

Attached documents:

Comment: MM33 - LPMM18/3552  Respondent: Natural England (Marc Turner) 15661921  Agent:
Policy A24: Slyfield Area Regeneration Project, Guildford

This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

Comment: MM35 - LPMM18/3553  Respondent: Natural England (Marc Turner) 15661921  Agent: 

Policy A25: Gosden Hill Farm, Merrow Lane, Guildford

This site includes an area of Registered Common Land. This is covered by the Commons Act 2006 and will have rights of access by the public which must be considered in the proposed use of the site and may also affect the capacity of the proposed SANG area. Guidance on common land is available at https://www.gov.uk/guidance/carrying-out-works-on-common-land. In particular we draw your attention to the Secretary of State’s policy for casework related to common land and town or village greens in England and the requirement, in the case of deregistration of common land, for the provision of replacement land. Natural England is a specified consultee under the Commons Act 2006 and will respond to any consultations in line with the above guidance.

This site is adjacent to and includes ancient woodland within the site. Any direct or indirect impacts on this site should be avoided or mitigated.

Comment: MM36 - LPMM18/3554  Respondent: Natural England (Marc Turner) 15661921  Agent: 

Policy A26: Blackwell Farm, Hogs Back, Guildford

It was previously advised that this site is within the setting of the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

It is also noted that the main modifications suggest an increase in square footage for the proposed development.

Comment: MM37 - LPMM18/3563  Respondent: Natural England (Marc Turner) 15661921  Agent: 

Proposals brought forwards with the main modifications.

A26a Land for access road between A31 Farnham Road and Blackwell Farm, Hogs Back, Guildford.
This site proposal is set near or within Surrey Hills Area of Outstanding Natural Beauty, has ancient woodland nearby, and has the potential for air quality issues. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership.

Attached documents:

<table>
<thead>
<tr>
<th>Comment: MM38</th>
<th>LPMM18/3556</th>
<th>Respondent: Natural England (Marc Turner) 15661921</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Policy A29: Land to the south and east of Ash and Tongham</strong></td>
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<tr>
<td>This site is in very close proximity to the Thames Basin Heaths SPA and therefore must provide an appropriate suite of mitigation to ensure that impacts upon the site are avoided. This is likely to include provision of SANG above the minimum standard of 8 ha per 1,000 persons.</td>
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<td>This site allocation is in very close proximity to Thursley, Ash, Pirbright and Chobham SAC and Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.</td>
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<tr>
<th>Comment: MM39</th>
<th>LPMM18/3565</th>
<th>Respondent: Natural England (Marc Turner) 15661921</th>
<th>Agent:</th>
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<tr>
<td><strong>A61 Land at Aaron’s Hill, Godalming</strong></td>
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<td>It is also close to Charterhouse to Easing Site of Special Scientific Interest, Thursley Ash Pirbright and Chobham Special Area of Conservation and Wealden Special Protection Area.</td>
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<td>As this site is in very close proximity to the Wealden SPA it therefore must provide an appropriate suite of mitigation to ensure that impacts upon the site are avoided. This is likely to include provision of SANG above the minimum standard of 8 ha per 1,000 persons. All dwellings must also contribute to SAMM. Any direct or indirect impacts on this site should also be avoided or mitigated.</td>
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<tr>
<th>Comment: MM41</th>
<th>LPMM18/3559</th>
<th>Respondent: Natural England (Marc Turner) 15661921</th>
<th>Agent:</th>
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</thead>
</table>
| **Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley**  
**Policy A43: Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley**  
**Policy A58: Land around Burnt Common warehouse, London Road, Send** |
<p>| It was previously advised that these sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated. It is noted that policy a43 has an increase of proposed housing developments from 400 to 500 dwellings. Policy 58 also has an increase in land use proposed. |
| Attached documents: |</p>
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<tr>
<th>Comment: MM42 - LPMM18/3561</th>
<th>Respondent: Natural England (Marc Turner) 15661921</th>
<th>Agent:</th>
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</table>
| **Policy A39:** Land near Horsley railway station, Ockham Road North, East Horsley  
**Policy A43:** Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley  
**Policy A58:** Land around Burnt Common warehouse, London Road, Send |
| It was previously advised that these sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated. It is noted that policy A43 has an increase of proposed housing developments from 400 to 500 dwellings. Policy 58 also has an increase in land use proposed. |
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<th>Comment: Other comments - LPMM18/3550</th>
<th>Respondent: Natural England (Marc Turner) 15661921</th>
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<tr>
<td><strong>Policy A22:</strong> Land North of Keens Lane, Guildford</td>
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| Part of this site is within 400m of the Thames Basin Heaths SPA. Whilst the policy makes reference to a care home being allocated within the 400m exclusion zone, it must be ensured that future residents will be too informed and/or have reduced mobility making it unlikely that they will be able to recreate on the SPA.  
This policy also states that 150 residential units are proposed. It must be ensured that these units are located outside of the 400m exclusion zone and must provide an appropriate suite of mitigation to ensure that impacts upon the SPA are avoided.  
This site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated. |
| Attached documents: |

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<tr>
<th>Comment: Other comments - LPMM18/3551</th>
<th>Respondent: Natural England (Marc Turner) 15661921</th>
<th>Agent:</th>
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<tr>
<td><strong>Policy A23:</strong> Land North of Salt Box Road, Guildford</td>
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</table>
| This site is within 400m of the Thames Basin Heaths SPA and whilst allocated for a new burial ground, potential impacts on the SPA must still be considered especially given that a new car park and site access is proposed. We would expect measures to be put in place to ensure that the car park is not available to the general public.  
The site and the car park must not link to the Public Rights of Way which lead towards the SPA.  
This site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated. |
| Attached documents: |

| Comment: Other comments - LPMM18/3555 | Respondent: Natural England (Marc Turner) 15661921 | Agent: |
Policy A27: Warren Farm, White Lane, Ash Green

This site is within close proximity to the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

Attached documents:

Comment: Other comments - LPMM18/3557  Respondent: Natural England (Marc Turner) 15661921  Agent:

Policy A32: Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford

Policy A33: The University of Law, Guildford

These sites are within the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.

Attached documents:

Comment: Other comments - LPMM18/3558  Respondent: Natural England (Marc Turner) 15661921  Agent:

Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley
Policy A43: Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley
Policy A58: Land around Burnt Common warehouse, London Road, Send

It was previously advised that these sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated. It is noted that policy a43 has an increase of proposed housing developments from 400 to 500 dwellings. Policy 58 also has an increase in land use proposed.

Attached documents:

Comment: MM2 - LPMM18/5259  Respondent: Simon Jefferies 15673185  Agent:

I object to the modifications which propose development in the green belt.
I also object to the widening of inserting policy to include sites “which are considered to be in the village”. If this policy is adopted then the number of windfalls must be increased significantly. I object to the use of statistics only “if they support the argument”. Specifically that the latest household formation statistics have not been taken into account.

I also consider that the traffic model is wildly inaccurate and therefore unreliable.

I note that advocate general Kolkutt’s clarification on European case law has also not been taken into account and this risks further expense for the council which has not taken the necessary action.

I support the representation written by Richard Harwood QC on behalf of the Wisley action group.

I call for the EIP to be reopened.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5689</th>
<th>Respondent: Susan Wade 15693185</th>
<th>Agent:</th>
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<tr>
<td>I am writing you in relation to the Draft Local Plan for Guildford.</td>
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<td>MM2 - Recently there has been a reduction in ONS Population Forecasts for Guildford. Since the Inspector’s Examination significantly revised population forecasts (downwards) for Guildford have been released from the ONS.</td>
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<td>These figures mean that the total number of new homes required over the period of the Plan (2015-2034) should be considerably reduced. GRA expert Neil MacDonald has already demonstrated that 360 new homes per year would support the ambitious economic growth proposed by the Inspector. Therefore “exceptional circumstances” to allow the building of new homes in the Green Belt, are clearly not present. If this lower figure was accepted and more homes were built on brownfield sites, then the need to build on Green Belt land would be removed (Policy S2).</td>
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<td>Also, it is I believe inappropriate for Guildford to sacrifice Green Belt area to provide homes for Woking when Guildford is more constrained.</td>
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<th>Comment: MM3 - LPMM18/5690</th>
<th>Respondent: Susan Wade 15693185</th>
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<td>In addition, the lack of an Adequate Town-Centre Masterplan (MM3 – Policy S3) means that there would have been identified more Brownfield sites for town centre housing, thus reducing the need for excessive Green Belt development.</td>
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<td>Lack of Adequate Transport Infrastructure to support the plan in general but in particular to the three large Strategic Sites (Blackwell Farm, Gosden Hill and Wisley airfield) would all result in additional traffic using the A3, which is already at breaking point (e.g. the A3 regularly jams and results in substantial traffic flows through the town centre and residential</td>
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**1765 of 2554**
urban area – the M25 / A3 improvements will only make matters worse). Such large-scale development sites should therefore not be included in the Local Plan until a substantial capacity increase to the existing transport infrastructure, notably the A3 through Guildford, is agreed. (Policy ID1) Also it is essential to resolve town centre traffic issues before implementing housing and population growth in the town.

I ask therefore that the Local Plan Examination be re-opened, in order to consider the consequences of the revised population forecasts.

**Attached documents:**

### Comment: MM13 - LPMM18/4543  **Respondent:** Graham Vickery  15703937  **Agent:**

Element MM13 - Takes no account of the evolution / revolution in high street retailing in that constant growth is assumed when the threats of ‘online’ buying habits are plain to see (retail chain closures). Such that the retail allocation could be better used providing sustainable housing.

**Attached documents:**

### Comment: MM2 - LPMM18/4540  **Respondent:** Graham Vickery  15703937  **Agent:**

Element MM2 - The housing target: Is now wrong and should be reviewed in the light of the latest ONS population and household formation statistics that presents far different growth prospects than those used by GBC

**Attached documents:**

### Comment: MM23 - LPMM18/4542  **Respondent:** Graham Vickery  15703937  **Agent:**

Element MM23 - Underestimates the social dimensions of sustainability - far too optimistic around walking distances and pedestrian and cycling routes.

**Attached documents:**

### Comment: MM41 - LPMM18/4541  **Respondent:** Graham Vickery  15703937  **Agent:**

Element MM41 - The long term transport strategy uses a model that is inadequate because it does not recognise the delay in the M25/J10/A3 project by at least 2 years, which will impact all development relying on the project. Notably site A35-TFM

**Attached documents:**
Element MM9- “Infilling” in and around Ockham and West Horsley will lead to a weakening of the protection of the countryside.

Attached documents:

Comment: MM23 - LPMM18/6263  Respondent: Highways England (Patrick Blake) 15746081  Agent:

We look forward to working with all parties which include Guildford Borough Council and Surrey County Council to develop Masterplans for the strategic sites. This work will include establishing the deliverability of the identified transport mitigation packages that directly or indirectly relate to the SRN which is set out within the individual associated policies. This will likely be informed by outputs from subsequent updates to Surrey County Council’s SINTRAM model and also be used to inform updates to the Infrastructure Delivery Plan supporting the Local Plan. We further look forward to working towards and agreeing an updated Statement of Common Ground or similar with Guildford Borough Council.

Attached documents:

Comment: MM27 - LPMM18/4311  Respondent: Highways England (Patrick Blake) 15746081  Agent:

**MM27**

An improvement of the A3 through Guildford was included in the first Road Investment Strategy (RIS1) announced in 2015 as a scheme to be developed for potential construction during Road Period 2, subject to value for money and availability of funding. Highways England is presently undertaking feasibility studies and initial analysis and appraisal in order to assess the viability of potential options for improvement of the A3 at Guildford. There are complex challenges to address and we are currently in stage 0 (pre-project/strategy, shaping and prioritisation) of HE’s Project Control Framework. This work is ongoing.

The next Road Investment Strategy (RIS2) will be for the period 2020-2025. The Secretary of State for Transport will decide on the components of RIS 2, such as allocating budget and naming specific schemes. Highways England is currently working with DfT to advise the Secretary of State on potential investment portfolios. The Government is expected to publish the next Road Investment Strategy in summer 2019, at which point commitments to a number of schemes will be made. Until this point, we will not be in a position to make any commitments to the construction of a scheme on the A3 at Guildford. Further, it should be noted that delivery of any proposal named in RIS2 will still require successful completion of the necessary statutory planning process and the continued development of business cases to ensure the demonstration of value for money.

It is understood how the amended Policy ID2 will, if required could trigger a review of the Local Plan.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support proposals that consider sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN. It is vital that the deliverability of any required infrastructure that proposed growth is reliant upon is fully assessed.

We look forward to working with all parties which include Guildford Borough Council and Surrey County Council to develop Masterplans for the strategic sites. This work will include establishing the deliverability of the identified transport mitigation packages that directly or indirectly relate to the SRN which is set out within the individual associated
This will likely be informed by outputs from subsequent updates to Surrey County Council’s SINTRAM model and also be used to inform updates to the Infrastructure Delivery Plan supporting the Local Plan. We further look forward to working towards and agreeing an updated Statement of Common Ground or similar with Guildford Borough Council.

Attached documents:

Comment: MM46 - LPMM18/4310 Respondent: Highways England (Patrick Blake) 15746081 Agent:

Thank you for the opportunity to comment on the Main Modifications of the Guildford Local Plan Strategy and Sites Consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M25.

MM46

I refer you to the Statement of Common Ground (SoCG) between Highways England and Guildford Borough Council agreed on 5 June 2018. 3.3 of the SoCG states:

“It is agreed that if the growth trajectory was to change, the Submission Local Plan supporting evidence would need to be updated to consider both the individual and cumulative impact from growth to establish if any further mitigation/infrastructure is required to enable delivery.”

It is noted that it is proposed in the current consultation to develop a flat profile of 672 homes to be delivered annually during the plan period, which appears a significant increase from previous understood housing delivery trajectories in the early years of the plan (up to 2024). It is understood that neither the Strategic Highways Assessment or Mott Macdonald A3 Study has not been updated, in turn informing the Council’s Infrastructure Delivery Plan setting out what infrastructure is necessary to facilitate growth. If any of this identified infrastructure directly or indirectly relates to the SRN, we recommend early dialogue with Highways England. This is essential to demonstrate the proposed growth is deliverable in transport terms. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within Guildford Borough, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

At this point in time we are unable to confirm if the proposed increase in planned housing trajectory up to 2024 is deliverable without adversely impacting the safe and efficient operation of the A3.

Attached documents:

Comment: Other comments - LPMM18/6265 Respondent: Highways England (Patrick Blake) 15746081 Agent:

Thank you for the opportunity to comment on the Main Modifications of the Guildford Local Plan Strategy and Sites Consultation.
Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M25.

Attached documents:

**Comment**: MM39 - LPMM18/4306  **Respondent**: Ashill Land Ltd (Ashill Land Ltd) 15805921  **Agent**: CBRE (Adam Kindred)

## MAIN MODIFICATIONS CONSULTATION ON GUILDFORD BOROUGH COUNCIL

CBRE Limited (Planning) (CBRE) acts as planning consultants to Ashill in respect of the land north of Aarons Hill, Godalming ("the site" hereafter). CBRE is instructed by Ashill to submit representations to the Main Modifications Consultation on the Guildford Borough Council (GBC) Local Plan.

Ashill welcomes the identification of the Land at Aarons Hill (Draft Site 61) by GBC as providing part of the solution to meeting the requirement for an additional 550 homes in the first five years of the plan. Within this response, we have set out further details to confirm the deliverability of the site within the first five years of the GBC plan along with further details as to why the allocation is sound.

The proposed allocation is sound in accordance with Paragraph 182 of the NPPF. As detailed further below, the identification of the site represents a positive response to the identified need, it is justified when considered against the reasonable alternatives, effective in dealing with a cross-boundary site and consistent with national policy.

**Consistent with National Policy - Achieving Sustainable Development**

Paragraph 8 of the NPPF is clear that to achieve sustainable development, 'economic, social and environmental gains should be simultaneously sought through the planning system.' For the reasons set out below, Draft Site 61 ‘Land at Aarons Hill’ achieves benefits across these criteria and is consistent with national policy.

- **Social Role** – the site is adjacent to a wider area that is designated as a Priority Neighbourhood for Regeneration. The priorities are to drive improvements in the measures of the Index of Multiple Deprivation (Income Deprivation, Employment Deprivation, Education, Skills and Training Deprivation, Health Deprivation and Disability, Crime, Barriers to Housing and Services, Living Environment Deprivation).

The proposed allocation will assist in supporting the vitality and viability of the local primary school which has been presented with the threat of closure. The direct and indirect role of the allocation in helping deliver wider educational improvements in this area represents a clear social gain for the allocation. As evidenced in the current live application for the land in Waverley (REF: WA/2018/1239), the planning application is supported by both the Diocese of Guildford and the Green Oak Primary School.

Development of the site could result in significant localised improvements across a range of IoD measures, in particular the delivery of new affordable housing and provision of open space contributing to the living environment, access to homes, and people’s ability to lead healthier lifestyles. Finally, the scheme will deliver flexible community space as part of its provision. Whilst this could be used for local community events, there may also be the scope to include drop in medical surgeries and health awareness sessions.

The social benefits associated with the allocation is reflected in section 9.4.2 of the Sustainability Appraisal (2018) in which it is stated:
‘the allocation should help to secure the future of the nearby primary school, and it is also noted that the Aaron’s Hill area is somewhat ‘relatively deprived’ in the Waverley/Guildford context.’

- Environmental Role – it is important that the environmental opportunities associated with the allocation are considered as a whole. As per the requirements of Draft Allocation 61, development of the site will include the provision of a SANG. A planning application for SANG (REF: 18/P/01958) has been submitted to GBC for approval. The land identified is adjacent to a Biodiversity Opportunity Area (BOA). Consistent with the objectives of Policy ID4, the habitat creation on the SANG will result in biodiversity gains on the site and allow for an extension of the Wealden Greensands BOA. In addition, consistent with Paragraph 81 of the NPPF the provision of SANG in this location will provide opportunities for beneficial access to the Green Belt for recreation.

- Economic Role – the allocation will deliver much needed homes to GBC which will help in seeking to rebalance the current affordability pressures and provide homes for people to be able to live and work in the local area. The site is located in close proximity to Godalming Train Station which provides direct connections to Guildford.

Justified – Consideration Against Reasonable Alternatives

The Sustainability Appraisal Addendum (2018) includes a comparison of the site against other reasonable alternative options, namely Clandon Golf (300 Homes) and Liddington Hall (300 Homes).

Relationship with the A3

As discussed during the Examination in Public (EiP) in seeking to identify additional sites, it is important that this does not result in further pressure to the A3. In this respect the allocation at Aarons Hill is justified when considered against the reasonable alternatives. As noted in Paragraph 9.16.1 of the Sustainability Statement Addendum (2018):

The conclusion is that ‘the largest of the allocations (Aaron’s Hill, Godalming; 200 homes) is supported, as there is good access from the site to Godalming town centre and train station, and there is also a good bus service available in close proximity…There is also the matter of seeking to avoid worsening of existing traffic congestion, and in this respect it is notable that the Aaron’s Hill site is supported as: ‘Vehicle trips to/from Aarons Hill to/from the south (Portsmouth direction) will not pass through the Guildford section of the A3. Those travelling to/from the north towards London and the M25 motorway will use the Guildford section of the A3; however, they will be on the mainline carriageway through the A3 Guildford section and would not be leaving or joining the A3 Guildford at its junction.’

Highways England in their response to the adjacent application in Waverley (REF: WA/2018/1239) have confirmed that the development of 262 units on site would not present issues to the strategic road network. An additional 200 dwellings should not change that conclusion and therefore the scheme is not reliant on the proposed works to the A3.

Green Belt

It is relevant to note that the potential for the Land at Aaron’s Hill to be released from the Green Belt was acknowledged in the GBC Green Belt Study (2014). Whilst the site formed part of a much wider area (F18) that was not considered appropriate for release from the Green Belt, the Council’s evidence base acknowledged that:

‘The borough boundary is generally physically separated from the settlement boundary within land parcel F18 therefore any development would not be continuous with the settlement boundary, unless future development was brought forward to the west of Godalming within Waverley District (our emphasis).’

The release of the site from the Green Belt represents an opportunity to establish a more permanent and enduring boundary. In this regard, the conclusions reached by the Inspector in respect of Aarons Hill at Waverley would apply equally to the situation in GBC. As stated:
'The site is suitable for removal from the Green Belt: it is not of particularly high landscape quality, being flat and rather featureless, the existing urban edge is rather hard and the site would present the opportunity of establishing a better edge to the built-up area and a better-defined Green Belt boundary.'

(Waverley Inspectors Report, Paragraph 11)

Drawing upon the conclusions reached above, in qualitative terms the Green Belt at Aarons Hill differs from those considered as part of the reasonable alternatives at Clandon and Liddington. Furthermore, the Aarons Hill allocation offers the opportunity to establish a more robust and enduring Green Belt boundary. The need to establish a more robust and enduring Green Belt boundary in this location is further increased following the draft allocation of the WBC site for residential development.

Social Benefits
As set out above, the allocation of the site is justified in allowing more than just housing and thus results in improvements across social, economic and environmental factors. The opportunity to respond to the identified regeneration needs of the area is a significant consideration when considered against the reasonable alternatives.

Effective – Joined Up Approach

Paragraph 182 of the NPPF states that to be effective ‘the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.’ As detailed in their response to the Regulation 19 Consultation, WBC wrote to GBC to recommend that the GBC part of the Aarons Hill site be allocated for development.

The site at Aarons Hill is unique with respect to the way in which the administrative boundary crosses the site. The proposed allocation of the site in the GBC Plan is an effective response to a cross-boundary matter.

Positively Prepared – Response to Identified Housing Need

The identification of the Draft Allocation represents a positively prepared approach to meeting housing need within the housing market area (including unmet need from Woking). In respect of the land at Aarons Hill, and particularly the conclusions reached in respect of the Waverley Inspector’s Report, it is apparent that the release of the site is reasonable (in not being a high quality Green Belt site) and is consistent with the principle of achieving sustainable development in generating improvements across social, environmental and economic factors.

Following the EiP new ONS Housing Projection figures have been released by ONS which suggest lower household formation rates compared to the figures released in 2016. It is important to consider the publication of this information in the context of the advice note prepared by ONS themselves (October 2018). As stated:

‘Although the latest household projections are lower than the previously published projections, this does not directly mean that fewer houses are needed in the future than thought. This is because the projections are based on recent actual numbers of households and are not adjusted to take account of where homes have been needed in recent years but have not been available. Therefore, if more homes are built, the increased availability of homes may result in more households forming. The opposite is also true – if fewer homes are built then fewer households are able to form.’

Site Deliverability

The deliverability of the site within the early years of the plan is a key requirement for the allocation.

In considering development of the site, the administrative boundary represents a somewhat arbitrary line of separation, following no clear ‘on the ground’ distinction. Accordingly, the technical work undertaken to date has been on a site wide basis including among other things topographical survey work, ground investigations, ecology and tree surveys, archaeological survey, foul and surface water drainage assessment, service capacity checks/diversions, highways assessment, and agricultural land assessment. With regards to agricultural land assessment the land is of relatively low quality and requires significant manual irrigation to make any crop viable, and there is no farming or crop related constraints that would prevent development commencing. Ashill therefore possess a detailed body of technical evidence.
that could be used in support of an early planning application submission, subject to the support of officers.

In the table below, we have included an overview of factors relevant for consideration for the deliverability of the site and a response to each of these.

3 Page 96 - Guildford borough Submission Local Plan Consultation Statement 2017 (December 2017)
4 https://blog.ons.gov.uk/2018/10/19/what-our-household-projections-really-show/

## Site Deliverability

<table>
<thead>
<tr>
<th>THEME</th>
<th>RESPONSE</th>
</tr>
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<tbody>
<tr>
<td>Strategic Highways Network</td>
<td>As set out above, the development of the site will not result in adverse impacts to the A3. Highways England’s response to the WBC application has confirmed that no strategic issues present from the development of 262 homes on site. A further 200 dwellings should not change that conclusion.</td>
</tr>
<tr>
<td>Local Highways Network</td>
<td>Discussions have been held with Surrey County Council (SCC) as local highway authority regarding the deliverability of 200 dwellings on the site, including consideration of the cumulative impact with the 262 dwellings currently proposed on the adjacent area within Waverley Borough. The discussions have been informed by the detailed traffic modelling exercise undertaken and agreed for the Waverley scheme (REF: WA/2018/1239) and SCC agrees that the cumulative traffic impacts are capable of being appropriately mitigated such that traffic impact should not be a barrier to prevent the developments coming forward. There is a significant level of comfort on this point – the level of detail discussed with SCC has been much greater than typically provided when promoting sites through the local plan process.</td>
</tr>
<tr>
<td>SANG</td>
<td>A planning application for SANG has been submitted to GBC. The application has been informed by pre-application engagement with Natural England, following a site visit, who have confirmed that the site identified can meeting their requirements for SANG land. Natural England have also confirmed that the proximity of the site to the A3 would not preclude its uses as a SANG. The land identified for use as SANG is owned by the same landowner as the Draft Allocation.</td>
</tr>
<tr>
<td>Land Contamination</td>
<td>The Environmental Pollution Control Officer has responded to the Waverley application to confirm the acceptability of the land contamination report submitted. No pre-commencement works are required in respect of land contamination. The ground investigation covered the whole site providing certainty for a GBC scheme.</td>
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</table>
| Utilities                     | Through the preparation and post-submission discussions on the WBC scheme, engagement has been had with all utilities providers. Thames Water are currently undertaking the necessary modelling work for the site. It is also pertinent to note that the response of Thames Water to the WBC Local Plan Part II includes a response from Thames Water to confirm that only minor infrastructure upgrades are required. Further details are provided below.  

A preliminary assessment has been carried out by SSE (April 2018) for supplying the site based upon a predicted electrical demand. Advice is given that, to cope with this demand, on site sub-stations will be required. This can be incorporated into the scheme.  

Thames Water has advised that the existing sewer network can accommodate the predicted flows from the proposed housing, provided a minimum of two separate outfalls are used. In respect of
potable water, Thames Water have made that comment and we’re working with them to provide clarity.

<table>
<thead>
<tr>
<th>Archaeology</th>
<th>Engagement with SCC has confirmed that on the basis of the evidence submitted and the historic use of the site the potential for significant archaeological assets on the site is low.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access</td>
<td>In addition to numerous pedestrian/cyclist accesses, including a direct link to the railway station and town centre, the principal vehicular access is proposed via Eashing Lane. An arrangement that complies with design standards and that offers sufficient capacity is readily achievable. Discussions have been held with SCC and they confirm that an appropriate site access is achievable.</td>
</tr>
<tr>
<td>Ecology</td>
<td>An ecology assessment has been undertaken for the totality of the site. Given the previous intensive agricultural use of the site there is limited biodiversity interest on site, with the more ecologically sensitive areas being located in the WBC part of the site near the Valley Field. Relevant survey work has been undertaken for the totality of the site and thus there are no seasonal time constraints to the development. The scope of additional survey work required in respect of dormice has been agreed with Natural England.</td>
</tr>
<tr>
<td>Masterplan Design</td>
<td>Given the wider site interest and potential, the progression and evolution of the design of the 262 WBC scheme has always been progressed on the basis of ensuring that it did not preclude development coming forward on the GBC side of the site, should GBC release this land from the Green Belt. As part of this process a holistic scheme was presented to Design South East (March 2018) and has received their endorsement, establishing clear principles and a framework for how the site could be developed. We have enclosed a layout showing how a GBC would integrate with the WBC scheme.</td>
</tr>
</tbody>
</table>

**Discussions with Delivery Partner**

Footnote 11 of the NPPF states ‘to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.’

Godalming is a hugely desirable place to live and when coupled with the fact that it is relatively constrained by environmental and landscape designations, reduces the development opportunities and therefore makes any large scale housing developments very attractive to the housebuilder market.

In this regard Ashill have engaged the services of JLL to assist them in finding the best development partner to bring forward this exciting opportunity. JLL have prepared a letter which is attached for your information and self-explanatory.

Ashill’s expertise lies in obtaining detailed planning permissions which are attractive, desirable but ultimately easy to build and this will certainly be our approach on this site. Ashill have already prepared an indicative scheme which shows how 200 homes could be delivered on this site (see attached), albeit it is subject to detailed scrutiny and further discussion with your development management colleagues. Given the background work that has already been undertaken, if Ashill obtain comfort from GBC that the site is going to be formally allocated for development then they will engage our full consultant team to prepare a detailed planning application which can be submitted relatively quickly.

Whilst the application is being considered Ashill can begin the process of obtaining a development partner so that the chosen party will be ready to commence development as soon as practically possible. Given the proceeding and the
relatively unconstrained nature of the site from a construction point of view we believe that the following timetable is realistic:

- Construction to commence 3 months from receipt of planning permission;
- First units ready for occupation 9 months from commencement;
- Show home ready 6 months after commencement;
- Completion of construction with 36 months of commencement;
- Sales rate expected 5 per month, per sales outlet (one sales outlet in GBC and one sales outlet in WBC);
- On GBC 200 scheme – 120 are private – this means 24 months of Sales; and
- ON WBC scheme 183 are private – this means 36 months of sale

The site is deliverable within the first five years of the plan and will directly address the soundness issues identified through the summer hearing sessions. The allocation of the site represents an appropriate solution to the identified issues of soundness when considered in isolation and also against the reasonable alternatives. With the pre-submission version of the Waverley Local Plan Part II document including a residential allocation for 260, allocation of the site in the GBC would result in an enhanced Green Belt boundary in this location and complement the wider development.

As discussed, the allocation presents an opportunity to achieve benefits across all three measures of sustainability. Thus, whilst the site allocation responds to housing need in the first instance, it also delivers benefits across other measures. The proposed Main Modification is sound.

We trust that the above comments are helpful in the context of the advancing the Local Plan. We would be grateful if you could confirm receipt of these representations. Should you wish to discuss this matter in more detail, please do not hesitate to contact me.

for appendix see attachment

Attached documents:  [Ashill Rep_Redacted.pdf](#) (400 KB)
ii) Necessary and proportionate contribution towards an off site walking and cycle network between the village centre of Send, the Burnt Common Warehouse site and Clandon railway station.

iii) Necessary and proportionate contribution towards mitigation schemes to address the otherwise adverse material impacts on communities and the environment, including in Send, West Clandon and Ripley.

iv) Increased landscaped buffer,strategic planting with frontage development set back from the A3 with significant additional measures to mitigate the visual impact of development in this location.

1.3 Further assessments of the proposed modified version of Policy A58 have now been undertaken by RGP in terms of its deliverability in light of the assessments carried out to date and in the context of the latest position with regard to existing and planned transport infrastructure improvements. In summary, RGP conclude that the proposed modified version of Policy A58 is fully deliverable in transport terms, either with or without the identified wider improvements to the A3 / M25 strategic road network.

2 BACKGROUND

2.1 RGP has worked with the Newship Group since 2015, providing transport and highway advice pertaining to the promotion and bringing forward the site allocation for future development. RGP has produced three previous Technical Notes in relation to the site, the second of which (WHYG/16/3206/TN02) was submitted as part of GBC’s Summer 2017 consultation on the Local Plan during June and July last year.

2.2 TN02 focussed on the deliverability of the site including the points of access and the potential impact of traffic generated by 7,000sqm of B1c/B2/B8 at local junctions in Send, including a series of junction capacity assessment in two future scenarios in 2022. The junctions assessed were:

i) B2215 London Road / A247 Send Barns Lane / B2215 Portsmouth Road / A247 Clandon Road – Roundabout Junction (‘Junctions 8’ assessment);

ii) Send Hill / A247 Send Road / Send Marsh Road / A247 Send Barns Lane Signal Controlled Crossroads Junction (LinSig assessment); and

iii) Ripley By-Pass (A3 southbound on-slip road) / A247 Clandon Road Priority junction (‘Junctions 8’ assessment).

2.3 The conclusion of the modelling exercise (using Junctions 8 and LinSig modelling software) was that the development proposals would have a negligible impact on the existing junctions in 2022 compared with the baseline position.

2.4 Further junction modelling exercises have now been undertaken based on the proposed modification of Policy A58 (14,800 sq m of commercial floor space) and the associated increases in traffic generation compared to the previously assessed 7,000 sq m. This assessment also included an uplifted baseline assessment year of 2023.

2.5 The findings of this further junction modelling assessments show that the traffic associated with 14,800 sq m would continue to have a negligible impact on the existing junctions compared to the 2023 baseline position and the junctions would continue to operate within their theoretical capacity limits.

2.6 As was concluded from RGP’s TN02 report from 2017 (based on 7,000 sq m), the Burnt Common Roundabout (east of the site) was identified to be subject to the greatest impact from the proposals. Therefore, the previously identified scheme to increase capacity at the roundabout by amending the kerbline on A247 Send Barns Lane to achieve a dedicated lane for left-turning vehicles has again been assessed in capacity terms for the ‘With Development’ scenario based on 14,800 sq m of floor area. The findings of this assessment show that these improvements would provide a delay saving to drivers of over 20 seconds on this arm and would reduce maximum levels of queuing on the arm by 6 vehicles. Again, the scheme would deliver a material improvement to the overall operation of the roundabout when compared to the baseline 2023 scenario.

2.7 The transport infrastructure requirements of Policy A58 from the Schedule of Proposed Main Modifications to the Submission Local plan (2017) document do not specifically relate to vehicular impacts at local, or wider, sections of the
transport network. Notwithstanding this, should it be required, the funding and implementation of such improvements to the Burnt Common Roundabout (secured through Section 106 / 278 Agreements as appropriate) could form part of a future planning application at the Burnt Common Nurseries site. These improvements would be proportionate and cost-effective. They are fully deliverable within public highway land with little, or no, delay. Appropriate contributions could also be provided as part of any planning approval to deliver the various transport improvements as set out in the proposed wording of Policy A58.

2.8 The findings of any associated Transport Assessment accompanying a future planning application would thoroughly assess the relative transport impacts and would identify appropriate mitigation as necessary.

3 LOCAL TRANSPORT INFRASTRUCTURE

3.1 During the Local Plan preparation period there has been considerable discussion relating to two new north-facing slip roads onto the A3 at Burnt Common referred to in the GBC Submission Local Plan as Policy A43a. The Former Wisley Airfield is included within the GBC Submission Local Plan 2017 as Policy A35 and the slip roads are noted in point 4 of the infrastructure requirements for this Policy. No alterations to this are proposed within the Main Modifications document.

3.2 The Wisley Airfield scheme promoted by the developer, Wisley Property Investments Ltd, proposed a 2,068 home settlement along with a range of community facilities and a new primary and secondary school. The outline planning application was refused by GBC in April 2016 and was the subject of a planning appeal in Autumn 2017. The Appeal was dismissed in June 2018.

3.3 In a Statement produced by Guildford Borough Council published on Friday 15th June 2018, the Council states that the Inspector’s decision does not affect the proposal to retain the Wisley Airfield site as an allocation in the Submission Local Plan as the points which the Inspector has raised (primarily harm to the Green Belt) are assessed differently during the preparation of a Local Plan to those during a planning application/appeal. Additionally, GBC appended the position statement released by Highways England and Wisley Property Investments Ltd on 11th June 2018 to their statement which stated that Highways England was ready to withdraw its formal objection to the scheme, therefore the previous concerns expressed by the Inspector and Secretary of State on the grounds of highway safety are capable of being resolved.

3.4 As set out in the Statement of Common Ground (July 2018) between Guildford Borough Council and the promoter of site allocation A43 (Garlick’s Arch) and A58 (the subject site at Burnt Common) an interim transport mitigation scheme could be implemented in Ripley which ensures that the residual cumulative impacts of Allocations A58 and A43 is not severe in the period prior to the completion of the A3 new slip roads (and the Highways England M25 J10/A3 scheme).

3.5 Notwithstanding the above, the proposed A3 north facing slip roads are not considered necessary to facilitate the allocation and future development of the Burnt Common Nurseries site (Policy A58), including the proposed modification to 14,800 sq m. Despite the Wisley Airfield decision and matters relating to the delivery of the strategic transport improvements at the A3 / M25, RGP is keen to highlight that the Burnt Common Nurseries site (Policy A58), including the proposed modification to 14,800 sq m, can operate within the remit of the existing highway network.

3.6 Moreover, cost-effective improvements to the Burnt Common Roundabout have been identified which would deliver an overall improvement to the operation of the roundabout. Alternatively, or alongside this, appropriate contributions for transport improvements could be made as part of a future planning consent, as identified in the Transport Strategy of the proposed Main Modifications document.

Sustainable Transport

3.7 The Schedule of Proposed Main Modifications to the Submission Local plan (2017) document includes a transport strategy for Policy A58, which focusses on accessibility by non-car modes. This includes matters relating to the permeability of the site itself, as well as on the wider transport network, including between the village of Send, the subject Burnt Common Warehouse site and Clandon railway station.
3.8 With reference to this identified transport strategy, as detailed within RGP’s TN02 document (July 2017) RGP have already undertaken assessments in terms of the accessibility of this site for all users, full details of which would be provided as part of a Transport Assessment to accompany a future planning application. As well as ensuring that appropriate access for vehicular users can be provided, RGP have identified an appropriate pedestrian / cyclist access strategy into / out of the site from London Road.

3.9 In addition to the above, a number of wider sustainable transport improvements have already been identified by RGP for London Road, including the provision of a new 3-metre wide shared cycleway / footway adjacent to the site on the southern side of London Road. Also identified are improvements such as the widening of existing sections of cycleway / footway at the Burnt Common roundabout. These measures could be included within a package of Section 278 works associated with the planning application, or through appropriate contributions as per the identified transport strategy.

3.10 Further contributions would also be provided towards bus services and improvements to non-car accessibility to the centre of Send and Clandon rail station as part of other planned developments locally. These improvements would also be beneficial to users of the Burnt Common Nurseries site.

4 SUMMARY AND CONCLUSIONS

4.1 In summary, this note concludes the following:

i) Suitable vehicular access could be achieved to the site as well as delivering sustainable infrastructure improvements for all users of the site;

ii) The site could deliver the proposed modification to 14,800 sq m of floor space, without having a severe impact on the local highway network. Full assessments and associated mitigation would be detailed within a Transport Assessment accompanying a future planning application;

iii) Improvements to the Burnt Common roundabout could be implemented as part of the Burnt Common Nurseries scheme and would have an overall net benefit to the operation of this roundabout;

iv) The Burnt Common Nurseries scheme (Policy A58), including the proposed modification to 14,800 sq m, could be delivered either with, or without, the planned new Burnt Common slip roads at the A3 (Policy A43a); and

v) The scheme would deliver all of the necessary transport improvements as identified in the proposed transport strategy for Policy A58. These improvements could be delivered through S278 works as part of the scheme, or through financial contributions as appropriate.
with other key sustainability criteria, including its flexibility to come forward early in the Plan period without requiring the construction of significant infrastructure upfront.

As a result, the Local Planning Authority has proposed to increase the allocation at Burnt Common Nurseries to 14,800sqm floorspace to be provided within the Plan period to meet the identified need, with additional land being brought forward if required, as identified through an update to the ELNA. Since the Examination in Public where the units were identified as vacant, two of the units have since been let and occupied and an offer has been received for the third and final unit.

The allocation of the site as set out in the Main Modifications to the Plan represents the expansion of an existing lawful industrial site that can be delivered early in the Plan period. As described in the enclosed statement from RGP (highways consultants), the development is not reliant on the provision of new sliproads onto and off the A3 at Burnt Common to mitigate the transport impacts. Local highway mitigation would be provided, which is found to have an overall net benefit to the operation of the Burnt Common roundabout.

We write to affirm our assessment that the proposed development would provide choice and competition in the market for employment land, meet an identified need at an early stage within the Plan period and provide flexibility to meet a higher need for industrial floorspace (Use Class B1, B2, B8), should the need arise, as identified through updates to the ELNA.

All of the above would be met on a site previously used for commercial development in a location that is attractive to the market, due to its proximity and accessibility to the strategic road network, Guildford and Woking. The development of the site would have a minimal impact on the environment and appropriate mitigation can be provided to minimise the landscape/visual impact, whilst providing opportunities for employment creation close to existing urban areas.

**Highways and transport**

Further junction modelling assessments show that the traffic associated with 14,800sqm would continue to have a negligible impact on the existing junctions compared to the 2023 baseline position and the junctions would continue to operate within their theoretical capacity limits.

Development of the site would not have a severe impact on the highway network and, in combination with other allocations in the emerging Local Plan, can contribute to the improvement of existing sustainable modes of transport.

The (London Rd/ Send Barns Lane/ Clandon Road) junction can be upgraded to mitigate for the transport impacts of the development, including the provision of a left-turn lane from London Road to Send Barns Lane.

In addition, in the period prior to the completion of the A3 new slip roads (and the Highways England M25 J10/ A3 scheme), an interim transport mitigation scheme can be implemented which ensures that the residual cumulative impacts of Allocations A58 (Burnt Common Nurseries) and A43 (Garlick’s Arch) are not severe. This is set out in an agreed Statement of Common Ground (July 2018), prepared for the Guildford Local Plan Examination in Public.

**Choice and competition of sites**

Regarding choice and competition, St. Modwen has recently implemented phase 5 (the final phase) of the planning permission for Use Class B1, B2 and B8 floorspace at Henley Business Park. This provides a large amount of modern, flexible commercial floorspace to the market. The site is less accessible to the strategic road network than the Burnt Common Nurseries site, however St. Modwen has already had interest in some of the units and an offer made on two units.

The emerging Plan also identifies eleven existing strategic employment estates throughout the Borough. These vary in size from 1.6ha. (Cathedral Hill Industrial Estate) to 38ha. (Slyfield Industrial Estate) and location (i.e. within the urban area of Guildford, on the edge of the town and in the rural area). These provide a range of size, type and location of employment floorspace, which provides a wide choice and facilitates competition in the local market.

Development of the Burnt Common Nurseries site would also increase choice in the area by location. The site provides a convenient location for the villages in the north of the Borough and an alternative to Merrow Lane and Slyfield industrial estate. This demonstrably increases choice and competition.
The employment development at Burnt Common Nurseries would be constructed in phases, with each phase comprising a range of flexible unit sizes. A number of smaller units would be provided, acting as incubator units. As a result, a number of units would come forward at the same time, increasing the amount, type and size of units available to the market.

The new units are likely to better meet the needs of a number of occupiers from within the local area (Guildford, Waverley and Woking), than their current accommodation. As incentives are offered to prospective occupiers of the new units, this would increase choice and competition at the time the units are brought to the market and any move from within the property market area will free up space currently occupied for others wishing to move into the area, thereby maintaining that choice and competition in the market.

Conclusion

We support the Main Modification allocation of the Burnt Common Nurseries site for a minimum of 14,800sqm of B1, B2 and B8 floorspace at an early stage in the Plan period, with additional floorspace being brought to the market by other strategic sites later in the Plan period.

The landowner remains committed to developing the site in accordance with the allocation, which would serve to increase choice and competition in the Borough. The impact on the local area would be negligible and contained. As identified by RGP, there would not be a severe impact on the local highway network and improvements to the Burnt Common roundabout could be implemented that would have an overall net benefit to the operation of this roundabout.

Please do not hesitate to contact me should you require any further information.

Attached documents:
The proposed site allocation at Aaron's Hill extends an already sprawling settlement further into the countryside. The site itself is located some distance from the centre of Godalming and, as a consequence of the manner in which Godalming has grown, is effectively located within a small settlement between Godalming and Milford. Located at the top of a hill in open landscape, the site is visually prominent and lacks a clearly defensible boundary, presenting issues of future sprawl into open countryside far removed from the centre of the settlement. Additionally, Eashing Road to the west of the site is inherently rural in character. Development of the site will have a significant urbanising effect that will irreversibly change the character and rural setting to the north of Godalming.

As previously highlighted, Obsidian support the principle of amending the submitted local plan to introduce new sites that are deliverable within the first five years of the Plan period and are sustainable. The site at Pond Farm represents a more sustainable extension to an existing settlement than that at Aaron's Hill, whilst having a lesser visual and landscape impact and demonstrating a clearly defensible boundary. The site was a draft allocation in the emerging local plan (at Regulation 18 stage) which demonstrates the Council's agreement that the site is appropriate for development. Given the uplift in necessary housing supply and the need for sites in the early years of the plan, in addition to no technical justification regarding why the site should not be allocated for residential development, it is considered that the site at Pond Farm should be included as an allocation for residential development in the local plan. Inclusion of the site at Aaron's Hill in the local plan whilst the site at Pond Farm remains unallocated demonstrates the absence of a clear and coherent spatial strategy and is simply unjustified.

We trust our comments will be given full and proper consideration and we would be happy to discuss the site at Pond Farm in further detail should that be helpful.

Attached documents: [Obsidian Rep_Redacted.pdf](Obsidian REP_Redacted.pdf) (563 KB)
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Attached documents:  
- Obsidian Rep_Redacted.pdf (563 KB)
POLICY A62: Hornhatch Farm, land adjoining New Road, Chilworth

Proposed Early Housing development of 80 new houses

This Green Belt site consists of agricultural land within the area of Shalford Parish Council and close to the boundary of Waverley District. The proposed housing site would be visible from the nationally important countryside of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGLV) at the Chantries. It forms part of the Tillingbourne Greensand Valley which is described in the Guildford Landscape Character Assessment (GLCA) as a valley which provides a transport corridor with the railway and the A248 running along the flood plain from East to West through the largely linear development of the village of Chilworth. The GLCA which was published in 2007 refers to "continuing traffic congestion" and the need to "retain the character of the individual settlements avoiding merging these through dense linear development along roads." Anyone familiar with Chilworth will be well aware of the congestion at Rice's Corner of the junction to the West of the village of the A248 and the B2128 from Wonersh which occurs regularly at peak traffic periods through the day.

An application made for 30 houses to be built at this site in 2013 was refused largely on the grounds of unsustainability. It must be pointed out that both bus and rail services to and from Chilworth offer a very limited service. Most residents of the village rely on the car for transport. Walking to the station from the new larger development proposed would take 20 minutes each morning and evening as it is located at the other end of the village, or even a longer time to Shalford station which is still further away. There is no adequate parking at Chilworth station.

Owing to the traffic bottleneck which forms at Rice's Corner and the subsequent congestion on the A248 to Guildford, many car drivers seek to use Blacksmith and Halfpenny Lanes as a quicker "rat run" route to reach the county town each morning and evening. This causes a safety concern and objection in the Chilworth community at Blacksmith Lane within the area of St Martha's PC and for residents within the adjoining GBC Holy Trinity ward to the North. These rural single track lanes are categorised as "D" because they are so narrow and sinuous, and Halfpenny Lane is sunken for much of its length. A weight restriction applies to vehicles over 7.5 tons which is not always observed. The GCLA refers to the desirability of restricting traffic flow along sunken lanes of this type which run up to the North from the Tillingbourne Valley. It is worth noting that the North Downs Way National Trail crosses Halfpenny Lane near a particularly dangerous corner. An extract from the GCLA states "Conserve the rural roads and sunken lanes minimising small-scale incremental change such as signage, fencing or improvements to the road network which would change their character".

Going back to before 2004 the Chilworth community were assured by the Surrey County Council (SCC) that a proposal was being considered to put in a roundabout at Rice's Corner junction between the A248 and the B2128 to reduce traffic congestion and to allow priority to be given to traffic on the A248. In June 2004 the Local Committee considered this proposal from the Tyting Society but it was rejected as too expensive owing to the need to relocate a number of utility and other services at Rice's Corner. The minor road improvements made subsequently did not significantly reduce the traffic congestion problem which has increased steadily to this day. The current prospect of 80 additional new houses being built at Hornhatch Farm is daunting when one considers the car traffic that this would generate. The community will suffer if this proposal proceeds further against the united opposition of the PCs at Albury, Blackheath, St Martha's, Shalford, and Wonersh. Moreover, we have to recognise that the housing development at Cranleigh and Dunsfold, which appears to have been approved by Waverley Council, will in addition cause further major congestion problems on all the relevant A roads and force additional traffic onto minor country roads and lanes that are already unable to cope with the vehicles that seek ways around trouble spots.

It should therefore not surprise anyone if there is objection to this development proposal which seems to have been added at a late stage and has little to endorse it.

Attached documents:

Comment: MM41 - LPMM18/3475  Respondent: Colin Sweby 17159393  Agent:
I wish to object to modifications to the local plan as presented below?

MM41 Garlicks Arch, Policy A43

The significant proposed increase in housing is excessive. This will lead to extra traffic movements on an infrastructure which is already at capacity. As a resident of Send Marsh Road I currently experience queues of 50 to 70 yards most mornings with vehicles attempting to turn right or left onto the B2215.

The local Doctors surgery facilities are overloaded, there being difficulty in obtaining an appointment. Also it is unlikely that there will be sufficient increase in educational facilities to accommodate the increase in pupil numbers. I do not agree that pupils should be transported "out of area" as this policy is disruptive and not in the best interests of the children.

Has consideration been made of the effect of development on effluent treatment at Ripley Sewage works? Thus will these works be able to comply with the requirements of the Water Framework Directive?

The site has previously been subject to flooding, with areas used for shooting. Hence the Desk Study and environmental audit of the site will probably indicate that significant remedial works in respect of heavy metal contamination and drainage works will be required. Have the financial implications of these additional works been considered?

The site lies within Green Belt and includes ancient woodland, thus it should not be developed. Also there is a small but viable population of bats living in Send Marsh. Has the environmental audit considered whether Garlicks Arch comprises the habitat or roosting areas of these bats? The area currently acts as an environmental "buffer" between the A3 Truck Road and local residents in respect of noise and other forms of pollution. The development of the site will exacerbate these problems as well as increasing them as a result of use age after any proposed development.

Attached documents:

Comment: MM42 - LPMM18/3476  Respondent: Colin Sweby 17159393  Agent:

MM42; Burnt Common, Policy A58

The proposed increase in industrial units etc is excessive, given the location of the site and the capacity at Send Business Centre. Also the Slyfield complex has capacity and has been specifically developed for this type of development.

The site lies in Green Belt, so the proposals contradict MM9.

The proposed development will have environmental consequences, note comments in respect of MM41; Garlicks Arch, above, with regard to noise environmental contamination and the Water Framework Directive.

Attached documents:

Comment: MM44 - LPMM18/3477  Respondent: Colin Sweby 17159393  Agent:

MM44; Aldertons Farm, Policy A63

This site has been re-inserted into the local plan with no justification.

The site lies within the green belt, thus development contradicts MM9
The infrastructure and local services are not sufficient to accommodate the effects of development. Refer to notes about traffic congestion, capacity of medical and educational other facilities presented under MM41; Garlicks Arch.

It is evident that controlled structured development can bring benefits to rural areas. However, the current proposals for MM41, MM42 and MM44, if implemented as proposed will have the cumulative effect of reducing the Send/Ripley area to an urbanized extension of Guildford & Woking with any of the infrastructure to sustain it.

Attached documents:

**Comment:** MM41 - LPMM18/1477  **Respondent:** Mr (Mr Mark Gurdon) 17161889  **Agent:**

I object in the strongest possible terms to this proposal for a number of reasons. I do not understand why the previous thousands of objections have been ignored and instead the proposal is to INCREASE the size of the development. The roads in the area simply cannot cope with the increased traffic flow, it is already at breaking point at some times of the day. I know that local schools and medical centres are all full at the moment, so this development with have a huge detrimental effect on those services.

Attached documents:

**Comment:** MM42 - LPMM18/1479  **Respondent:** Mr (Mr Mark Gurdon) 17161889  **Agent:**

This proposal is for an absurd amount of industrial and storage space given that there is so much surplus space in the area which is unoccupied, specifically Slyfield. The roads in the area already cope with huge amount of lorries and large commercial vehicles, so many of which end up parked on the access road to this site. This will increase traffic flow to unsustainable levels. Why do we need to put industrial sites in the Green Belt? Totally unnecessary in my view.

Attached documents:

**Comment:** MM44 - LPMM18/1489  **Respondent:** Mr (Mr Mark Gurdon) 17161889  **Agent:**

This site was removed from the local plan because of the large number of objections and for some reason has appeared again. With the Garlicks Arch proposal and the other proposal the infrastructure of send cannot possibly cope with this enormous number of additional house and all the traffic that entails. I object to this as i have the others in the strongest possible terms.

Attached documents:

**Comment:** MM13 - LPMM18/4668  **Respondent:** David Roberts 17164033  **Agent:**
The projected need for retail space is vastly inflated and should be severely cut to make room for urban homes. The projections presented, which might have seemed credible five years ago, seem to ignore how high streets are evolving with retail bankruptcies, the rise of online shopping etc.

Comment: MM2 - LPMM18/4663  Respondent: David Roberts 17164033  Agent: 

Guildford Local Plan: Strategy and Sites - Main Modifications 2018: consultation response

I object to the identification of the HMA with the tri-borough area of Woking/Guildford/Waverley. This is arbitrary and has never been justified in real-world terms of where residents live, work, shop, commute and study. The need to include Woking’s unmet housing need is therefore based on a false premise enshrined in the SHMA.

It is factually untrue that the OAN has been based on “the latest 2018-based population projections.” September 2018 figures suggest 301 dpa, or just over 5,700 for the plan period. Taking account of the commitments, unallocated LAA sites and windfalls listed, green field development in the protected Green Belt is plainly unnecessary to meet the OAN, especially as new Policy S3 now requires urban brownfield be given priority. No “exceptional circumstances”, as required by the NPPF, have been advanced for any Green Belt development or for “insetting” most of the borough’s villages.

To meet this reduced OAN, the balance of urban development should be shifted radically away from the dying retail sector towards building homes, in line with government policy, uplifting the Guildford Town Centre figure considerably. Promoting the soft option of building in the Green Belt will only disincentivise developers from tackling the much-needed regeneration of central Guildford, directly conflicting with Policy S3.

GBC have claimed that the new ONS figures are inapplicable because the submitted local plan pre-dates the government’s new standard method for calculating housing need. This is splitting hairs. The “Objectively Assessed Need” should be what it says it is – objective. The plan should be based on the best and latest evidence available and needs to adapt in line with the facts.

Comment: MM23 - LPMM18/4669  Respondent: David Roberts 17164033  Agent: 

The changes to Policy DI water down some vital social requirements, set out in national policy, that aim to make development sustainable. Provisions on walking distances and cycle routes and on large developments of over 25 units, for instance, have been deleted and replaced with less specific text that gives a freer hand to developers to get away with socially unsustainable building.

Similarly, the deletion of Policy D4 is not justified as it met the soundness test.
MM3

Policy S3 needs to be stronger all round. Most of the borough’s population live, and want to live, in the Guildford urban area. Urban regeneration, not car-dependent Green Belt housing, should therefore be the centrepiece of the plan. This would be more consistent with national policy and GBC’s own spacial strategy.

The current wording evades several major issues and is too open to loose interpretation in years to come. It needs -

- explicitly to prioritise residential over retail (see above).
- to make plain that the town’s character, including “important views”, can only be protected with a presumption that height will be limited (depending on exact location) to about 4-6 storeys.
- to make more explicit the link between giving “priority for pedestrians and cyclists over motor vehicles” and more realistic, higher housing densities that incentivise walking and cycling, rather than low-rise, suburban-type homes in the town centre with gardens and garages. All this is do-able without compromising character, as London has shown.
- needs to highlight the important role town-centre development can have in kick-starting and front-loading the whole plan, boosting housing numbers in the early years as government policy requires, leveraging GBC’s comparative advantage (relative to greenfield development) as an urban landlord.

Attached documents:

MM7

The viability exception (2) is too permissive. It is open to abuse by developers and should be deleted to protect the countryside.

Attached documents:

MM9

Development in the Green Belt should be restricted in accordance with the NPPF, full stop. Instead, this policy appears to be to seek out and broaden loopholes in Green Belt protections beyond the exceptional circumstances permitted in the NPPF.

With its tortured and ambiguous wording, MM9 adds dangerous layers of challengeable interpretation to national policy that only confuse what is and is not permitted.

The repeated phrases under MM9 (1), for example, appear to go round in circles and are impossible to follow. Under “limited infilling” (2)c(i)-(iii) subjectivity reigns. It could be made a little clearer by deleting “should be considered to be” by “is” in each case. Many villages are highly diffuse or leggy in shape, so any room for confusion about what is “within the village” needs to be restricted.
MM9’s biggest defect, however, is the absence of any positive defence of the Green Belt, despite this covering 81% of the borough’s area. The plan is widely seen by residents as declaring war on the countryside by “insetting” most of the borough’s villages, extending settlement boundaries, removing SNCI protections and prioritising greenfield housing estates over urban regeneration. As currently worded, MM9 risks upsetting the difficult balance between protection and development set out in national policy. Insetting and settlement boundary extension on this major scale is unnecessary and amounts to a general pre-determination in favour of future planning applications. MM9 should not pre-judge these and the relevant maps at Appendix H should be removed.

Attached documents:

Comment: MM27 - LPMM18/222  Respondent: Laura Frankland 17178113  Agent:

MM9 Green Belt policy and MM27 MM42 MM48 Transport Strategy

The Green Belt should be protected and preserved for future generations. Wild life and walkers alike need our greenbelt areas and over development of our villages devastating the rurality of the area. I do not wish to live in a town, choked by increased volume of traffic with reduced places to enjoy nature, peace and a walk with my family and dogs.

Attached documents:

Comment: MM41 - LPMM18/217  Respondent: Laura Frankland 17178113  Agent:

As relatively new resident to Send having moved from West Byfleet due to over development, I wish to strongly object to the following:

MM41 Land at Garlicks Arch, Send Marsh

This development will increase the local housing and traffic considerably and excessively. It is Green Belt land which should be protected and preserved and will join Ripley and Send and constitute over development putting a strain on local facilities.

Attached documents:

Comment: MM42 - LPMM18/218  Respondent: Laura Frankland 17178113  Agent:

MM42 Land at Burnt Common, London Road, Send

This development seems to me unnecessary considering there is unused capacity at Slyfield. It is again Green Belt land and would put unnecessary strain on the local roads

MM9 Green Belt policy and MM27 MM42 MM48 Transport Strategy

The Green Belt should be protected and preserved for future generations. Wild life and walkers alike need our greenbelt areas and over development of our villages devastating the rurality of the area. I do not wish to live in a town, choked by increased volume of traffic with reduced places to enjoy nature, peace and a walk with my family and dogs.
Comment: MM44 - LPMM18/220  Respondent: Laura Frankland 17178113  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road

Send is a village and should remain one. Another Green Belt site with no special circumstances therefore contradicting policy MM9. The additional traffic will increase the pressure on local roads and it will detract from the heritage buildings at Send Marsh Green.

Attached documents:

Comment: MM48 - LPMM18/224  Respondent: Laura Frankland 17178113  Agent:

MM9 Green Belt policy and  MM27 MM42 MM48 Transport Strategy

The Green Belt should be protected and preserved for future generations. Wild life and walkers alike need our greenbelt areas and over development of our villages devastating the rurality of the area. I do not wish to live in a town, choked by increased volume of traffic with reduced places to enjoy nature, peace and a walk with my family and dogs.

Attached documents:

Comment: MM9 - LPMM18/221  Respondent: Laura Frankland 17178113  Agent:

MM9 Green Belt policy and  MM27 MM42 MM48 Transport Strategy

The Green Belt should be protected and preserved for future generations. Wild life and walkers alike need our greenbelt areas and over development of our villages devastating the rurality of the area. I do not wish to live in a town, choked by increased volume of traffic with reduced places to enjoy nature, peace and a walk with my family and dogs.

Attached documents:

Comment: MM43 - LPMM18/2963  Respondent: Peter Dunt 17204673  Agent:

This comment refers to MM43 A62 - Land at Hornhatch Farm, adjoining New Road, Chilworth, where the proposal is to build 80 homes.

You will see from my address that we live very close by in Great Tangley; we have lived here for over 30 years. We travel regularly on the B2128 at all times of the day, and the volume of traffic at Rice’s Corner is already at saturation. At peak times, it can take 20 minutes to travel one mile from Rice’s Corner into Shalford. Access onto the B2128 from our lane (Great Tangley) has also become increasingly difficult over recent years.
I am sure you are also aware that Rice’s Corner is often the scene of accidents.

It is therefore my considered opinion that building 80 homes at Hornhatch Farm will make access onto New Road and the B2128 unsustainable and dangerous.

In addition, local schools and doctors surgeries are already full; what plans would there be to increase capacity?

I therefore object to the proposal.

Attached documents:

Comment: MM41 - LPMM18/3490  Respondent: Madeleine Davis 17205121  Agent:

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

I strongly object to the plan to build 550 homes on this land.

The increased number of houses from the original plan is excessive and it would appear that the objections to the previous lower number have been ignored.

This area is in the Green Belt and has ancient woodland.

The two pretty individual villages of Send and Ripley will be joined up to make one large urban area. Village life for the inhabitants will be badly affected.

One of only two primary schools in the area has closed this year. Where is it suggested that the influx of children moving into Ripley will be schooled?

The traffic at the junctions of Send Marsh Road and Send Barns Lane is horrendous at peak times. I suggest someone from the Planning Department should come and experience this.

Attached documents:

Comment: MM42 - LPMM18/3491  Respondent: Madeleine Davis 17205121  Agent:

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

I strongly object to the increase to 14,800 sq metres of industrial and storage

This was deleted from the 2014 plan, but has now been reinstated at twice the size.

There is no need whatever for additional industrial allocation in this area. There are unused sites at Slyfield and unused office space in Guildford which could be put to good use, if required.

This would also add to the gridlocking of the already busy roads in the area.

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<th>Respondent: Madeleine Davis 17205121</th>
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<tbody>
<tr>
<td><strong>MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63</strong></td>
<td>I strongly object the building of 120 homes on this site.</td>
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<tr>
<td>This is Green Belt land. Send Marsh is a unique area, with heritage buildings around Send Marsh Green.</td>
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<td>There have already been too many houses built in Send Marsh, with people cashing in on selling off part of their gardens.</td>
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<td>It will cease to be a small village, with a close community and become part of a big urban sprawl.</td>
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<td>Ripley School closed this year and there is only Send School in the area. This will be unable to cope with the increased number of children.</td>
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<td>The medical centre in Send Barns Lane is already under extreme pressure. They will not be able to cope with an increase in population.</td>
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<td>At peak times the roads in the area are heavily congested, making it difficult for people to get to work on time. A significant increase in the number of cars will impact on this.</td>
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<td>I hope my objections will be taken into consideration. Generally the increase of 770 houses is far too great for the infrastructure.</td>
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<tr>
<td><strong>MM41 Land at Garlicks Arch, Send Marsh, Policy A43</strong></td>
<td>I object to this modification increasing the number of homes from 400 to 550. This 37% increase</td>
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<td>- is far too great</td>
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<td>- will overwhelm Primary School provision</td>
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<td>- will put great strain on GP services</td>
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<td>- mean hundreds of extra cars will make adjacent roads very congested</td>
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<td>- contributes to joining up Send and Ripley, meaning over development.</td>
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<td><strong>MM42 Land at Burnt Common, London Road, Send, Policy A58</strong></td>
<td>I object to the more than doubling of the area for industrial and storage use to a minimum of 14,800sq. m.</td>
<td></td>
</tr>
</tbody>
</table>

1790 of 2554
Slyfield has unused capacity so there is no need to put industrial use on the Green Belt when no special circumstances exist, so that Policy MM9 is contradicted.

This village is being asked to accommodate the largest, by a long way, new industrial allocation in any village in the borough, with no proven demand.

Local roads are unsuited to an increase in heavy traffic.

Pollution levels are already high and will be increased.

Attached documents:

**Comment: MM44 - LPMM18/460**  
**Respondent:** Dorothy Ann Sprigings 17205249  
**Agent:**

**MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63:** I object to the new site for 120 homes.

This, together with the additions at Garlicks Arch (550), Clockbarn (60), Winds Ridge (40) makes a 45% increase those in Send, which the infrastructure cannot bear, and is disproportionate.

It is a Green Belt site with no special circumstances, so contradicts Policy MM9.

Attached documents:

**Comment: MM2 - LPMM18/1039**  
**Respondent:** Ian William Groden 17206177  
**Agent:**

**MM2 and S2 Planning for the Borough—our spatial development strategy**

- Does not the latest forecast by the Office of National Statistics, which slashes its forecast for population growth in the Borough by 40%, mean that the Borough’s housing needs are far below your proposed figures and should be reduced?
- Reportedly also a respected consultancy has given a similarly reduced figure.
- I also note the reported comment that Guildford Council housing needs, appropriately revised, could be met on existing brownfield sites within the town without touching the Green Belt. If this is true, will a reassessment be made to prove that all Green Belt developments cannot be met from existing brownfield sites?

Attached documents:

**Comment: MM27 - LPMM18/1044**  
**Respondent:** Ian William Groden 17206177  
**Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

- I would respectfully suggest that, although individual site allocations may in the outcome be judged by the Council to be without severe impact in the Strategic Road Network, my concern throughout has been for the traffic implications, primarily for Burnt Common Roundabout itself, as well as its converging roads including
the road through Send, from the **combination** of extremely large developments at Wisley, Gosden Hill, Garlick’s Arch, commercial development at Burnt Common and the new north-facing sliproads.

- All will individually lead to new or changed traffic patterns with substantially increased volumes, congestion, noise, and fumes but the combined impact at Burnt Common roundabout merits your utmost confidence that it works without extreme consequences, particularly with the increases at Garlick’s Arch (MM41) and the commercial development at MM42.
- I have mentioned that the increased Garlick’s Arch will still create traffic via the roundabout to Send and Woking.
- In addition, even if the link road through Garlick’s Arch proves sufficient to divert southbound and eastbound traffic (from the Wisley development and Newark Lane), increased numbers from the Wisley development could choose to turn right at the Burnt Common roundabout and take a route to Woking and beyond, which is less tortuous than via Newark Lane. Importantly, traffic coming off the M25 and A3 North could also choose this route (particularly heavy vehicles?). In the same way the Gosden Hill development could lead to larger numbers heading to Woking from the south on the A3.
- The very fact that Guildford’s development figures could now include numbers to make up for Woking’s housing needs surely suggests there will be related increased movement that way.
- The vehicle figures could be in thousands through this small roundabout which will be the crunch point.
- I note that the statistics in response to the Inspector’s query 11.37 re the road through Send are shown in terms of annual average daily traffic and annual average weekday traffic.
- Have GBC projected all the above possible movements, including of course the additions at MM41, MM42 and MM44, to reflect scenarios of future peak hour travel, at Burnt Common roundabout and its feeder roads? It is at these times that the most impact will be felt by the most people in terms of queuing and emissions and local inconvenience and it is this which requires the most attention.

Attached documents:

**Comment:** MM41 - LPMM18/1041  **Respondent:** Ian William Groden 17206177  **Agent:**

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

- The proposed increase in units (some 37%) is excessive for this site- in seeming disregard for the number of objections raised about the original proposed size of this development.
- Oa and Ob (should that read “Burnt Common Roundabout”? under Transport Strategy seem welcome but, together with Oe, clearly acknowledge the adverse material impact of the site. Substantially increased road vehicle numbers will result from this development – now further increased. The enhancement of a through road would not, however, reduce the number of vehicles using Burnt Common Roundabout, Send Barns Lane etc specifically due to movement to local schooling/ shops and the route to Woking for jobs and leisure or shopping.
- The ability of schools and medical facilities to cope with the now increased housing is also of deep concern.
- It represents yet more disproportionate development of sites in Send and in the vicinity of Send.

Attached documents:

**Comment:** MM41 - LPMM18/1045  **Respondent:** Ian William Groden 17206177  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

- I would respectfully suggest that, although individual site allocations may in the outcome be judged by the Council to be without severe impact in the Strategic Road Network, my concern throughout has been for the
traffic implications, primarily for Burnt Common Roundabout itself, as well as its converging roads including the road through Send, from the combination of extremely large developments at Wisley, Gosden Hill, Garlick’s Arch, commercial development at Burnt Common and the new north-facing sliproads.

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Attached documents:

Comment: MM42 - LPMM18/1042  Respondent: Ian William Groden 17206177  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

- I believe this site was previously deleted from the 2014 plan but has been subsequently reintroduced, this time doubling to a large area, with the potential for further Industrial floorspace in the future if required.
- The Transport Strategy recognises the likely adverse material impact on the community and environment in Send, West Clandon and Ripley. The mitigation schemes will not alter the fact that larger numbers of heavy vehicles will now be using Burnt Common roundabout and surrounding roads with impact on local communities and infrastructure.
- It is, I understand, by far the largest new industrial allocation in any village in the borough and I cannot see special circumstances for it in the green belt, particularly as Slyfield has unused capacity.
- Does the Employment Land Needs Assessment show a reduction in demand for industrial land? If so, why this development here with such an increase?

Attached documents:

Comment: MM42 - LPMM18/1046  Respondent: Ian William Groden 17206177  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
I would respectfully suggest that, although individual site allocations may in the outcome be judged by the Council to be without severe impact in the Strategic Road Network, my concern throughout has been for the traffic implications, primarily for Burnt Common Roundabout itself, as well as its converging roads including the road through Send, from the combination of extremely large developments at Wisley, Gosden Hill, Garlick’s Arch, commercial development at Burnt Common and the new north-facing sliproads.

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Attached documents:

Comment: MM44 - LPMM18/1043  Respondent: Ian William Groden 17206177  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, PolicyA63

- Deleted from an earlier draft (there were objections to the site) this has been re-inserted at the public examination in July and will mean additional traffic at Send Crossroads and add to the traffic on local roads.
- With Garlick’s Arch (550), Clockbarn (60), Wind’s Rush (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. Is this fair compared to other communities in the Borough?

Attached documents:

Comment: MM48 - LPMM18/1047  Respondent: Ian William Groden 17206177  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

- I would respectfully suggest that, although individual site allocations may in the outcome be judged by the Council to be without severe impact in the Strategic Road Network, my concern throughout has been for the traffic implications, primarily for Burnt Common Roundabout itself, as well as its converging roads including
the road through Send, from the combination of extremely large developments at Wisley, Gosden Hill, Garlick’s Arch, commercial development at Burnt Common and the new north-facing sliproads.

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- Have GBC projected all the above possible movements, including of course the additions at MM41, MM42 and MM44I, to reflect scenarios of future peak hour travel, at Burnt Common roundabout and its feeder roads? It is at these times that the most impact will be felt by the most people in terms of queuing and emissions and local inconvenience and it is this which requires the most attention.

Attached documents:

**Comment:** MM9 - LPMM18/1040  **Respondent:** Ian William Groden 17206177  **Agent:**

**MM9 Green Belt Policy**

- The modification in MM9 makes an exception for limited infilling outside the identified settlement where it can be demonstrated that the site should be considered to be within the village. This creates uncertainty and the threat of yet more development on existing Green Belt with impact on Send.

Attached documents:

**Comment:** MM41 - LPMM18/4584  **Respondent:** Jenna Crombie 17206209  **Agent:**

**MM41 Land at Garlick’s Arch (Send and Lovelace) intended development of 400 homes increased to 550.**

Attached documents:

**Comment:** MM42 - LPMM18/4583  **Respondent:** Jenna Crombie 17206209  **Agent:**
I am writing to record my objection to the latest draft of Guildford Borough Council’s Local Plan.

I have responded previously to an older version of the plan (unique ID number [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]) highlighting my concerns about the disproportionately high levels of development intended in and around Send and Send Marsh.

On reading the revised plan, I am extremely concerned and disappointed to note that it now shows an increase rather than decrease in intended development in the areas in and around Send.

Specific concerns relate to:
MM42 with the intended site allocation increased from a minimum of 7,000 sq m up to 14,800sq m for industrial use.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM44 - LPMM18/4585</th>
<th>Respondent: Jenna Crombie 17206209</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM44 Land west of Alderton’s Farm (Send) intended development now for 120 homes.</td>
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<tr>
<td>As a resident on Send Road (A247) I am, unfortunately, aware of the high levels of congestion already experienced through the village and have concerns regarding the resulting noise and air pollution. This pollution is exacerbated by the increase in HGV traffic through the village. All of the above will only worsen if the plans set out within the Local Plan go ahead, with some of the mitigating actions e.g. increasing the numbers of buses through the village appearing naively optimistic and wholly inadequate.</td>
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<td>The plan continues to disproportionately affect Send and its surrounding areas, impacts negatively on protected green belt land, and will put unacceptable pressure on the existing infrastructure with intended mitigating activity inadequate.</td>
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<tr>
<td>I hope that these comments will be taken in to account alongside the numerous other objections and that further modifications can be made to the plan to ensure development requirements are spread evenly across the borough – sharing both the opportunities and the burdens of the plan across all residents within the borough.</td>
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<td><strong>Attached documents:</strong></td>
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<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/1430</th>
<th>Respondent: Bob McShee 17225281</th>
<th>Agent: 1796 of 2554</th>
</tr>
</thead>
<tbody>
<tr>
<td>I make the following comments:</td>
<td></td>
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<tr>
<td>1. The housing need figure should use the latest household formation rates and not the 2014 figure.</td>
<td></td>
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<tr>
<td>2. The Town Centre must be designated a strategic site or sites.</td>
<td></td>
<td></td>
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<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. MM3 - Policy S3. Guildford Borough Council must deliver real and coordinated results.
2. MM3 – Policy S3. Guildford must have an effect Local Plan. Development rules must ensure quality of development across the Town Centre.

Attached documents:

**Comment:** MM37 - LPMM18/1433  **Respondent:** Bob McShee 17225281  **Agent:**

1. Policy A26a must be reviewed of its detrimental impact on the AONB and the AGLV. Also have Highways England been consulted on this new Policy.

Attached documents:

**Comment:** MM40 - LPMM18/5901  **Respondent:** RSPB (Miss Chloe Rose) 17243169  **Agent:**

**Proposal:** Guildford Local Plan: Strategy and Sites - Main Modifications 2018

Thank you for consulting the RSPB. We have limited our response to considering the Main Modifications to Policy A35: Former Wisley airfield, Ockham (MM40).

We remain very disappointed that despite previous concerns raised, Wisley Airfield Site is still allocated for housing in the Guildford Local Plan. The RSPB is not aware of any proposed changes to the design of the SANGs or of any proposals to modify any of the public rights of way, which run through Wisley airfield; in particular those that link to the Thames Basin Heaths Special Protection Area (SPA). The RSPB’s concerns in relation to the impacts that this scheme is likely to have upon the SPA remain. Consequently, the RSPB maintains its objection and believes that Policy A35 should be removed from the plan.

We note the inclusion of MM10a; (10a) ‘Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures’. While welcome, we do not consider this as adequate to address our concerns or sufficient to justify the inclusion of the Wisley site.

We hope you find these comments useful. We would be grateful to be kept informed of progress with the development of the Guildford Local Plan.

Attached documents:

**Comment:** MM2 - LPMM18/3210  **Respondent:** David Thorp 17243873  **Agent:**

The scale of the increase in housing included in the plan would have an important impact deleterious the Guildford Borough where there is a lack of infrastructure to cope with the existing population and plans to eat into the Green Belt are unnecessary. Where I live is accessed by narrow single track lanes which will have limited capacity to take further housing developments in the villages to the south of Guildford including Chilworth.

I ask that the housing target be reduced, for the reasons set out below. I am also concerned about the specific development proposed at Hornhatch Farm in Chilworth, just south of our area (MM43)
MM2 - policy S2. The examination should be re-opened because the housing figures should be revised in the light of the new ONS forecasts of population and households. The stated housing requirement is not a sound basis for the Local Plan or justification for such an extensive loss of Green Belt land.

MM2 - there is a strong case for taking out a strategic site and more scope for better town centre provision. This makes table (S2), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 - independent expert, Neil MacDonald, has demonstrated that 360 homes per year would support the ambitious economic growth rate proposed by the Inspector. 630 homes a year is out of step with the new ONS figures and the Government's new standard methodology. 630 is based on inappropriate assumptions that inflate the figures due to excessive allowance for student homes and their low economic participation.

MM2 - it is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained. The number of houses needed in Woking has also been reduced and has also not been re-examined.

Attached documents:

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**Comment:** MM43 - LPM18/3211  **Respondent:** David Thorp 17243873  **Agent:**

MM43 - Hornhatch Farm, Chilworth. As set out in MM2 above the much lower projection of housing needs removes the necessity to bite into the Green Belt and the development of this site.

Attached documents:

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**Comment:** MM41 - LPM18/2645  **Respondent:** Mrs S. Almeida 17246593  **Agent:**

MM41 Garlicks Arch Sendmarsh, Policy A43.

I hereby object strongly to the above as I live on Sendmarsh Road. Traffic at peak times are already gridlocked due to increased traffic over the years any accident that may occur on the A3/M25 already causes traffic to jam up our small surrounding roads. An increase of 37% in the houses proposed is excessive as every household now has at least three cars with children still living at home.

Garlicks Arch is green belt containing ancient woodland.

The site is subject to flooding and contaminated by lead shot.

Schools and medical facilities will be strained to breaking point as it is one cannot get a doctors appointment as they are too busy!!

Please take note. Do not ignore this objection.

Thank you.

Attached documents:
Comment: MM42 - LPMM18/2646  Respondent: Mrs S. Almeida 17246593  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

I hereby object to the above as there is no need for another industrial estate in a rural area, with surrounding roads that cannot with any more traffic heavy vehicle which will bring more nitrogen dioxide levels which are already dangerous.

Slyfield industrial estate has unused capacity.

Attached documents:

Comment: MM44 - LPMM18/2647  Respondent: Mrs S. Almeida 17246593  Agent:

MM44 Land at Aldertons Farm, Send Marsh Road, Policy A63

I object to the above as this will once again bring more unwanted traffic to Send at Sendmarsh Road which will become a main road towards Portsmouth Road altogether. With 550 more houses at Garlicks Arch this is madness.

Attached documents:

Comment: MM39 - LPMM18/38  Respondent: Neil Smith 17253665  Agent:

MM39 Policy 61: Land At Aaron’s Hill: Site allocated for approximately 200 homes (C3)

I OBJECT to Main Modification 39 on two counts.

1 The site has been removed from the Green Belt.

I object to the removal of Green Belt status from the land between Aaron’s Hill and Halfway Lane.

The whole field between Aaron’s Hill and Halfway Lane is Green Belt land and its openness is important to Godalming and the other communities in the area. It has also been designated as an area of great landscape value.

The revised NPPF states that:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

The value of the Green Belt is undeniable, hence the emphasis on ‘permanence’. Although, course, the NPPF allows development in ‘exceptional circumstances’. In this case, the exceptional circumstances arise, at least in part, from a requirement by the Inspector that Guildford provides more sites to manage an unmet housing need in Woking borough.

This unmet housing need has been questioned by Guildford Borough Council and others. What makes the situation more unpalatable is that the land adjacent to the Guildford Borough Council site is also subject to development, at least in part as a result of Waverley Borough Council having to satisfy part of Woking’s unmet housing need. I do not understand why the Inspector requires Guildford and Waverley to release Green Belt land for development to accommodate a supposed unmet housing need in the Woking borough. Why does Woking have an unmet housing need and why is Woking Borough Council not required to deal with it? I do not understand why Guildford’s Local Plan is deemed sound in so
many respects but runs the risk of being deemed unsound because of problems elsewhere. It would be good if the Inspector could explain simply to the residents in the Guildford and Waverley boroughs why he has instructed the release of the land from Green Belt designation. If it is purely a matter of bureaucratic convenience to help Woking Borough Council overcome a difficulty, this is not enough to justify the application of the ‘exceptional circumstances’ argument.

Further, the scale of the housing need in Guildford and Woking boroughs more generally is being challenged by the CPRE and others. Given the certainties surrounding the question of precise housing need in the boroughs, it seems premature to accept the contention that Green Belt land should be freed for development. Once Green Belt land is developed, it has gone and cannot be reinstated. We are stewards of the Green Belt and, as such, must not let it go lightly.

It is sad to see land removed from the Green Belt; it is even sadder to see Green Belt status removed for reasons that are debatable and certainly far from clear. I worry about the future of our Green Belt if it can simply be spirited away. The political commitment to ‘permanence’ seems to have very little meaning. In this case, will there inevitably one day be another ‘urban extension’ of the Aaron’s Hill field to swallow up more of the surrounding Green Belt?

It is regrettable also that, in the Schedule of Proposed Main Modifications, Sites Summary Table, MM39, Policy 61, the term ‘Godalming Urban Area’ is used, presumably as a description of the location of the site and possibly as a means of making the proposal appear more palatable. If it is a description of the location, it is incorrect. The site lies outside the Godalming Urban Area. Even without the Green Belt protection, the site is a greenfield site of good quality agricultural land, traditionally and currently used for arable farming. It may adjoin an urban area – Aaron’s Hill estate – but it is not part of the urban area.

2 The site is simply not suitable for a major development of an additional 200 homes

There is already a planning application submitted by Ashill for 262 dwellings on the Waverley part of the field between Aaron’s Hill and Halfway Lane. This application that has been met with very strong local opposition, including objections from Godalming Town Council, Shackleford Parish Council and CPRE Surrey Waverley District Committee. Ashill have produced a ‘masterplan’ for the development of the whole field – but it has not been revealed - and the Modification suggests that the Guildford site would allow a further 200 units. A development of 262 dwellings is inappropriate as it will place an unacceptable burden on the local infrastructure and Godalming more generally. A whole field development of 460+ dwellings would be a gross over development and is a step too far.

The debate around the current application by Ashill for Ockford Park indicates clearly the problems that would arise from any major development on the Aaron’s Hill field. It will be easy for developers and landowners to brand opponents of the development of the field as NIMBYs. This is their prerogative but, although there may well be a need for more dwellings in Waverley Borough, this site is simply the wrong place. Successive versions of the NPPF have emphasised how developments should be the right ones and in the right place.

The objections to the Ockford Park application have ranged from threats to flora and fauna on the site, failure to provide adequate protection for a listed building and its gardens, even more congestion in Godalming, inadequate services, amenities and infrastructure (eg problems of finding doctors and dentists locally, as well as pressures on roads) and so on. There are particular challenges facing residents in Lower Eashing and also those who live in the Westbrook Road/New Way area. The problems associated with the development on the Waverley site will certainly be magnified should there be a further major development on the Guildford site.

My particular concern relates mainly to traffic generation and the impact on the local road network.

If one looks at a simple map of the area in a desk-based exercise, the site appears suitable for an urban extension being alongside the Aaron’s Hill estate and near to Godalming Town Centre; however, the reality is very different. If we look more closely and with more care at the road network which would serve the site and the very location and topography of the site, it is clear that there will be significant challenges to existing local communities should any major development go ahead. If a development of 262 dwellings is problematic, then it goes almost without saying a development of an additional 200 dwellings on the Guildford site would be a serious mistake and should be strongly resisted.
There are already substantial pressures on Eashing Lane, the lane which will serve the Aaron’s Hill site. Indeed Eashing Lane is the only public road which will serve the site. The existing problems will certainly become severe should a major development go ahead. Ockford Park will be a huge challenge to the local area. The impact of another major development adjacent to Ockford Park does not bear thinking about!

- Eashing Lane from A283 to Aaron’s Hill

This section of road has long been a rat-run between the A283 and Godalming. There has there been a marked increase in traffic here in recent years, particularly between, say, 0730 and 0930 and between 1600 and 1830 on weekdays. There has also been a noticeable change in the nature of the vehicles using the road, with more and more lorries and vans evident throughout the day. Not only do car drivers regard this as a short-cut between the A3, A283 and Godalming but also it appears to be a preferred route for vans and lorries, presumably with drivers following satnavs. Eashing Lane is generally wide enough to enable two medium-sized cars to pass reasonably comfortably but lorries and vans pose problems, particularly on the stretch between the A283 and The Hollow. The section from The Hollow to the Rickyard may be a little wider but it has a challenging slope and significant bends. Eashing Lane can be tricky for drivers to negotiate and has become very dangerous for pedestrians – there are no footpaths for much of the Lane - and it is now a no-go area for equestrians. Only the stretch from the Rickyard to Aaron’s Hill is a relatively straight and reasonably flat highway with a footpath but even here there is a a tricky almost blind bend as one approaches Green Oak School from the direction of Eashing Farm.

The junction at the top of The Hollow is very dangerous, particularly when turning right out of The Hollow towards Milford or right from Eashing Lane into The Hollow. Traffic often travels towards The Hollow too fast from both the Milford and Godalming directions. The recent accident at the top of The Hollow on 15 September 2018 involved a car travelling along Eashing Lane from the Godalming direction in collision with a vehicle travelling from the Milford direction and turning left into The Hollow. Near misses are not uncommon here.

If there is a development on the Aaron’s Hill site, there will undoubtedly be an increased volume of traffic using Eashing Lane in both directions simply because of the number of dwellings in Ockford Park and the consequent number of vehicles. An additional 262 dwellings in the area will, at a conservative estimate, mean another 500 cars in the locality (The Schedule of Accommodation set out for Ockford Park indeed provides for 585 parking spaces for 262 dwellings). Many of these vehicles will travel down Eashing Lane in the busiest periods with drivers going to work, shopping or on the school run. An additional 200 dwellings will generate another 350+ cars. The prospect of over 850 additional cars in the locality cannot make any sense. It will be a severe challenge to the safety of all those who use the lane.

The traffic analysis supporting the Ockford Park application failed to take account of the flow of delivery vans and lorries throughout the day that has developed as a result of the extension of online shopping and the increased use of the satnav. There are bound to be even more vans and lorries as a result of an additional 200 dwellings.

- Eashing Lane from Aaron’s Hill to the junction with the A3100

This is already a very busy and challenging stretch of road throughout the day but particularly so at the beginning and end of each working day. The start and the end of the school day in term time makes matters worse. It is not uncommon at the busiest times for traffic trying to reach Godalming to be backed up almost to Green Oak School. The problem is simply one of the volume of traffic using this section of road to access Godalming meeting the flow of traffic along the A3100. Whilst some vehicles naturally emanate from Aaron’s Hill and Ockford Ridge, many use this as part of the rat-run from the A283/A3.

Navigating a motor vehicle along this section of Eashing Lane is never easy because of the cars parked along the side of the road - most of the properties in the lower part of the lane do not have garages or off-road parking. For the most part, cars are parked on the right-hand side of the road (looking down the hill) but often the problem is exacerbated by cars and vans parked on both sides of the road near the junction with the A3100. The effect of the parked cars is to reduce the road to one-and-a-half lanes at best. Whilst cars can usually pass each other with care, meeting a bus, van or lorry in this section of road presents a significant challenge.

Should Ockford Park be developed, the existing difficulties presented on Eashing Lane between Aaron’s Hill/Ockford Ridge and the A3100 will be magnified. It is no good simply constructing Ockford Park or any other estate on the
Aaron’s Hill field and expecting the existing road network to cope. The tone of the objections of those residents who live in this area is no surprise and easily understood. Vehicles from an additional 200 dwellings will only worsen the situation.

Members of the Godalming community who have objected to the Ockford Park application have time and again pointed out that the A3100 Portsmouth Road into Godalming is often gridlocked, particularly during the morning rush hour and certainly when there are problems on the A3 (which is a regular occurrence). Traffic joining the A3100 not only find it hard to join the road but also contribute to the gridlock. If the Waverley site is developed, the traffic congestion will certainly worsen. If there are also another 200 dwellings on the Aaron’s Hill field, the result is liable to be catastrophic for the flow of traffic into and through Godalming.

- **Lower Eashing**

There is already a significant highway problem with traffic travelling through Lower Eashing, a difficulty with which the Surrey Highways Department and Guildford Borough Council are only too well aware. In brief:

- The flow of vehicles into Lower Eashing from the A3 and from Eashing Lane via The Hollow at the start and the end of the working day is significant as a result of the Abbey Mill business complex.
- The flow of traffic into Lower Eashing is increased by the popularity of the Stag on the River pub/restaurant.
- Lower Eashing is used as a rat-run between the A3 and Godalming, a challenge to safety in the village that is exacerbated by the on-street parking which is a particular problem on the south side of Eashing Bridges. Residents also complain of speeding traffic on the north side of Eashing Bridges.
- The on-street parking is particularly difficult at lunch-times and in the evening, especially at weekends, during the summer months, when The Stag is particularly popular. Cars are parked along the road between the traffic lights on Eashing Bridges and The Hollow, often beyond Style Cottage, creating, in effect, a very challenging single carriageway road.
- Eashing Bridges are a valuable National Trust monument but they are already vulnerable to the traffic flow. Over the years, The National Trust has had to repair the bridge on various occasions as the result of damage done by lorries and vans.

Should Ockford Park be developed, traffic using Lower Eashing as a through route between the site and the A3, Elstead and beyond will certainly pose additional problems for the community of Lower Eashing. This point is emphasised in the penultimate paragraph in the letter of objection to Ockford Park submitted by Shackleford Parish Council on 30 August 2018.

I am very concerned that the current problems faced by Lower Eashing and the potential problems following the development of Ockford Park were ignored in the supporting i-Transport traffic analysis, even though they were raised by residents in the Consultation Meeting in May 2018 and acknowledged by jtp in its Design and Access Statement. It is quite understandable that the developers do not want to become involved in an existing problem that has largely been ignored by Surrey County Council. Nevertheless, it is important not only that the problem is acknowledged but also that it will be worsened if more vehicles are driven through Lower Eashing, an undoubted consequence of the development of Ockford Park.

It is undeniable that an additional 200 dwellings on the Aaron’s Hill field will certainly increase the problems facing the residents of Lower Eashing.

- **How hazardous is Eashing Lane?**

The i-Transport traffic assessment supporting the Waverley application concluded that there is little potential danger to safety based on an analysis of accidents along Eashing Lane.

4.8.9 In summary, whilst any accident is regrettable, the PIA data does not identify any significant road safety problems in the local area (albeit there is a modest concentration of collisions involving right turners out of Eashing Lane onto the A283 – three slight accidents).

This analysis and its subsequent conclusions about Eashing Lane are misleading. It focuses on collisions and subsequent injuries. It fails to acknowledge the fact that Eashing Lane between the A283 and Aaron’s Hill, particularly the section
from the A283 to Eashing Farm, is dangerous and not just for motorists - pedestrians, cyclists and equestrians now increasingly avoid the lane. It focuses on motorised vehicles and reported incidents. Of course, there are incidents that may not be recorded, for whatever reason, and near-misses. In the context of collisions, it is interesting to note the regular and frequent appearance along Eashing Lane, particularly the stretch between the A283 and The Hollow, of wing mirrors and wheel trims! The recent collision of two vehicles at the top of The Hollow on 15 September 2018 was an accident waiting to happen.

It used to be commonplace for equestrians to ride out from Upper Eashing and Lower Eashing to BW124 (on the stretch of Eashing Lane south of the Hollow towards A283), which leads onto the bridleway network beyond the A3 towards Thursley and Elstead) or from Upper Eashing through Lower Eashing to the equestrian bridge (and thence to the bridleway network in Shackleford). This has ceased in the past five years simply because of the dangers posed by the volume and nature of the traffic using Eashing Lane and the road down The Hollow through Lower Eashing.

Fewer pedestrians now use the stretch of Eashing Lane from the A283 to the Hollow. Even though there is no footpath along the lane, it used to be commonplace for pedestrians to use this route to Milford to visit the shops or attend the dentist or doctors’ surgeries. Similarly runners used Eashing Lane as part of a circuit that included the A3100. Pedestrians and runners are now seen much more infrequently because of the increased volume of cars and other vehicles, especially lorries and delivery vans. Probably for the same reason, the public footpath linking Eashing Lane, near the start of BW124, to Lower Eashing across the field to the west of Eashing Lane is no longer used by walking groups with the frequency that it once was.

The stretch of Eashing Lane between The Hollow and Eashing Farm is hazardous for pedestrians as there is no footpath here. The bends between Dean Cottage and Eashing Farm make this a particularly difficult area. Walking groups occasionally use this part of the Lane en route from Halfway Lane to the public footpath alongside Dean Cottage or to Lower Eashing via The Hollow. This is a very dangerous section of road.

Cyclists continue to use the stretch of road from A283 to Eashing Farm but it can be no joy to do so and there is less evidence of residents choosing to cycle along the Lane. From my own personal perspective, I used to regularly ride a bike along Eashing Lane to Milford. I would no longer consider so doing. It has simply become too dangerous.

Delivery vans and lorries who use Eashing Lane to deliver to the dwellings in Upper and Lower Eashing and as a short cut to and from Godalming are a fact of life and will surely increase in number owing to the demands of the Ockford Park residents for their services. The erosion of the roadsides is testament to the heavy use of the lane. The traffic assessment ignored this point. It is a simple fact that the volume of this sort of traffic will increase and pose additional challenges in an already significantly challenged area.

Eashing Lane has simply become busier and busier in recent years. The great irony is that, in attempting to create a sustainable development at Ockford Park, with opportunities for people to walk and cycle to shops and other facilities (in line with the NPPF guidelines), one is making it even more difficult for residents in the Eashing Lane area to do so.

It is important to note that the validity of the i-Transport traffic assessment has been called into question. There is no doubt among those of us who live in the area that the lane is already dangerous and that any development on the Aaron’s Hill field will increase the dangers.

- Mitigation measures

Ashill have suggested mitigation measures in support of their current application but they are totally inadequate. The measures do not address the basic fact that more vehicles – cars, vans and lorries - will use this largely country lane after the development of Ockford Park and create additional challenges to the Eashing Lane community. They may contribute to making the movement of vehicles a little slower but the essential fact remains that the lane will simply be busier.

Probably the most glaring weakness, however, is that the proposed mitigation scheme includes nothing to help the community of Lower Eashing whose current problems will surely be exacerbated by the existence of Ockford Park. This failure to extend mitigation measures to Lower Eashing displays a scant regard for the Lower Eashing community who will undoubtedly see more vehicles travelling through their village. By ignoring Lower Eashing, i-Transport have
demonstrated an insecure grasp of the traffic realities in the area or have chosen to ignore what is arguably the most challenging problem.

The problem with any mitigation measures for any major development on the Aaron’s Hill field is simply that Eashing Lane and Lower Eashing will be unable to cope with the additional traffic generated. This point has so far been ignored or glossed over by Ashill.

- **The myth of ‘sustainability’**

Much has been made by Ashill about the sustainability of their Ockford Park scheme – and they will surely do the same should the additional 200 dwellings be agreed. This is not surprising as the NPPF requires this of such developments. Their case was summarised by Ben Boyce, Managing Director of Ashill, at a Guildford Borough Council Special Executive Meeting held on 4 September to discuss Modifications to the Guildford Local Plan.

Mr Boyce largely reiterated what had already been published in the Ockford Park August 2018 newsletter. He said that the site was ‘extremely well located with pedestrian access to the town centre and railway station ... with a wealth of services and amenities within walking distance of the site’. I am, however, left wondering whether the Ashill team really have a secure grasp of the location of the proposed development which rests above Godalming or whether they are simply doing their best to promote their scheme by choosing to ignore the glaringly obvious. It may well be that residents will walk (or cycle) down the hill towards Godalming Town Centre and the station, weather permitting, but I doubt that they will find it easy to return up the hill by foot or bicycle laden with shopping or at the end of a long day at work. The hill through the Country Park or via Westbrook Road will be taxing except for the fittest – or most determined - members of the Ockford Park community. The option of walking down to the Town Centre via Aarons Hill, Eashing Lane and the A3100 is certainly a non starter. We need to be realistic - in most cases the car will be used to go to the Town Centre – certainly to supermarkets – and to the station to pick up commuters (even those who have walked to the station in the morning!). If the weather is inclement, only the hardest will forsake the car. Of course, buses may be an option but comments already made suggest considerable dissatisfaction with the existing bus service in the area and, in any case, the car is the usual option for those who have one. The whole concept of walking to the shops and to the station is no more than an attempt to emphasise the ‘sustainability’ credentials of the development. There is little doubt that Ockford Park will generate more car movements than Ashill suggests and, therefore, add to the congestion along the A3100 and increase the highway safety hazards along Eashing Lane and in Lower Eashing.

If 262 dwellings in Ockford Park are deemed unacceptable because of the pressure on the road network surrounding the site and the consequent negative impact on the well-being of the residents of the local communities, then an additional 200 dwellings on the Guildford part of the field should not be agreed. The ‘sustainability’ argument is a myth.

On the issue of sustainability more broadly, ‘a wealth of services and amenities within walking distance of the site’ is an interesting observation. This must broadly refer to Godalming Town Centre which, as explained above, is a trek down a hill from the site and a challenging one uphill. There is very little in terms of ‘services and amenities’ in the Aaron’s Hill/ Ockford Ridge area. Apart from the church, church hall, cemetery and primary school in the Ockford Ridge area, there are few amenities nearby. There is a small newsagent shop on Quarry Hill. The nearest food shops, other than those in Godalming, are in Milford, to which most people will drive. There are two small playgrounds and a skate park. There is no pub/restaurant in the intermediate area – the closest are in Shackstead Lane, Godalming, Milford and Lower Eashing. More importantly, however, many of those who have responded to the Ockford Park application complain bitterly that it is already very hard to get doctors’ appointments or see NHS dentists in Godalming. There is indeed a bus service to Aaron’s Hill but residents say that it needs significant improvement and the reality remains that most people will use a car. The ‘sustainability argument’ based on proximity to ‘a wealth of services and amenities within walking distance of the site’ simply does not have any substance. Indeed, the main impact of developing the site will be more pressure on the amenities and services in Godalming which are already overstretched.

One big selling point of the Ockford Park site is that it will help sustain Green Oak school, a severely undersubscribed primary school in Franklin Road which has been threatened with closure by Surrey County Council. The development will ‘help to significantly improve the long term viability of the school’ (August 2018 newsletter). This may be the case but it may not. All will depend on what progress the school makes over the next few years and how the residents of the new development view the school.
The other community benefits flagged up by Ashill are a community building (but it is not yet clear what its purpose will be) and a suburban ‘Country Park’ in what is currently an undeveloped natural hillside with open spaces, woods and pathways (but it is not clear who will manage the park in the longer term beyond the initial honeymoon period of the development). The ‘open spaces’ portrayed in the newsletter are illusory if one looks closely at the densely packed ‘masterplan’.

The flaws in the argument that Ockford Park has sustainable credentials are crystal clear and the community benefits are minimal. Far from being sustainable, the development may easily damage the sustainability of the existing Godalming community. The addition of 200 additional dwellings in the Guildford part of the ‘masterplan’ will simply compound the challenges presented by Ockford Park.

Conclusion

The revised NPPF (July 2018), 109, p 32 says

‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’.

It is not surprising, therefore, that the transport assessment supporting the Planning Application for Ockford Park repeatedly emphasised the view that the proposed development will not have a severe impact on the local road network. This is wrong.

I do not agree with the final statement of the Executive Summary: ‘There are no traffic or transport-related reasons for refusing planning permission’ (i-Transport Executive Summary, p 3). It is interesting to note that local residents’ concerns over traffic matters dominated the responses to the development in the initial ‘consultation phase’ (acknowledged in the Design and Access Statement p 32) and also the responses to the planning application itself. I would argue that there are already significant highway safety issues that exist in the Eashing Lane area, including Lower Eashing, and that the proposed development at Ockford Park is in danger of raising the risk to severe. Further, the existing significant congestion along the A3100 will become intolerable.

If the Guildford part of the field between Halfway Lane and Aaron’s Hill adjoining the proposed Ockford Park is released from the Green Belt and set aside for a development of an additional 200 homes, the risk is raised even further and existing local communities will be put under even greater and unnecessary severe strain. The Ockford Park development is too big and not sustainable. An additional development will simply make matters even worse.

It is sad to note that, in the Schedule of Proposed Main Modifications, MM39, Policy 61, the Requirements do not include a statement that the development should take note of the local road network and the well-being of the Godalming communities. The proposal appears ill thought through and carelessly drafted. Bearing in mind the planning application to develop the Waverley part of the field, MM39 makes no sense whatsoever except perhaps as a means of resolving a numerical exercise in providing more houses (and there is another debate for the planning authorities to be had on what sort of houses are actually needed; genuinely affordable houses for sale or for rent are needed in Guildford and Waverley not the balance which is currently proposed for Ockford Park).

The development of the Aaron’s Hill field makes little sense except as a convenient means of satisfying a debatable housing need. It is unsustainable, removes precious Green Belt and good quality agricultural land, potentially adds an unacceptable level of congestion to the existing road network and threatens the safety and well-being of those who live in the communities in the vicinity of Eashing Lane.

Therefore, I strongly urge the Inspector to re-think his initial proposal to release the Guildford part of the Aaron’s Hill field for development. If he does not do so, I strongly urge Guildford Borough Council to resist this decision, set aside MM39, Policy A61 and reestablish a Green Belt designation for the site.

If he has not already done so, it may be sensible for the Inspector to visit the Aaron’s Hill site and also view Eashing Lane, Lower Eashing, the junction with the A3100 and the Westbrook Road/New Way area, including the lauded walking
routes into Godalming, to get a flavour of why so many in the Godalming community are upset by the Ockford Park application and the possibility of an additional 200+ dwellings on the field.

Attached documents:

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**Comment:** MM45 - LPMM18/2517  **Respondent:** William Cross 17286945  **Agent:**

to whom it may concern

I don't think that this hasn't been thought out at all with 105 houses proposed to be built and my main concern is the extra traffic in the area its terrible now what will it be like with another 100 cars plus down glaziers land and wanborough hill, also there isn't any shops in Normandy apart from motorcycle shop and music shop

also you are eroding the greenbelt

Attached documents:

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**Comment:** MM41 - LPMM18/2951  **Respondent:** Andrew Bedworth 17288513  **Agent:**

**Objection to proposed development in Send**

**MM41 Garlicks Arch, Send March, policy A43**

1. Local infrastructure such as schools and GP practices could not cope and would need further investment.
2. Strong opposition existed to the original proposal for 400 homes, but 550 are now on the plan. This 37% increase is disproportionate and ignores the 7,000+ objections that have already been lodged.
3. This site contains ancient woodland and is in the Green Belt.
4. The effect of it would be to join Ripley and Send and constitutes over development.
5. The roads are already congested particularly around rush hour: this would add a further 800+ cars.
6. There would be a likely impact on ground water run-off caused by further development with an increased risk of flooding, in an area already susceptible.

Attached documents:

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**Comment:** MM42 - LPMM18/2953  **Respondent:** Andrew Bedworth 17288513  **Agent:**

**42 Burnt Common, London Road, Send, policy A58**

1. Slyfield has unused space: it is therefore unnecessary to build on Green Belt.
2. There has been a reduction in demand for industrial land as per the Employment Land Needs Assessment.
3. No special circumstances exist and therefore this contradicts MM9.
4. This is on top of the 25% increase in the Send Business Centre making the burden on Send village disproportionate to that of any other village.
5. It will add to the instances of gridlock and boost already dangerously high nitrogen oxide levels. The increase from 7000sq m to a minimum of 14,800sq m of industrial / storage would make this the largest industrial site
allocation in the borough, and has happened despite its deletion from the 2014 plan. It is therefore illogical that this has been tabled.

The proposed wider development in Send Marsh has no consideration for the impact on the village of the overall planning proposals, which would see dwelling numbers increase by around 45%+.

Attached documents:

**Comment: MM44 - LPMM18/2952  Respondent: Andrew Bedworth 17288513  Agent:**

MM MM44 Alderton’s Farm, Send Marsh Road, policy A63

1. Other brown land sites should be thoroughly investigated and developed before encroaching on Green Belt.
2. Local infrastructure could not cope and would need further investment.
3. Why is this back on the plan when it had been deleted from an earlier draft due to all the local objections: this will be a loss of Green Belt land with no special circumstances, in contravention to MM9.
4. The roads are already congested particularly around rush hour.
5. There would be a likely impact on ground water run-off caused by further development with an increased risk of flooding.

Attached documents:

**Comment: MM2 - LPMM18/5575  Respondent: Brian McGee 17295265  Agent:**

RESPONSE TO MODIFIED GUILDFORD LOCAL PLAN

I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

The Clandon Society Objections and Concerns Which I Share

The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247
The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

THIS ROAD SHOULD BE DE-CLASSIFIED TO THE B-ROAD WHICH IS ALL IT IS ADEQUATE ENOUGH TO BE. TRAFFIC FOR THE A3 FROM THE A25 SHOULD BE SENT THROUGH MERROW TO THE ROUNDABOUTS & DUAL CARRIAGEWAY ALREADY BUILT FOR THE PURPOSE YEARS AGO.

Attached documents:

**Comment:** MM2 - LPMM18/2416  **Respondent:** Robyn Cormack 17296321  **Agent:**

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

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7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.
MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2419 Respondent: Robyn Cormack 17296321 Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/2428 Respondent: Robyn Cormack 17296321 Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:
**Comment: MM3 - LPMM18/2417  Respondent: Robyn Cormack 17296321  Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM3 - LPMM18/2427  Respondent: Robyn Cormack 17296321  Agent:</th>
</tr>
</thead>
</table>
| 1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM31 - LPMM18/2420  Respondent: Robyn Cormack 17296321  Agent:</th>
</tr>
</thead>
</table>
| MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM32 - LPMM18/2421  Respondent: Robyn Cormack 17296321  Agent:</th>
</tr>
</thead>
</table>
| MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**
**Comment:** MM33 - LPMM18/2422  **Respondent:** Robyn Cormack 17296321  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

---

**Comment:** MM35 - LPMM18/2423  **Respondent:** Robyn Cormack 17296321  **Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

**Attached documents:**

---

**Comment:** MM35 - LPMM18/2424  **Respondent:** Robyn Cormack 17296321  **Agent:**

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/2425  **Respondent:** Robyn Cormack 17296321  **Agent:**

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment:** MM44 - LPMM18/2426  **Respondent:** Robyn Cormack 17296321  **Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

**Attached documents:**

---

**Comment:** MM9 - LPMM18/2418  **Respondent:** Robyn Cormack 17296321  **Agent:**

---
MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM40 - LPMM18/4750 Respondent: Aileen Aitcheson 17299681 Agent:

Guildford Local Plan: comments on Proposed Modifications

I submit this letter under GBC’s current local plan consultation and it addresses Site Policy A35, land at the former Wisley Airfield in Ockham.

POLICY A35 Land at former Wisley Airfield, Ockham

MM40 of the Modifications Schedule sets out a number of minor changes to Site Policy A35, the development of a new settlement at the former Wisley Airfield site. However, my primary concern is why, after a public inquiry has so robustly refused planning permission for this site, have GBC chosen to keep this site policy within the local plan?

Implications of planning appeal decision

In September/October 2017 an extensive public inquiry was held following a planning appeal by the site owner, Wisley Property Investments Ltd (‘WPIL’) subsequent to GBC’s refusal of planning permission in April 2016. The site addressed at the appeal was marginally different from Site Policy A35, which has been expanded to include land surrounding Bridge End Farm at the southern edge of the site.

On 13th June 2018, the WPIL appeal was refused by the Secretary of State, the announcement being made whilst the local plan was still being examined. In reaching their decision both the inspector and the Secretary of State gave considerable weight to the Green Belt harm caused by the proposed development, gave substantial weight to the severe impact on the strategic road network, considerable weight to the harm done to heritage assets, significant weight to the harm done to local character and appearance, and significant weight to irreversible landscape harm, including permanent harm to views from the Surrey Hills AONB.

The appeal inspector, Mr Clive Hughes, was particularly critical about the impact which the development would have on the character of the local area, commenting in paragraph 20.95:

“...the overall impact would result in substantial harm to the character of the immediate area. Being sited at the very heart of Ockham parish it would, in effect, link all the surrounding hamlets. It would erode the historic pattern of development in the area to the detriment of the character of these settlements. It would fail to reflect or respect its immediate setting and I agree with the nearby residents that this impact would be catastrophic on their rural way of life.”

With such a clear refusal of the WPIL appeal, it was therefore surprising that just two days’ later on 15th June 2018, GBC issued a ‘Discussion Note’ stating their intention to retain Site Policy A35 within the local plan. Three main grounds were cited by GBC for this position:

95. a) that Policy A35 was different to the appeal site, being a total of 95.9 hectares in size compared to the 114.7 hectares of the appeal site, although the developable land area was increased by approximately 20%;
96. b) that the removal of this site from the Green Belt would mean Green Belt harm was no longer a relevant planning consideration;
97. c) that Highways England and WIPL were close to finalizing an agreement over infrastructure contribution which would allow Highways England to withdraw their objection to this development that they had lodged at the appeal.
Site Policy A35, like all of the larger sites within the local plan, has been subjected to examination by the local plan examiner, Mr Bore, in the first half of 2018. In February 2018 EHPC submitted a Statement to Mr Bore addressing Site Policy A35 – ie, well before the WPIL appeal decision had been announced. The examiner’s public hearing for Site A35 was held on 5th July 2018, the very last item to be considered at the examiner’s open sessions. At this hearing EHPC’s representative drew attention to the flaws in GBC’s argument that the site is materially different from the WPIL appeal site. As the representative explained, the difference between the two sites only increases the overall planning harm, it does not reduce it. He further explained that the strongly negative planning balance means the Exceptional Circumstances test is not met, so the argument that Green Belt harm is irrelevant is fallacious. A copy of this hearing address is given as Appendix 2 to this submission.

At the public hearing it also became evident that Highways England had still not finalized any agreement with WPIL over the road infrastructure commitments required to support site development.

Despite all of the arguments against this site, as soon as the Site Policy A35 hearing was concluded the examiner summarised his overall position on the local plan, announcing he was not intending to recommend the removal of any sites.

Flaws in the local plan process

I believe the local plan process contains a series of flaws in respect of Site Policy A35, including the following:

1. The examiner’s decision on Site Policy A35 was made within a few minutes after the closing of the public hearing. He could not possibly have had time to properly assess all of the arguments presented. This is a clear case of pre-determination;
2. The examiner did not recommend the removal of any sites from the local plan. Given the large number of arguments made against many of the sites within the local plan, the absence of any one single site being proposed for removal implies either that the examination process in reviewing sites was little more than a token exercise, having no real validity, or that the benchmark level used by the examiner for assessing the soundness of any site policy was set so high as to be effectively worthless;
3. The examiner did not permit any further written submissions from hearing participants on Site Policy A35 following the publication of the Secretary of State’s appeal decision, other than from GBC. In view of the importance of the appeal decision towards assessing the soundness of Site Policy A35, we believe such submissions should have been permitted.
4. GBC issued their Discussion Note on Site Policy A35 within two days of the Secretary of State refusing the WPIL appeal. The extensive arguments made by the appeal inspector and the Secretary of State cannot possibly have been properly reviewed by GBC and their advisers. Yet it seems that GBC are so determined to retain this site within the local plan that even the reasoned arguments of the appeal inspector and the Secretary of State count for naught.

The case for removing Site Policy A35 from the local plan

The deficiencies of this site have been covered at length in earlier consultation submissions made by EHPC and many others. The Secretary of State and the appeal inspector in their June 2018 report provided a detailed review of the key planning benefits and harms involved by this development. The modest differences between the WPIL site and Site Policy A35 have no qualitative impact on the fundamental planning issues in this respect.

In our Statement to the examiner, EHPC provided an analysis of the summary planning balance for this site, included as our Appendix 1 here, in order to demonstrate that the Exceptional Circumstances test required to remove this site from the Green Belt is not met.

EHPC believes the case for removing Site Policy A35 from the local plan is now overwhelming. In particular we would highlight the following factors:

1. The Exceptional Circumstances Test for Green Belt release is not met;
2. The site is fundamentally unsustainable. This is one of the most fundamental requirements of NPPF policy, yet the updated Sustainability Appraisal provided to GBC by AECOM still shows this site as having the worst sustainability of any large site within the local plan;

3. All necessary infrastructure facilities have to be newly provided. This will involve a number of substantial new infrastructure projects of different kinds with considerable uncertainties over their delivery and funding. We note in particular:

4. The development is effectively dependent upon the completion of a major new improvement scheme at the busy A3/M25 junction, the timing and design of which still remains uncertain;

5. The development is also dependent upon the building of new south-facing slip roads to and from the A3 at the Burnt Common junction, whose timing and funding is also uncertain;

6. Policy A35 requires a mitigation scheme to address traffic issues at the junction of Ripley High Street and Newark Lane (leading to Woking), but it is not evident that such mitigation is physically possible;

7. Major new sewage facilities will be needed at Ripley sewage works, the timing of which is uncertain;

8. Highways England objected to the proposed development at the WPIL appeal due to its harmful impact on the strategic road network and although GBC’s Discussion Note of July 2018 indicated an agreement between WPIL and Highways England was then imminent, no such agreement has yet been announced.

9. Additional ecological protection may be required from that proposed by WPIL in their refused planning application. This follows from two recent landmark judgements in the Court of Justice for the EU, namely the ruling on 25th July 2018 by Advocate General Kokott concerning nitrogen deposition at protected sites, and the decision on 13th April 2018 in the matter of ‘People Over Wind’ which potentially alters the UK position in relation to appropriate assessments under the Habitats Directive. Previously-proposed SANG provisions and other ecological measures may have to be significantly enhanced at Site A35 as a result of these rulings, potentially reducing the developable area of the site still further.

10. The only reason for having such an unsustainable site within the local plan is its contribution towards new housing supply for the borough. However, we note that:

   1. The latest national housing projections released by ONS show major reductions in the projected housing need through to 2034, an approximate 25% reduction nationally from previous projections. Therefore, it may be questioned whether sufficient housing need may actually arise to justify the proposed new settlement;

   2. Total housing numbers planned in the latest version of the local plan show the Wisley site is unnecessary for meeting the overall assessed housing needs of the borough, as estimated in the new version of the local plan;

   3. It is now highly unlikely that this site will make any contribution to the 5 year housing supply of the borough.

Concluding remarks

Site Policy A35 is based upon a site which is unsustainable and totally reliant on infrastructure whose delivery is very uncertain, whilst its contribution to borough housing targets appears potentially unnecessary. The appeal inspector commented that the impact of this development on local residents would be ‘catastrophic’ to their way of life.

Accordingly I urge GBC to remove Site Policy A35 from the local plan.

Attached documents:
POLICY A35 Land at former Wisley Airfield, Ockham

MM40 of the Modifications Schedule sets out a number of minor changes to Site Policy A35, the development of a new settlement at the former Wisley Airfield site. However, my primary concern is why, after a public inquiry has so robustly refused planning permission for this site, have GBC chosen to keep this site policy within the local plan?

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In September/October 2017 an extensive public inquiry was held following a planning appeal by the site owner, Wisley Property Investments Ltd (‘WPIL’) subsequent to GBC’s refusal of planning permission in April 2016. The site addressed at the appeal was marginally different from Site Policy A35, which has been expanded to include land surrounding Bridge End Farm at the southern edge of the site.

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"...the overall impact would result in substantial harm to the character of the immediate area. Being sited at the very heart of Ockham parish it would, in effect, link all the surrounding hamlets. It would erode the historic pattern of development in the area to the detriment of the character of these settlements. It would fail to reflect or respect its immediate setting and I agree with the nearby residents that this impact would be catastrophic on their rural way of life."

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95. a) that Policy A35 was different to the appeal site, being a total of 95.9 hectares in size compared to the 114.7 hectares of the appeal site, although the developable land area was increased by approximately 20%;
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97. c) that Highways England and WIPL were close to finalizing an agreement over infrastructure contribution which would allow Highways England to withdraw their objection to this development that they had lodged at the appeal.

Site Policy A35, like all of the larger sites within the local plan, has been subjected to examination by the local plan examiner, Mr Bore, in the first half of 2018. In February 2018 EHPC submitted a Statement to Mr Bore addressing Site Policy A35 – ie, well before the WPIL appeal decision had been announced. The examiner’s public hearing for Site A35 was held on 5th July 2018, the very last item to be considered at the examiner’s open sessions. At this hearing EHPC’s representative drew attention to the flaws in GBC’s argument that the site is materially different from the WPIL appeal site. As the representative explained, the difference between the two sites only increases the overall planning harm, it does not reduce it. He further explained that the strongly negative planning balance means the Exceptional Circumstances test is not met, so the argument that Green Belt harm is irrelevant is fallacious. A copy of this hearing address is given as Appendix 2 to this submission.

At the public hearing it also became evident that Highways England had still not finalized any agreement with WPIL over the road infrastructure commitments required to support site development.

Despite all of the arguments against this site, as soon as the Site Policy A35 hearing was concluded the examiner summarised his overall position on the local plan, announcing he was not intending to recommend the removal of any sites.
**Flaws in the local plan process**

I believe the local plan process contains a series of flaws in respect of Site Policy A35, including the following:

1. The examiner’s decision on Site Policy A35 was made within a few minutes after the closing of the public hearing. He could not possibly have had time to properly assess all of the arguments presented. This is a clear case of pre-determination;

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**The case for removing Site Policy A35 from the local plan**

The deficiencies of this site have been covered at length in earlier consultation submissions made by EHPC and many others. The Secretary of State and the appeal inspector in their June 2018 report provided a detailed review of the key planning benefits and harms involved by this development. The modest differences between the WPIL site and Site Policy A35 have no qualitative impact on the fundamental planning issues in this respect.

In our Statement to the examiner, EHPC provided an analysis of the summary planning balance for this site, included as our Appendix 1 here, in order to demonstrate that the Exceptional Circumstances test required to remove this site from the Green Belt is not met.

EHPC believes the case for removing Site Policy A35 from the local plan is now overwhelming. In particular we would highlight the following factors:

1. The Exceptional Circumstances Test for Green Belt release is not met;

2. The site is fundamentally unsustainable. This is one of the most fundamental requirements of NPPF policy, yet the updated Sustainability Appraisal provided to GBC by AECOM still shows this site as having the worst sustainability of any large site within the local plan;

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10. The only reason for having such an unsustainable site within the local plan is its contribution towards new housing supply for the borough. However, we note that:

1. The latest national housing projections released by ONS show major reductions in the projected housing need through to 2034, an approximate 25% reduction nationally from previous projections. Therefore, it may be questioned whether sufficient housing need may actually arise to justify the proposed new settlement;

2. Total housing numbers planned in the latest version of the local plan show the Wisley site is unnecessary for meeting the overall assessed housing needs of the borough, as estimated in the new version of the local plan;

3. It is now highly unlikely that this site will make any contribution to the 5 year housing supply of the borough.

Concluding remarks

Site Policy A35 is based upon a site which is unsustainable and totally reliant on infrastructure whose delivery is very uncertain, whilst its contribution to borough housing targets appears potentially unnecessary. The appeal inspector commented that the impact of this development on local residents would be ‘catastrophic’ to their way of life.

Accordingly I urge GBC to remove Site Policy A35 from the local plan.

Attached documents:

Comment: MM12 - LPMM18/1310  Respondent: Mrs Lynda Turner 17301473  Agent:

I object to the change in wording to policy paragraphs 1.2(c). 3(d) and 4 ?the measures must be agreed with Natural England.

Attached documents:

Comment: MM2 - LPMM18/1307  Respondent: Mrs Lynda Turner 17301473  Agent:

The proposed increase in number of dwellings is far too high. The method used to calculate number of houses needed in the borough doesn’t take account of the need to preserve the designated green belt land and historic woodland which enhances air quality for the area. The housing increase has a disproportionate impact on Send, Send Marsh and Burnt Common particularly

Attached documents:

Comment: MM22 - LPMM18/1311  Respondent: Mrs Lynda Turner 17301473  Agent:
I have already lodged objections to the proposals for Gosden Hill and Wisley airfield and I object to their classification as new local centres.

**Comment:** MM23  -  LPMM18/1312  **Respondent:** Mrs Lynda Turner 17301473  **Agent:** 

Policy D4. 1(b), 1(m), 2(a) and b should be kept so the development respects existing open space views and takes account of increased air pollution and noise when considering planning proposals.

**Attached documents:**

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**Comment:** MM25  -  LPMM18/1313  **Respondent:** Mrs Lynda Turner 17301473  **Agent:** 

The green belt should be treated as an important and irreplaceable asset for now and the future. I strongly object to the change of wording in order to ensure that the absolute protection of this asset is protected.

**Attached documents:**

---

**Comment:** MM27  -  LPMM18/1314  **Respondent:** Mrs Lynda Turner 17301473  **Agent:** 

There has been an inadequate assessment of increased traffic problems of the huge development proposals concentrated on the northern boundaries of the borough. There needs to be a proper assessment of the transport implications on the A3, M25, and A247 of the proposed increase in housing and industrial areas at Send Marsh, Burnt Common, Wisley and Gosden Hill.

**Attached documents:**

---

**Comment:** MM41  -  LPMM18/1316  **Respondent:** Mrs Lynda Turner 17301473  **Agent:** 

I object to the increase in the number of proposed dwellings on green belt. The development would be isolated from the villages, bounded on all sides by busy roads. There is no infrastructure to support a huge increase in population.

**Attached documents:**

---

**Comment:** MM41  -  LPMM18/1317  **Respondent:** Mrs Lynda Turner 17301473  **Agent:**
The characters of the villages would be ruined. Air and noise pollution which is already unacceptable and would be hugely increased.

Attached documents:

**Comment:** MM42 - LPMM18/1318  **Respondent:** Mrs Lynda Turner 17301473  **Agent:**

I strongly object to the massive increase in industrial, storage and distribution floor space. It is inappropriate for the overstretched transport network. The A3 and other local roads would not cope with the huge increase in heavy traffic.

Attached documents:

**Comment:** MM44 - LPMM18/1319  **Respondent:** Mrs Lynda Turner 17301473  **Agent:**

I strongly object to this proposal for additional traffic. It would cause a huge detrimental impact on the villages of Send, Send Marsh, Burnt Common, Ripley. The access to the roads for residents here is extremely difficult at all times of the day.

Attached documents:

**Comment:** MM5 - LPMM18/1308  **Respondent:** Mrs Lynda Turner 17301473  **Agent:**

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. Not a sensible siting near the proposed housing areas.

Attached documents:

**Comment:** MM9 - LPMM18/1309  **Respondent:** Mrs Lynda Turner 17301473  **Agent:**

The housing and commercial development proposed in the green belt should not as a matter of policy be approved.

Attached documents:

**Comment:** MM9 - LPMM18/5275  **Respondent:** Eileen Stone 17307457  **Agent:**
Having expressed my concerns back in July 2017 as a concerned parent of a West Horsley resident I find myself having to disagree with one of the aspects of the current proposals.

The proposal to inset several towns and villages from the Green Belt thus making development in those areas that much easier is in my view fundamentally wrong.

What a legacy for our grandchildren if this unwarranted proposal is adopted!!

Attached documents:

Comment: MM2 - LPMM18/1654  Respondent: Shirley Bowerman 17308417  Agent:

Objection re the over-all effect which the Modifications bring to other developments in Send.

What I have described as the ‘punitive’ Modifications above, combined with the figures already incorporated into the Plan (ie 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and the 25% increase in the Send Business Centre), plus the new Marina being constructed off Tannery Lane, means that such a heavy concentration of development in one village rather than the other 40 villages, is way beyond reasonable and does appear to be designed to a) punish Send for making so many objections, rather than taking the objections into account which is supposed to be what happens, or b) change Send beyond all recognition so that other villages do not have to be much altered. Either way, this is wrong and a travesty of justice.

7) Further objections on the fact that estimates for future housing needs were incorrect.

I object to all the MMs and previous calculations where Guildford Borough housing needs were said to be 789 a year. The basis on which this figure was arrived at was never published and it has recently transpired that they were grossly exaggerated as was previously strongly suspected. A respected consultancy, Barton Willmore, has very recently said that the correct figure should be 431. September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both of these recent figures are very much less than the total used by the Inspector. If these, apparently more reliable, figures are used it would make a huge difference to developments in Send. The bulk of the reduction should be applied to Send since that village has disproportionately penalised.

Attached documents:

Comment: MM27 - LPMM18/1650  Respondent: Shirley Bowerman 17308417  Agent:

Objection applying generally to MM27, MM41, MM42 & MM48. Transport Strategy,

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads. The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

Attached documents:
MM41. Land at Garlicks Arch, Send Marsh, Policy A43.

This appears to be a ‘punishment’ instance where the original grossly excessive number of 400 homes in a totally unsuitable location appears to have been increased to 550 because thousands of local residents have had the nerve to object strongly.

The impact of 550 households on traffic around Send and Send Marsh, not to mention Burnt Common itself, will be devastating. The area already suffers long hold-ups, especially during peak-times and holiday periods. An extra 800 or so cars will clog surrounding over-busy roads and lanes for miles around. The resulting increase in traffic will also increase the noise and air pollution from traffic which is already audible from at least a mile away, depending on the wind direction.

Some 550 new houses will grossly affect the nature of what is presently a pleasant rural village. Ancient woodland, especially in the Green Belt, should be given utmost protection as it has already hugely diminished. Brown-field sites are available elsewhere. The site is unsuitable anyway, being subject to flooding and contaminated with lead shot.

School facilities are already inadequate, not least due to the unconscionable closure of Ripley First School. Medical facilities are already over-stretched. To join up Send, Send Marsh and Ripley, which this would do, would be a case of unnecessary over-development.

No direct evidence has been produced for the 400 new houses, let alone 550, the number of which would be greatly out of keeping with the area.

Attached documents:


The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads. The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

Attached documents:

MM42. Land at Burnt Common, London Road, Send. Policy A58.

I strongly object to this as the area concerned has been increased from 7,000sqm to a minimum of 14,800sqm. Is this serious or is it a mistake? If this is a minimum, how will it be enforced if too few applications are made. And presumably without a maximum, the sky is the limit.
Since being deleted from the 2014 plan this has been increased twice, at least doubling the area, making it the largest new industrial allocation in any village in the area and with no evidence of need being produced. This sounds very much like another ‘punitive’ instance.

In any event there is absolutely no need to place new industrial sites in the Green Belt when there is available space at Slyfield. There are no special circumstances so it would appear to be contrary to MM9. Indeed, the Employment Land Needs Assessment showed a reduction in demand for industrial land.

This proposal is additional to the 25% enlargement at the ‘Send Business Centre’, in which case there will be a larger concentration in Send than any other village and crucially no evidence of demand. What is going on? Narrow, winding single-lane lanes around the Business Centre will lead to frequent gridlock. Nitrogen dioxide levels are already dangerous.

Attached documents:

Comment: MM42 - LPMM18/1652  Respondent: Shirley Bowerman 17308417  Agent:


The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads. The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

Attached documents:

Comment: MM44 - LPMM18/1649  Respondent: Shirley Bowerman 17308417  Agent:

MM44. Land at Aldertons Farm, Send Marsh Road. Policy A63.

This area for a proposed 120 homes was deleted from the 2014 plan and has since been increased twice, doubling the acreage involved. It was put back in until the public examination in July despite all the objections against and no evidence being produced in favour. Clearly another instance of ‘punishment’, which is not what the exercise is about.

If allowed, this development will severely detract from the heritage appeal of the beautiful Send Marsh Green which it adjoins and which has lited buildings on all three sides. It will also detract from the attractiveness of the listed Aldertons Farm and its neighbouring Old Hall and constitute a raised eyesore and drainage problems to the properties on the north side of Send Marsh Road opposite this site.

The considerable resulting traffic will create serious problems at Mays Corner at the Send end of Send Marsh Road and will be a serious source of damage to the two 16th century timber-framed cottages between which Send Marsh Road makes a 90 degree bend. Traffic already sometimes backs up to Send Marsh Green on its way to the old Portsmouth Road and 120 extra homes will also make that problem very much worse. There have been a number of accidents already where the narrow road makes its 90 degree bend.
Together with Garlicks Arch (550), Clockbarn (90) and Winds Ridge (40), this site will result in 770 houses being added to the existing 1700 in Send. This is far too much for the infrastructure and will adversely affect the nature of this pleasant village to the detriment of the existing residents and visitors and passers through.

This is another Green Belt site with again no evidence of special circumstances, so it is contrary to MM9 and should be deleted.

This site and its surrounds are hugely popular with walkers and cyclists which the Plan aims to encourage, but extensive development such as is proposed here will greatly discourage them.

Attached documents:

Comment: MM48 - LPMM18/1653  Respondent: Shirley Bowerman 17308417  Agent:

Objection applying generally to MM27, MM41, MM42 & MM48. Transport Strategy,

The traffic implications for Send of Garlicks Arch, Burnt Common, Clockbarn and Aldertons when considered with nearby Gosden Hill and Wisley/Ockham are not sufficiently dealt with by the A3 changes and the Clandon slip-roads. The over-all effect of the total extra traffic on Send Barns Lane and Send Road does not appear to have been addressed, bearing in mind that thousands of extra cars and trade vehicles, combined with HGVs will be going to and from Woking every day, causing increased noise, pollution, delays and tail-backs.

Attached documents:

Comment: MM9 - LPMM18/1646  Respondent: Shirley Bowerman 17308417  Agent:

I live at Send Marsh in one of the most beautiful and delightful heritage spots in Surrey, albeit that access is already much hindered by traffic on the nearby Portsmouth Road and the A3 at one end of the hamlet and by the A247 through the village of Send at the other end. I am appalled by the total and contemptuous dismissal of the thousands of local objections to the previous plan and the literally punitive proposed increase in development of this area. I regret to say that it smacks more of the abuse of power by over-mighty autocratic rulers seen recently elsewhere in the world than of responsible local democracy in action in rural Surrey.

Specifically, I object as follows:

1) MM9 Green Belt Policy.

As everybody knows, the Green Belt is not supposed to be built on except in exceptional circumstances and no exceptional circumstances have been suggested here. Therefore this proposal appears to be illegal. The same would seem to apply to the device of removing areas from Green Belt protection and then proposing development.

Attached documents:

Comment: MM41 - LPMM18/46  Respondent: Mrs Neeley Jackson 17316257  Agent:
I am devastated at the proposed amount of houses planned here, as a lay person even i can see that there are no school or medical facilities that will support this development. Is there a proposal to address this? i imagine i already know the answer will be no. How on earth has Ripley primary school closed, Send is now full to capacity. Never mind the places for secondary school, Send already falls into a no mans land for high school places. The amount of extra cars this development will produce is unacceptable, Send Barns lane is already busy in the morning, parking around the school is ridiculous i walk my children to school and am concerned at the amount of nitrogen dioxide level at present never mind if this traffic were to get worse.

My main objections are

- No infrastructure to support development (school and health)
- environment impact on health
- excessive amount of houses planned

Attached documents:

Comment: MM41 - LPMM18/48  Respondent: Mrs Neeley Jackson 17316257  Agent:

My objections for this development are the same as MM41

The number of houses is excessive

- No infrastructure school or health. Send is no mans land for high schools, only one primary school for an increase of houses by 45%  It just do not make any sense.

- health - higher levels of vehicles = higher levels of Nitrogen Dioxide = more illness = more strain on health

- its green belt land, as MM41 it contradicts MM9

Attached documents:

Comment: MM42 - LPMM18/47  Respondent: Mrs Neeley Jackson 17316257  Agent:

This is unnecessary, there is brownfield land within the borough which can take this huge development. Why development on green belt land when there is already brownfield at Slyfield. This contradicts MM9

Send seems to be at the forefront of all the developments, being attacked from all angles, increase at Tannery Lane, Increase at Burnt common., where is the proven demand for such a unit?The roads cannot cope with the heavy loads, Send Barns Lane has been eroded by the large vehicles already.  As i have said previously as a resident with small school age children i am concerned about the nitrogen dioxide levels. there is a reason we moved out of london.

Attached documents:

Comment: MM27 - LPMM18/4439  Respondent: David Banham 17321089  Agent:
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, predominantly at peak times, causing increased noise, nitrogen dioxide pollution, delays and gridlock. Should you not think this is a problem I would invite you to recreate a commute from Send during rush hour times. I would not feel comfortable cycling with my children on the local roads should the proposed developments go ahead as the narrow roads, currently with no special provisions or lanes for cycling, will become too busy and dangerous to consider risking the lives of my children.

Attached documents:

Comment: MM41 - LPMM18/4432  Respondent: David Banham 17321089  Agent:

MM41 Land at Garlick’s Arch, Send Marsh, policy A43

- This is an increase of 37% in the number of houses proposed and is excessive
- 7000 objections to the previous lower number have been ignored and I am still waiting for any response to my previous objections.
- It is Green Belt containing ancient woodland.
- It will join up Send and Ripley and constitute over development.
- The site is subject to frequent flooding and contaminated by lead shot. Send MARSH is appropriately named.
- At least 800 extra cars will block up the adjacent roads, the majority of which will all be on the road within the same 2 hour period in the day.
- School and medical facilities will be strained to breaking point. With the closure of Ripley First School, the other local schools are already at or close to capacity with no plant to expand further in sufficient time.
- With Alderton’s (120), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure and constitutes rapid expansion that is out of line with any normalised growth in population or demand.
- There is no mention of using any of the local trades within the Send area to develop these properties thus not helping the area or cultivating pride in the local area at all.

Attached documents:

Comment: MM41 - LPMM18/4440  Respondent: David Banham 17321089  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine
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Attached documents:

Comment: MM42 - LPMM18/4435  Respondent: David Banham 17321089  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

- Since being deleted from the 2014 plan this has been increased twice, doubling the area.
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Traffic on arrow surrounding roads will significantly increase especially during peak times when the majority of vehicles will be using the roads leading to gridlocked. Additionally nitrogen dioxide levels are already dangerous and the additional disproportionate pollution from a large increase in vehicles in rush hour traffic will only degrade the air quality further.

- With may local trades in the area, they could be used to assist and in turn put something back into the local area but the plans makes no mention of this and will likely contract out the work to a large national or multi national developer who has little to no interest in the quality of the work or the local area.

Attached documents:

Comment: MM42 - LPMM18/4441  Respondent: David Banham 17321089  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, predominantly at peak times, causing increased noise, nitrogen dioxide pollution, delays and gridlock. Should you not think this is a problem I would invite you to recreate a commute from Send during rush hour times. I would not feel comfortable cycling with my children on the local roads should the proposed developments go ahead as the narrow roads, currently with no special provisions or lanes for cycling, will become too busy and dangerous to consider risking the lives of my children.
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<td><strong>MM9 Green Belt Policy</strong></td>
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<td>Although the “modification” claim to protect the Green Belt except in very special circumstances, GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.</td>
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This shows no respect or preservation of the local village history and way of life. There are many listed properties in the village of Send that have been listed and preserved to maintain the heritage of the village and the English countryside. I do not see how you can trample over the village history and Green Belt while still having Listed buildings.

The development will also have a large negative impact on the local wildlife, some of which are legally protected such as the local barn owls adjacent to and on my property. The increase in the local human population will scare off the resident woodpeckers, dears, badgers, moles and other local British wildlife.

**Attached documents:**

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**Comment:** MM13 - LPMM18/5036  **Respondent:** Adrian Wise 17327329  **Agent:**

MM13 – why has the retail allocation in the town centre not been revised to take account of modern retail trends? Surely any plan should have allocated town centre housing to provide footfall as others have done else we shall see a dead town centre in the not too distant future.

**Attached documents:**

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**Comment:** MM2 - LPMM18/5022  **Respondent:** Adrian Wise 17327329  **Agent:**

MM2 - the figures used to create Guildford’s OAN are wrong and out of date. Per the NPPF the most up to date figures must be used. In GBC’s case these figures have changed greatly, not moderately, because of the drop in immigration and the error in the previous households projection figures around university towns. The extent of these changes, I estimate well over a 30% reduction in housing need arises, makes the whole basis of the local plan housing target wrong. This can only be properly addressed by reopening the public enquiry.

...  
MM2 - there is no longer any need for Guildford to take any of Woking’s unmet need as Woking no longer has any such unmet need – there targets too when per the NPPF are assessed using the latest housing projections have fallen by a large amount.

...  
MM2 - the council’s declared spatial strategy is first to maximise development in the town centre, then the urban area, then brownfield sites, then land in the villages and finally Green Belt. This policy has not been followed, e.g. Town Centre development has been widely disregarded, so the plan can only be ‘found sound’ when the council can demonstrate that it has been followed. The inquiry should be reopened once the council has done this part of its planning correctly.

...  
MM2 – there has been no proper heed taken of the need for affordable housing and particularly social rented housing. Nearly all the housing need in Guildford is in fact for such dwellings whereas the plan is simply to build houses anywhere to meet the OAN. Inevitably many of these houses will be unnecessary large houses as they will be built in inappropriate places, remote Green Belt sites, for affordable and social rented homes. To build affordable houses in such places would render them unsustainable. The plan should be reopened once the council has done its duty and properly allocated sufficient appropriate sites for these purposes.
Comment: MM41 - LPMM18/5039  Respondent: Adrian Wise 17327329  Agent:

MM41 – the transport strategy is entirely unreliable. There is a great dependence on A3 improvements around Guildford itself that are outwith the Council’s control – and I would venture so speculative given the financial position that these too must be disregarded. The assumptions round the J10 improvements are similarly speculative and have already since the enquiry been delayed by at least 5 years, wholesale changes are being debated and it is even possible the project will be shelved and a ‘smart motorway’ scheme implemented instead. No plan can be sound when it is based on such imponderables. The concept of new slip roads on the A3 at Burnt Oak will never get off the ground! Burnt Oak slips have been proposed before when they were rejected by the Highways authorities - the feeder roads cannot stand the extra traffic and the A3 cannot stand extra intersections for safety reasons.

Attached documents:

Comment: MM45 - LPMM18/316  Respondent: Mr Mike Dean 17328609  Agent:

I am very concerned about this particular development for a number of reasons:

• What are the "exceptional circumstances" that justify taking this site out of the Green Belt? I haven't been able to find them noted within the documents.

• I cannot find any justification within the documents for extending the Flexford settlement north of the railway line. What is that justification

• There is nothing within the plan to address infrastructure. The infrastructure in Glaziers Lane can barely cope with the existing housing. For instance:
  ◦ 103 Houses is going to mean about 200 more cars. Something like half of those are going to be on the move during peaks hours, going to work, taking children to school etc. This will just add to the chaos that all ready exists because Glaziers lane is a rat run off the A31 particularly when there has been an incident on the A31.
  ◦ Already sewage, water and electricity struggles to cope with existing needs.
  ◦ The area is already prone to flooding.
  ◦ the railway bridge at Wanborough station is already significantly damaged. This will be exacerbated by the additional cars and construction traffic.
  ◦ The doctor's surgery can barely cope with existing needs without the perhaps 400 additional inhabitants.
  ◦ Where will the children go to school?

• what is the benefit of this development to Normandy? None as far as I can see.

• I understand that this revised plan does not mean any more houses but bring forward a number 0 houses within the plan period. If that is so then the original plan will have identified appropriate sites. If that is the case why is it not possible to bring forward one of these site? Site A64 was not in the original plan.

• I have read in the Surrey Advertiser that the plan significantly over estimates the housing requirement. If that is the case why is this being considered at all?

Attached documents:
Comment: MM2 - LPMM18/1116  Respondent: Gail Wicks 17328641  Agent:  

Policy S2

The Public Examination figure being used by Guildford Borough Council for housing need being used by the Inspectorate is 789 houses per year. There was a front page spread in the Surrey Advertiser two weeks ago about the new figures from the population forecasts from the Statistics Office states that Guildford can achieve its growth with 460 houses per year. There has also been a survey published by a prominent consultancy firm, Barton Willmore stating that the growth can be achieved with 431 houses per year.

This must be taken into consideration and the housing numbers lowered throughout the Borough, including Send.

Attached documents:

Comment: MM27 - LPMM18/1112  Respondent: Gail Wicks 17328641  Agent:  

MM27, MM41, MM42 and MM48 Transport Strategy

Guildford Borough Council want to implement changes to the A3 with a slip road south at Burnt Common/Clandon. This does not take into account the massive impact on Send Barns Lane and Send Road as thousands more cars and lorries etc head to Woking every day from the added nearby sites including Wisley and Gosden Hill. This will mean increased pollution, noise, delays and gridlock on these already busy roads. The rush hour will be intolerable as it is now when there is a problem on the A3 or M25.

Attached documents:

Comment: MM41 - LPMM18/1109  Respondent: Gail Wicks 17328641  Agent:  

MM41 Land at Garlicks Arch, Send Marsh, Policy no. A43

This again is the Green Belt and is ancient woodland which is prone to flooding and is contaminated land.

The Increase in the number if houses from 400 to 550 with 450 to be built in the first five years, represents a 37% increase and is excessive.

The large numbers of objections to the previous lower number appear to have been ignored.

Send and Ripley are separate villages each with their own entity, this over-development will join the two villages together. We do not want to be the village of Send, Send Marsh and Ripley with all the tribulations of one parish council etc.

At the moment there is one medical centre for the villages of Send, Send Marsh, Ripley and Clandon the strain on the doctors and medical facilities will cause immeasurable problems.

Strangely enough Surrey County Council and the Diocese have taken the measure of closing Ripley Primary School, Toad Hall is closing at Christmas and Ripley Pre School is also likely to close at the end of the academic year. Where is the school for the primary age children in this development? Send and Clandon Schools are already at straining point.
Again no thought has been given to the pressure of roughly an additional 800 cars on our roads causing additional pollution and putting pressure on other roads in the area.

Attached documents:

Comment: MM41 - LPMM18/1113  Respondent: Gail Wicks 17328641  Agent:

**MM27, MM41, MM42 and MM48 Transport Strategy**

Guildford Borough Council want to implement changes to the A3 with a slip road south at Burnt Common/Clandon. This does not take into account the massive impact on Send Barns Lane and Send Road as thousands more cars and lorries etc head to Woking every day from the added nearby sites including Wisley and Gosden Hill. This will mean increased pollution, noise, delays and gridlock on these already busy roads. The rush hour will be intolerable as it is now when there is a problem on the A3 or M25.

Attached documents:

Comment: MM42 - LPMM18/1110  Respondent: Gail Wicks 17328641  Agent:

**MM42 Land at Burnt Common, London Road, Send, Policy No. A 58**

This policy was taken out of the 2014 plan and has since been re-inserted and the area has been increased twice from 7000 sq metres to 14,800 sq metres.

Slyfield has unused capacity so there is no need to have a new industrial site on the Green Belt. It also contradicts MM9 because there are no special circumstances.

Send Business Centre in Tannery Lane is being increased by 25% yet the Employment Land Needs Assessment showed a reduction in demand for industrial land. This is a huge concentration in Send with no proven demand.

Also yet again the narrow surrounding roads with be gridlocked and the pollution, which is already high, will be increased.

Attached documents:

Comment: MM42 - LPMM18/1114  Respondent: Gail Wicks 17328641  Agent:

**MM27, MM41, MM42 and MM48 Transport Strategy**

Guildford Borough Council want to implement changes to the A3 with a slip road south at Burnt Common/Clandon. This does not take into account the massive impact on Send Barns Lane and Send Road as thousands more cars and lorries etc head to Woking every day from the added nearby sites including Wisley and Gosden Hill. This will mean increased pollution, noise, delays and gridlock on these already busy roads. The rush hour will be intolerable as it is now when there is a problem on the A3 or M25.
Objections to changes to the Guildford Local Plan

I am writing regarding the recent changes to the Guildford Local Plan and the devastating effect the changes will have on the village of Send. I would like you to consider my objections and those of many others who are extremely upset at the way Send, in particular, is being treated.

MM44 Land at Aldertons Farm, Send Marsh Road, Policy No. A63

The proposal to build 120 homes on this Green Belt land with no special circumstances I believe contradicts Policy MM9.

The pressure of the additional traffic at Send Crossroads and through the village of Send and Send Marsh will be intolerable.

This item was removed from the local plan because of the numerous objections but then re-inserted in the July version for public examination with no satisfactory reason for the change.

The building of so many houses will detract from the beauty of the heritage buildings surrounding Send Marsh Green and totally spoil this idyllic area.

Attached documents:

MM27, MM41, MM42 and MM48 Transport Strategy

Guildford Borough Council want to implement changes to the A3 with a slip road south at Burnt Common/Clandon. This does not take into account the massive impact on Send Barns Lane and Send Road as thousands more cars and lorries etc head to Woking every day from the added nearby sites including Wisley and Gosden Hill. This will mean increased pollution, noise, delays and gridlock on these already busy roads. The rush hour will be intolerable as it is now when there is a problem on the A3 or M25.

Attached documents:

MM9 Green Belt Policy

Guildford Borough Council claim to be protecting the Green Belt except in very special circumstances yet make an exception for limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village. This is very subjective and means that there is no protection of the Green
Belt. Any land at the edge of our village could be used for development. This is an open invitation to developers and speculators at the expense of the villagers.

Attached documents:

**Comment: Other comments** - LPMM18/1117  **Respondent: Gail Wicks 17328641**  **Agent:**

**Other developments**

The Clockbarn site has been increased to 65 houses. There are to be 40 houses and 2 travellers’ sites in Send Hill. A 25% increase in the Send Business Centre despite the Wey Conservation Area. The impact on this village is unreasonable.

Attached documents:

**Comment: MM32** - LPMM18/2062  **Respondent: Aviva Investors (Helen Rainsford) 17328705**  **Agent: Q+A Planning Ltd (Mr Peter Keenan)**

On behalf of our client, we are supportive of the allocation of this site for a mixed-use redevelopment to include residential. However, we have the following comments on the drafting of Policy A60.

1. We consider that the word ‘comparison’ should be omitted from the retail floorspace reference in the allocation. Whilst our client’s intention would be to provide comparison floorspace, making the allocation specific to the comparison category would be inconsistent with the requirements section, that simply refers to ‘retail uses on the ground floor with active frontages’.

2. We object to the ‘requirement’ to ‘Retain the existing walk-through from North Street to the High Street’. In our view, the extent to which such a walk through is retained in such a development is more properly judged through an urban design analysis through other policies in the Plan (including new policy S3) that considers the options for development. Specifically, we note the following:
   - The walk through is not a public right of way
   - As far as we are aware, the walk through is not an explicit requirement of any previous planning permissions or conditions
   - There are other walk throughs available between North Street and the High Street
   - Applying a blanket insistence that this walk through should be retained is likely to curtail the ability of any development to provide larger, more commercially viable retail units on the ground floor as set out in the opportunities element of the policy.

3. Under the opportunities element, we consider that the Council should acknowledge the ability of the site to accommodate more than 50 dwellings should it be acceptable on townscape grounds and complies with other policies within the Plan. This reflects the requirements in new Policy S3 that ‘Schemes must demonstrate that they have made the most efficient use of land both in terms of the quantum of development and the mix of uses’

Attached documents:
Comment: MM27 - LPMM18/3973  Respondent: Andrew Hollis 17329025  Agent: MM27,MM41,MM42 and MM48 Transport Strategy

Most traffic will use the existing roads, which already in the rush hour when there is a problem with the A3 or M25 or where there are road works, causes huge hold ups  this will be a continuous traffic jam if the new developments go ahead

S2 Revision of Housing Need

The Statistics office states that Guildford can achieve its housing need with 460 houses per year. and the consultancy firm, Barton Willmore states that growth can be achieved with 431 houses per year. Yet Guildford Borough Council and the Inspectorate are intending to plan for 789 houses per year. This figure must be looked at again and reduced in line with the latest growth figures.

Attached documents:

Comment: MM41 - LPMM18/3969  Respondent: Andrew Hollis 17329025  Agent: MM41 Garlicks Arch

I object to the building of 550 homes and two traveller sites on the above land. The land gets flooded and is contaminated. The additional traffic this will cause will be an unbearable burden on the surrounding roads. Ripley school has already closed and the two nearest ie Clandon and Send are at bursting point. There is only one doctors surgery serving the three villages which again is always very busy.

Attached documents:

Comment: MM41 - LPMM18/3974  Respondent: Andrew Hollis 17329025  Agent: MM27,MM41,MM42 and MM48 Transport Strategy

Most traffic will use the existing roads, which already in the rush hour when there is a problem with the A3 or M25 or where there are road works, causes huge hold ups  this will be a continuous traffic jam if the new developments go ahead

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The Statistics office states that Guildford can achieve its housing need with 460 houses per year. and the consultancy firm, Barton Willmore states that growth can be achieved with 431 houses per year. Yet Guildford Borough Council and the Inspectorate are intending to plan for 789 houses per year. This figure must be looked at again and reduced in line with the latest growth figures.

Attached documents:

Comment: MM42 - LPMM18/3970  Respondent: Andrew Hollis 17329025  Agent:
MM42 Burnt Common Industrial Site.

The increase in this site from 7000 sq metres to 14800 sq metres is intolerable. There is unused space at Slyfield so why does Send have to have a massive industrial site in the village. The traffic from cars, lorries etc will be impractical on the present road system. The Send Business Centre has increased by 25% and there is a new Marina in Tannery Lane, Send.

Attached documents:

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Comment: MM42 - LPMM18/3975  Respondent: Andrew Hollis 17329025  Agent:

MM27,MM41,MM42 and MM48 Transport Strategy

Most traffic will use the existing roads, which already in the rush hour when there is a problem with the A3 or M25 or where there are road works, causes huge hold ups this will be a continuous traffic jam if the new developments go ahead

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The Statistics office states that Guildford can achieve its housing need with 460 houses per year. and the consultancy firm, Barton Willmore states that growth can be achieved with 431 houses per year. Yet Guildford Borough Council and the Inspectorate are intending to plan for 789 houses per year. This figure must be looked at again and reduced in line with the latest growth figures.

Attached documents:

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Comment: MM44 - LPMM18/3971  Respondent: Andrew Hollis 17329025  Agent:

MM44 Land at Aldertons Farm, Send Marsh

This area was taken out of the local plan and not re-instated until the July consultation. WHY?? 120 homes is too intensive for the village and will spoil the pretty and heritage buildings surrounding Send Marsh Green. Again too much traffic for the narrow country roads.

Attached documents:

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Comment: MM48 - LPMM18/3976  Respondent: Andrew Hollis 17329025  Agent:

MM27,MM41,MM42 and MM48 Transport Strategy

Most traffic will use the existing roads, which already in the rush hour when there is a problem with the A3 or M25 or where there are road works, causes huge hold ups this will be a continuous traffic jam if the new developments go ahead

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The Statistics office states that Guildford can achieve its housing need with 460 houses per year. and the consultancy firm, Barton Willmore states that growth can be achieved with 431 houses per year. Yet Guildford Borough Council and
the Inspectorate are intending to plan for 789 houses per year. This figure must be looked at again and reduced in line with the latest growth figures.

Attached documents:

Comment: MM9 - LPMM18/3972  
Respondent: Andrew Hollis 17329025  
Agent:  

MM9 Green Belt Policy

We are taking up the slack from Woking who are not building on the Green Belt. Why do we have to in Send? This policy will join us up with Ripley and Burpham (ie Gosden Farm proposal in Burpham). By the time you have finished there will be no Green Belt at all.

Attached documents:

Comment: MM15 - LPMM18/4982  
Respondent: Zurich Assurance Limited 17343361  
Agent: Barton Willmore LLP (Gary Stevens)

D. MM15: POLICY E3: MAINTAINING EMPLOYMENT CAPACITY AND IMPROVING EMPLOYMENT FLOORSPACE

26. Whilst CTI consider the designation of the Site as a LSES to be an unsound approach (as explained above), the proposed modification of Policy E3 through MM15 to allow additional flexibility and that other suitable B class employment uses are considered as part of the marketing exercise, rather than thereafter, is welcomed.

27. Should the Council continue to retain the proposed LSES designation, CTI are likely to bring forward a planning application, responding to the detailed policy requirements, to change the use of the Site to residential in any event.

Attached documents:

Comment: MM2 - LPMM18/4981  
Respondent: Zurich Assurance Limited 17343361  
Agent: Barton Willmore LLP (Gary Stevens)

GUILDFORD BOROUGH SUBMISSION LOCAL PLAN: STRATEGY AND SITES MAIN MODIFICATIONS (2018)
BROADFORD BUSINESS PARK, BROADFORD PARK, SHALFORD

1. We hereby submit these representations on behalf of our client, Zurich Assurance Limited c/o Columbia Threadneedle Investments (hereafter referred to as “CTI”), in response to the public consultation on the proposed “main modifications” to the Guildford Borough Submission Local Plan: Strategy and Sites (September 2018) (“the Submission Local Plan”).

A. SCOPE OF REPRESENTATIONS

2. Following a series of public hearing sessions on the Submission Local Plan held from 5 June to 5 July 2018, the interim conclusion of Inspector Jonathan Bore BA MRTPI DipUD was that the plan is ‘sound’ subject to main
modifications. Guildford Borough Council (“the Council”) has produced a set of main modifications to the plan, which are subject to a six-week period of public consultation ending on 23 October 2018.

3. These representations respond to the following proposed main modifications (including their unique reference number as set out within the Schedule of Proposed Main Modifications) that form part of the consultation:

i. MM2: Modifications to Policy S2: Planning for the borough – our spatial development strategy;

ii. MM15: Policy E3: Maintaining employment capacity and improving employment floorspace; and

iii. MM39, MM43, MM44 and MM45: Site allocations.

B. BACKGROUND AND CONTEXT

4. CTI have previously submitted representations in response to the two Regulation 19 consultations conducted by Guildford Borough Council (“the Council”) under the Town and Country (Local Planning) (England) Regulations 2012 in July 2016 and July 2017. These representations related to CTI’s landholding at Broadford Business Park, Broadford Park, Shalford GU4 8ED (“the Site”), which lies to the south of Guildford and is identified on the site location plan attached at Appendix 1. These representations outlined the unsuitability of the Site for ongoing employment use and, bearing in mind the severe need for new homes in the borough, a residential allocation should be included in the emerging Local Plan.

5. As part of the July 2016 Regulation 19 Local Plan consultation, the Site was designated under Policy A34 as being suitable to accommodate approximately 100 homes. This allocation was subsequently removed from the July 2017 version of the Submission Local Plan, with the Site instead being designated a ‘Locally Significant Employment Site’ (“LSES”). CTI wrote to the Council on 16 May 2017, prior to the publication of the plan for consultation, and submitted formal representations in July 2017, questioning the soundness of this approach and recommended that the LSES designation be removed and the residential site allocation reinstated.

6. In his letter of 23 March 2018, the Inspector identified several issues that CTI consider relevant to the Council’s decision to designate the Site as a LSES instead of allocating it for housing. The relevant paragraphs from the Inspector’s letter have been highlighted below for ease of reference.

7. Paragraphs 1 and 2 of Inspector Bore’s letter outlined concerns in relation to the Council’s approach to calculating objectively assessed housing need in the borough and the meeting of otherwise unmet housing need for other boroughs (most particularly Woking Borough Council as highlighted in CTI’s representations) in the Housing Market Area (“HMA”). Paragraph 3 goes on to express significant concerns about:

3. “…the proposed stepped housing trajectory which indicates that the plan will deliver much lower numbers of homes in its early years than are actually needed. This appears to be an unacceptable aspect of the plan and the Council needs to consider the steps that should be taken to improve housing delivery in the earlier years of the plan”.

8. Paragraph 5 of Inspector Bore’s is particularly relevant to the Site and the Council’s intention to designate, what are outdated hard-to-let commercial premises, as this LSES could instead positively contribute towards the borough’s urgent need for housing.

5. “Guildford is a location with conflicting demand for limited space from different land uses, but it is demonstrably clear that the major need is for new housing, so it is not apparent why the plan seeks to protect all employment land, floorspace and hotels. Should the plan not be encouraging housing to replace outdated hard-to-let commercial premises in Guildford town centre, and should the land use balance in the Employment Core policy be revisited? This is a key strategic issue given (a) the amount of Green Belt land that is proposed to be released; (b) the potential that a higher OAN will be identified and (c) the need to cater for unmet housing need in the HMA. Please can the Council produce a paper setting out what steps should be taken and policy revisions made to accommodate a greater amount of the housing growth in the town centre and on other eligible brownfield land including suitable employment land and hotels” [our emphasis].
9. Inspector Bore provided comments at paragraphs 27 and 28 in relation to the approach followed by the Council as part of the employment policies contained in the Submission Local Plan.

1. “Policy E1(1) which concerns the provision of new employment floorspace is actually a different policy from E1(2) to (11) which relate more closely to Policy E3, Employment Protection. The Council should consider reordering this set of policies.

2. Policy E2(1): having established these locations as key office and R&D sites, it is not appropriate to differentiate sequentially between them. If a requirement for additional floorspace arose from an operator at a strategic employment site, it would not be appropriate to “direct” the requirement to Guildford Town Centre or a transport interchange. This is not an effective policy and this element should be deleted. In addition, E2(3) places an unacceptable impediment to the expansion of business and enterprise. The resistance to changes of use of employment floorspace is not adequately justified in the light of housing need (see Key Question XXX above)”.

10. Further to the formal representations described above, CTI wrote to the Council on 29 March 2018 to remind them of the opportunity to resolve the Inspector’s comments and concerns through use of the Site for housing.

11. The Council has claimed in its response to the Inspector’s Initial Questions (GBC-LPSS-001) to the examination that the plan adopts a “brownfield first” approach. The proposed modifications, however, instead opt to release several additional greenfield Green Belt sites for housing, plus an additional urban site in Guildford town centre.

12. Set out below are CTI’s comments regarding the soundness this approach when it is considered that there are reasonable alternatives available in the form of the Site.

C. MM2: MODIFICATIONS TO POLICY S2: PLANNING FOR THE BOROUGH – OUR SPATIAL DEVELOPMENT STRATEGY

13. CTI welcomes and supports the proposed modifications to Policy S2(1) to (3) to increase housing delivery in the Borough throughout the plan period so to account for the unmet housing need arising from Woking Borough Council. CTI also continues to support the release of Green Belt land for residential development considering the severe housing needs in Guildford Borough.

14. To accommodate the additional housing arising from Woking Borough Council’s unmet housing need the modifications to the Spatial Strategy contained in Table S2b propose the allocation of the following additional sites for residential or residential-led mixed use development, combined with adjustments to the housing trajectory to reflect the revised delivery rates other already allocated sites. CTI’s representations focus on the inclusion of the additional Green Belt sites (listed below) not otherwise included in the Submission Local Plan.

- Site A60: White Lion Walk, High Street, Guildford = 50 homes and retail floorspace
- Site A61: Land at Aaron’s Hill, Godalming = 200 homes
- Site A62: Land at Hornhatch Farm, adjoining New Road, Chilworth = 80 homes
- Site A63: Land west of Alderton’s Farm, Send Marsh Road, Send = 120 homes
- Site A64: Land between Glaziers Lane and Strawberry Farm, Flexford = 105 homes

15. Sites A61-A64 (inclusive) have been identified as coming forward in the first five years of the Council’s Housing Trajectory (Appendix 0 of the main modifications).

16. Whilst the inclusion of an additional urban based site (Site A60) is no objected to in principle, concern is raised regarding the inclusion of four additional greenfield sites that are in the Metropolitan Green Belt.

17. Sustainable development as defined by paragraph 7 of the NPPF (2012) requires consideration to be given to the economic, social and environmental dimensions of development. Paragraph 83 of the National Planning Policy Framework (NPPF) (2012) 1 confirms that Green Belt boundaries should only be altered in “exceptional circumstances”. The Calverton Judgment 2 provides the most recent and relevant definition of exceptional circumstances. Having undertaken an assessment of housing needs, the local planning authority should review Green Belt and seek to meet housing needs through an assessment and judgement of the following elements:
i) The acuteness/intensity of the OAN/Housing Need (matters of degree may be important);

ii) The inherent constraints on supply/availability of land prima facie suitable for sustainable development;

iii) The consequent difficulties in achieving sustainable development without impinging on the Green Belt;

iv) The nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and

v) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

18. The Council’s selection of the four additional greenfield sites in the Green Belt is considered at odds with these principles.

19. The Site is ‘previously developed land’ ("PDL") in the Green Belt and occupied by five buildings that range between two and three stories in height, plus associated hardstanding for access and car parking. The buildings on the Site already have an impact on the Green Belt’s openness. It has been demonstrated through CTI’s representations that redevelopment of the Site for residential purposes would not have a materially greater impact on the Green Belt than the existing. Combined with ecological enhancements secured through any redevelopment, there would be an opportunity to improve the environmental credentials of the Site, as referred to in paragraph 7 of the NPPF (2012), which should weigh positively in favour of allocating the Site for residential purposes.

20. In relation to the economic dimension of sustainable development, in replacing the existing office floorspace with residential development, it should be noted that most of the Site is available for redevelopment from 2019 by way of vacant possession, with the remainder available as a second phase by 2022. As explained in CTI’s representations to the Regulation 19 consultation, the existing office floorspace on the Site is of poor quality and structural integrity of the buildings means that there is a in need of comprehensive redevelopment. Carrying out a standard office refurbishment would not be financially viable in this case given the inherent structural defects present in the existing building and poor rental returns for office buildings in this location. Furthermore, the Site’s location and poor access to public transport and major highway infrastructure make it unappealing to potential investors, meaning that a suitable refurbishment or redevelopment programme is unlikely to come forward. It is therefore likely that the existing office buildings will further deteriorate during the plan period and become increasingly unlettable.

21. As set out in paragraph 22 of the NPPF (2012), “planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”. As the Inspector has rightly pointed out, preserving poor quality, unviable sites such as this for employment use, which would require comprehensive refurbishment and investment to bring to market, rather than taking the opportunity to deliver a more longterm sustainable solution such as additional housing, is misguided and fails to comply with the principles of sustainable development and core objectives of the NPPF.

footnotes 1 As the Submission Local Plan was submitted for examination in December 2017, the transitional arrangements set out in paragraph 214 of the revised NPPF (2018) confirms that the plan should be examined against the 2012 NPPF.


22. In terms of the social dimension, the opportunity to deliver additional homes is a positive feature of achieving sustainable development. As noted above, most of the Site would benefit from vacant possession in 2019 with the remainder by 2022. A phased residential scheme could therefore come forward as early as 2020/21, which will positively contribute to the first five years of the Council’s housing supply. Including the Site instead of the additional greenfield sites that are proposed through the main modifications would not therefore have a detrimental effect on the Submission Local Plan’s housing trajectory.
23. CTI consider that the Council has failed to properly weigh the dimensions of sustainable development in deciding to allocate additional greenfield land from the Green Belt for residential development when there are reasonable alternatives available that would have a lesser impact on the Green Belt’s openness and purposes as defined by paragraph 80 of the NPPF (2012).

24. Having regard to the tests of ‘soundness’ set out in paragraph 182 of the NPPF (2012), CTI consider that the proposed main modifications to the Submission Local Plan cannot be considered as being “positively prepared”, “justified”, “effective” or “consistent with national policy”. As a result, the Submission Local Plan remains unsound.

25. To remedy this, the Council should review its proposed allocations and include additional urban or previously developed employment sites in Green Belt or countryside locations (such as the Broadford Business Park) that are known as being poor quality or in locations that are not sequentially preferable for such development.

3 See paragraph 4.9 of CTI representations to Regulation 19 consultation wherein it is noted that the Council recognised at paragraph 6.7 of the briefing note to Guildford Borough Council’s Borough, Employment and Infrastructure Advisory Board Committee, and repeated in the agenda papers for the Full Council meeting on 16 May 2017, that the Site is not sequentially preferable as a business location.

Attached documents:

**Comment:** MM39 - LPMM18/4984  **Respondent:** Zurich Assurance Limited 17343361  **Agent:** Barton Willmore LLP (Gary Stevens)

**E. MM39, MM43, MM44 AND MM45: SITE ALLOCATIONS**

28. As outlined under CTI’s response to MM2, the inclusion of these additional greenfield sites within the Green Belt, ahead of unsustainable and poor-quality existing employment sites is an unsound approach that does not conform to the tests of soundness set out in paragraph 182 of the NPPF (2012).

29. CTI therefore consider that the Council should re-evaluate its approach to the allocation of these four additional sites.

Attached documents:

**Comment:** MM43 - LPMM18/4985  **Respondent:** Zurich Assurance Limited 17343361  **Agent:** Barton Willmore LLP (Gary Stevens)

**E. MM39, MM43, MM44 AND MM45: SITE ALLOCATIONS**

28. As outlined under CTI’s response to MM2, the inclusion of these additional greenfield sites within the Green Belt, ahead of unsustainable and poor-quality existing employment sites is an unsound approach that does not conform to the tests of soundness set out in paragraph 182 of the NPPF (2012).

29. CTI therefore consider that the Council should re-evaluate its approach to the allocation of these four additional sites.

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29. CTI therefore consider that the Council should re-evaluate its approach to the allocation of these four additional sites.

F. SUMMARY AND CONCLUSION

30. CTI consider that the Council has failed to adopt a sustainable approach in identifying the additional site allocations that are proposed through this main modification consultation. As a result, the proposed do not comply with the tests of soundness described in paragraph 182 of the NPPF (2012).

31. We take this opportunity to remind the Council and the Inspector that the Site is available for residential development and offers scope to provide a meaningful contribution to the borough’s housing needs in the first 5 years of the plan period, something Inspector Bore has identified as a flaw with the originally submitted plan. We therefore recommend that the Council makes further modifications to the Submission Local Plan and reinstate the Broadford Business Park site as a residential site allocation as per the 2016 version of the Local Plan.

32. We trust that the Council and the Inspector will find these representations to be of use in drawing the examination in public to a close. Should any further information be required, please do not hesitate to contact us.

see attached for appendix

Attached documents:  🕒 Zurich Assurance Rep_Redacted.pdf (267 KB)
**MM41 Garlicks Arch:** I object in the strongest possible terms to these proposals, as this woodland is an extremely valuable local landscape feature, forming the backdrop in local views and walks, including views from our house and garden. All summer we have watched a family of buzzards flying above the woodland. We objected to the previous proposal for this area, and now it's even worse with many more houses. Any development here will also lead to increased run off and potential flooding downstream - i.e. where we live. As well as being beautiful, we understand it is also Green Belt and contains some ancient woodland, and therefore completely unsuitable for development. And the development would also add to the local traffic congestion.

**Attached documents:**

**Comment:** MM44 - LPMM18/3474 **Respondent:** Freya Risdon 17344865 **Agent:**

**MM44 Land at Alderton's Farm:** I object to this as it will increase the traffic locally, which is already far too high; also because it is Green Belt, and because the development will detract from the buildings around Send Marsh Green.

**Attached documents:**

**Comment:** MM1 - LPMM18/5868 **Respondent:** Thakeham Homes (Sarah Sutcliffe) 17345441 **Agent:**

**Re: Guildford Local Plan: Consultation of Main Modifications (MMs)**

These representations are made by Thakeham Homes Ltd (‘Thakeham’) in respect of the land interest at Manor Farm, West Horsley (‘the site’). It should be noted that Thakeham are members of the Guildford Housing Forum (GHF). As a result, these representations should be read in conjunction with those made by the GHF.

Thakeham have been involved in the Examination sessions for the Local Plan, both as members of the GHF and through the submission of Hearing Statements, where concerns were raised regarding the restrictive wording of Policy A38: Land to the west of West Horsley and the implications of certain aspects of Policy H1: Homes for All. Thakeham do not consider that the proposed Main Modifications (MMs) address these concerns, and this alongside wider issues may result in the Council being unable to demonstrate a deliverable supply of housing.

In accordance with additional Representations made on behalf of Thakeham, Thakeham remains of the view that the MMs are not appropriate and further work is therefore necessary to ensure that concerns can be addressed.

**Main Modification 1**

As established through the examination, there is a demonstrable need for additional housing sites to help contribute to meeting the identified housing target as set out in Policy S1 (MM1) The published MMs and additional site allocations have sought to address this need.

**Attached documents:**

**Comment:** MM1 - LPMM18/5930 **Respondent:** Thakeham Homes (Sarah Sutcliffe) 17345441 **Agent:**

**Re: Guildford Local Plan: Consultation of Main Modifications (MMs)**
These representations have been made by Thakeham Homes Ltd (‘Thakeham’) in respect of the land interest to the east of Chinthurst Lane, Shalford (‘the site’). In addition to these representations. It should be noted that Thakeham are members of the Guildford Housing Forum (GHF). As a result, these representations should be read in conjunction with those made by the GHF.

Thakeham have been involved in the Examination sessions for the Local Plan, both through their involvement in respect of the GHF but also through the submission of Hearing Statements in respect of the above site, where concerns were raised regarding the need for more housing allocations to meet the Borough’s housing need and implications of certain aspects of Policy H1: Homes for All and Policy D2: Sustainability design, construction and energy. Thakeham do not consider that the proposed Main Modifications address these concerns, and this alongside wider issues may result in the Council being unable to demonstrate a deliverable supply of housing.

In accordance with additional Representations made on behalf of Thakeham, Thakeham remains of the view that the MMs are not appropriate and further work is therefore necessary to ensure that concerns can be addressed.

Main Modification 1
As established through the examination, there is a demonstrable need for additional housing sites to help contribute to meeting the identified housing target as set out in Policy S1 (MM1). The published MMs and additional site allocations have sought to address this need.

Given the substantial shortfall which was identified throughout the examination hearings there is evidently a need for further housing sites and therefore Thakeham are supportive of the council’s intention to allocate additional sites for housing.

Sustainability Appraisal
In support of the MMs, the council has prepared a Sustainability Appraisal Addendum (SA Addendum), dated September 2018. This document sets out the Council’s selection of reasonable alternative sites and provides justification for the Council’s preferred approach.

As part of this approach, the SA Addendum presents seven options for additional housing scenarios. None of these options include the potential for land to the east of Chinthurst Lane, Shalford, as a legitimate reasonable alternative site. Thakeham considers that this approach is unjustified.

The site is discussed briefly within Box 5.2 of the SA Addendum:

‘There is one site – Land to the east of Shalford, Chinthurst Lane (175 homes) - which performs poorly relative to other village Green Belt sites discussed here. Whilst the site is within walking distance of Shalford railway station, and comprises ‘amber-rated’ Green Belt, it falls within the locally designated Area of Greater Landscape Value (AGLV) and the access road is considered unsuitable for the scale of development.’

The SA Addendum therefore recognises the sustainable nature of the site given its proximity to a local transport hub, alongside the site’s limited contribution to the function of the Green Belt. However, the site is then discounted due to its location within the locally designated AGLV and concerns regarding the ability to provide a suitable access to serve the proposed development.

We would suggest that the SA Addendum is flawed as it has failed to assess this site in any detail and has therefore prematurely discounted the site as a plausible possibility of delivering housing. Whilst the site is assessed as ‘amber-rated’ Green Belt and is therefore only considered to be a medium sensitivity location, the council have gone on to conclude that the site should be discounted due to its AGLV designation. This however ignores that the Local Plan evidence base where the Council’s Green Belt and Countryside Study Volume III (2013), notes that “the site is surrounded by defensible boundaries”, and is therefore considered to perform a limited landscape function.

In addition, the council have concluded that the access road is considered unsuitable for the scale of development proposed. However, the council have limited evidence to support this conclusion and do not appear to have assessed opportunities for this constraint to be overcome through future proposals. In our view, this would not be a constraint to development. The site has a significant amount road frontage along its western boundary and it is therefore anticipated
that there is sufficient opportunity for appropriate highway upgrades allowing a suitable access to be achieved to support the delivery of the site for approximately 200 dwellings.

This site could therefore deliver much needed housing in the short term within walking distance of local facilities and would therefore provide a suitable extension to the existing built up area with a minimal landscape impact.

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. We have appended to this representation an indicative site plan without constraints to illustrate where development could potentially be delivered on the site.

We trust that these representations will be useful and clear, and we would be grateful of confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

see attachment for appendix

Attached documents: Thakeham Homes Rep 3 Redacted.pdf (4.8 MB)
inset village boundaries are protected by the Green Belt designation so have not been considered for further protection. Land of public value in inset villages that is used for sport and recreation is identified through the Open Space Sport and Recreation Assessment and will be protected in line with the NPPF.’

Following a site visit and basic desktop assessment, the Amenity Assessment 2017 deemed the site (Ref: ETH_088) had an amenity value score of ‘High’, accompanied by the following reasoning:

‘Site is a grass field which is inaccessible to the public. The site is adjacent to a private sports centre. There is also a PROW along the southern boundary. The site is in an elevated position and offers aesthetic value.’

The site is private land which is inaccessible to the public and therefore has no amenity value with respect to providing opportunities for sports and recreations. It therefore appears that this site has been designated solely due to its considered ‘aesthetic value’ and that as a result the overall amenity value is scored as ‘High’. This is the only basis upon which the site is designated as Open Space under proposed Policy ID4.

As set out in previous representations, the site is well contained by high hedgerow to its southern boundaries adjacent to the public footpath, and is set substantially back from the road frontage of Chinthurst Lane. Due to the location and positioning of the site, there are very limited views towards the site from the public realm on Chinthurst Lane and further afield. The elevated position of the site means any views into the site from the tennis club are limited. The only views into the land are from private properties at first floor level, and limited views from the private sports club. To demonstrate the minimal visual amenity value of this site, we have again appended a series of images at Appendix 2 which accompanied representations made in July 2016. These images show that the site is not visible from the public footpath, with the exception of over the entrance gate, and that there is very limited visibility towards the site from the public realm on Chinthurst Lane or the sports club.

We object to the conclusion within the Amenity Assessment that this site is of high amenity value and we consider that the proposed allocation of the land as Open Space should be removed from the Local Plan.

The designation of sites of no amenity value is not consistent with the NPPF and does not constitute positive planning and would seriously compromise the ability of the Borough to provide much needed housing in sustainable locations within the villages and towns.

This site is set within a highly sustainable location in the village and would be suitable for residential development in the emerging plan period. Sites such as this within the village envelope can make an important contribution to meeting housing needs in the locality.

We trust that these representations will be useful and clear, and we would be grateful of confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

see attachment for appendix

Attached documents: Thakenham Homes Rep 2 Redacted.pdf (655 KB)
location in relation to Godalming and its relationship to the emerging proposed allocation in the Waverley Local Plan Part 2.

The Waverley Local Plan is not however far advanced, currently at preferred options stage. It cannot therefore be given weight in determining the suitability of the site. The relevant proposed allocation has also been submitted as a planning application, but this is not decided and is currently the subject of several environmental concerns and consultation objections. Adoption of the Waverley Local Plan is not anticipated until late 2019, and prior to approval of the above-mentioned site (if this should be achieved) the comprehensive design requirements of a cross boundary site under separate applications and the delivery of infrastructure across multiple Council’s should only hinder the delivery of the site. The delivery of a site of this size within the first 5 years of the plan with these delivery constraints is therefore unlikely and its inclusion would make the plan unsound.

see attachment for appendix

Attached documents:  Thakenham Homes Rep_Redacted.pdf (2.6 MB)

Comment: MM4 - LPMM18/5871 Respondent: Thakeham Homes (Sarah Sutcliffe) 17345441 Agent:

Policy H1: Homes for all (Main Modifications 4 & 5)

In addition to the above, MMs proposed in respect of Policy H1: Homes for All, do not address previous concerns raised through representations regarding the soundness of the policy stipulations in respect of self-build and custom homes.

Policy H1(3) stipulated requirements for accessible homes on housing sites. It is not considered that sufficient sound justification has been provided to support policy requirements for 10% Building Regulations M4(2) category 2 standard 'accessible and adaptable' and 5% of new homes meeting Building Regulations M4(3)(b) category 3 wheelchair user accessible dwellings standard.

Whilst as stated previously, we support the provision of policies to ensure housing size, type and tenure of homes required for different groups in the community are provided, Planning Practice Guidance is clear that evidence is required to demonstrate need and viability prior to implementing these standards.

The 2017 SHMA provides some justification regarding the need for accessible homes and indicates a projected increase in the number of people with long-term health problems or disability, whilst also indicating a requirement for 8% of the housing need to cater for specialist housing for older persons, such as sheltered extra care housing.

Our position therefore remains the same, and whilst we generally support the delivery of residential units to meet the needs of the ageing population and those with health needs, there has been little justification within the Local Plan evidence base to support the proposed total level of 15% of new homes as indicated in policy H1.

In addition, whilst a need has been identified within the Borough, particularly for the needs of older people, there is little justification as to whether all sites would be suitable for this need depending on size, location and need within a particular area. For village sites such as Land west of West Horsley, 15% provision for accessible and adaptable dwellings may not be justified by need within the area.

Policy H1(9) continues to stipulate requirements for self-build and custom homes on housing sites. The policy requirement of 5% on development sites of over 100 homes or more to be made available for sale as self-build and custom housing building has not been justified. As discussed above in regard to accessible units, need for self-build and custom homes needs to be justified within the council’s evidence base to ensure a sound basis for any policy.
Site allocation A38 also includes a requirement for ‘some self-build and custom house building plots’. As above, this requirement needs to be justified in the council’s evidence base. In our view, these policy requirements for a proportion of self-build and custom housing plots on all sites is not a feasible approach.

We trust that these representations will be useful and clear, and we would be grateful of confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

**Comment:** MM5 - LPMM18/5872  **Respondent:** Thakeham Homes (Sarah Sutcliffe) 17345441  **Agent:**

**Policy H1: Homes for all (Main Modifications 4 & 5)**

In addition to the above, MMs proposed in respect of Policy H1: Homes for All, do not address previous concerns raised through representations regarding the soundness of the policy stipulations in respect of self-build and custom homes.

Policy H1(3) stipulated requirements for accessible homes on housing sites. It is not considered that sufficient sound justification has been provided to support policy requirements for 10% Building Regulations M4(2) category 2 standard ‘accessible and adaptable’ and 5% of new homes meeting Building Regulations M4(3)(b) category 3 wheelchair user accessible dwellings standard.

Whilst as stated previously, we support the provision of policies to ensure housing size, type and tenure of homes required for different groups in the community are provided, Planning Practice Guidance is clear that evidence is required to demonstrate need and viability prior to implementing these standards.

The 2017 SHMA provides some justification regarding the need for accessible homes and indicates a projected increase in the number of people with long-term health problems or disability, whilst also indicating a requirement for 8% of the housing need to cater for specialist housing for older persons, such as sheltered extra care housing.

Our position therefore remains the same, and whilst we generally support the delivery of residential units to meet the needs of the ageing population and those with health needs, there has been little justification within the Local Plan evidence base to support the proposed total level of 15% of new homes as indicated in policy H1.

In addition, whilst a need has been identified within the Borough, particularly for the needs of older people, there is little justification as to whether all sites would be suitable for this need depending on size, location and need within a particular area. For village sites such as Land west of West Horsley, 15% provision for accessible and adaptable dwellings may not be justified by need within the area.

Policy H1(9) continues to stipulate requirements for self-build and custom homes on housing sites. The policy requirement of 5% on development sites of over 100 homes or more to be made available for sale as self-build and custom housing building has not been justified. As discussed above in regard to accessible units, need for self-build and custom homes needs to be justified within the council’s evidence base to ensure a sound basis for any policy.

Site allocation A38 also includes a requirement for ‘some self-build and custom house building plots’. As above, this requirement needs to be justified in the council’s evidence base. In our view, these policy requirements for a proportion of self-build and custom housing plots on all sites is not a feasible approach.

We trust that these representations will be useful and clear, and we would be grateful of confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

**Attached documents:**
**Policy A38: Land west of West Horsley**

Thakeham remains fully supportive of the proposed allocation of this site under emerging policy A38. However as set out in our previous representations and hearing statements we do not consider that the overall quantum of development proposed has been established appropriately, and it is therefore our view that the restrictive wording of the policy could result in an inability to develop the site in the most efficient and comprehensive way.

Given the substantial shortfall which was identified throughout the examination hearings there is evidently a need for further housing sites and therefore Thakeham are supportive of the council’s proposals to allocate additional sites for housing. However, to ensure a robust approach to housing delivery the Council should also review existing proposed allocations and the wording of the associated policies to ensure that these sites can deliver housing in a comprehensive way to assist in meeting housing need in the Borough.

In the case of Policy A38: Land west of West Horsley, whilst the policy does allow for some flexibility in quantum: ‘The site is allocated for approximately 135 homes’, the council could ensure that this does not restrict the quantum of development significantly by amending to: ‘The site is allocated for a minimum of 135 homes’.

**Attached documents:**

**Comment: MM25 - LPMM18/5098**  **Respondent: R & R Connor 17359489**  **Agent:**

MM25(Heritage Assets), in our opinion the new wording is very vague and offers no guidance to protecting a heritage asset. The original wording was more specific and therefore offers vital guidance and protection. There is also NO mention of consulting from the appropriate heritage societies, very worrying as the Council will not have to bother to seek information that could protect such unique assets.

**Attached documents:**

**Comment: MM3 - LPMM18/4638**  **Respondent: R & R Connor 17359489**  **Agent:**

MM3-POLICY S3

GBC must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3-POLICY S3 Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3-POLICY S3 GBC should adopt Guildford Vision Group’s proposals including the new crossing or equivalent alternative, to deliver a safer pedestrianised town centre with transport resilience and opened riverside.

MM23-POLICY D1 GBC, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as Planning authority.

**Attached documents:**

**Comment: MM6 - LPMM18/5096**  **Respondent: R & R Connor 17359489**  **Agent:**
MM6, 4a:

Relates to developers claiming they can’t provide the required amount of affordable housing because it would not be economically viable, USED to state:

‘MAY consider the following to assist with delivering a scheme...’

Now it says ‘WILL’

We feel strongly that it should revert back to the original word of ‘MAY’, as this enables GBC to achieve the required and vital amount of affordable housing.

Developers are already producing the minimal or none of this category and always looking for loopholes. Changing this word would make another one.

Attached documents:

Comment: MM27 - LPMM18/2290  Respondent: T Hodkinson 17370209  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

Opening new entry/exit slip roads off the A3 will overload Send Village, Send Barns Lane and Send Road with unacceptable levels of vehicular traffic. A lot of it HGV. The road network is unsuitable for this level of traffic and will give rise to unacceptable levels of pollution of all types. I therefore OBJECT.

Attached documents:

Comment: MM41 - LPMM18/2288  Respondent: T Hodkinson 17370209  Agent:

Re Guildford Local Plan Modifications Send/Burnt Common Area

Further to my letter dated 20th July 2017 and the proposed 2018 subsequent Modifications to the Guildford Local Plan.

The Main Modification Strategy Statement says "...plays an important part in shaping Guildford's future and how towns and villages develop whilst protecting and enhancing our natural enviroment".

Well, not for Send is this true,...in fact quite the opposite. MM41/Policy A43 : MM42/Policy A58: MM44/Policy A63: MM41,MM42 and MM48 Transport Strategy will be to the considerable detriment of Send and its environs.

As a result of The Planning Inspector's Report GBC have proposed Modifications that totally ignore the thousands of written objections. To add insult to injury have actually increased housing numbers and industrial/storage development in Send. This is a kick in the teeth for all local residents.

MM41/Policy A43 Land at Garlick's

I OBJECT to the Modification proposing an additional 150 houses This will put a further strain on local roads and medical facilities.

Attached documents:
Comment: MM41 - LPMM18/2291  Respondent: T Hodkinson 17370209  Agent: 

MM27, MM41, MM42 and MM48 Transport Strategy

Opening new entry/exit slip roads off the A3 will overload Send Village, Send Barns Lane and Send Road with unacceptable levels of vehicular traffic, a lot of it HGV. The road network is unsuitable for this level of traffic and will give rise to unacceptable levels of pollution of all types. I therefore OBJECT.

Attached documents:

Comment: MM42 - LPMM18/2289  Respondent: T Hodkinson 17370209  Agent: 

MM42/Policy A58 Land at Burnt Common

This modification is an absolute catastrophe. It's impact cannot be overstated. The traffic noise and pollution will transform the environment of Send.

I OBJECT to the new allocation of a further 7800 sq m of Industrial or warehousing space on this site.

This is a massive over allocation of land in the Green Belt for B1c, B2 and B8 usage.

Attached documents:

Comment: MM42 - LPMM18/2292  Respondent: T Hodkinson 17370209  Agent: 

MM27, MM41, MM42 and MM48 Transport Strategy

Opening new entry/exit slip roads off the A3 will overload Send Village, Send Barns Lane and Send Road with unacceptable levels of vehicular traffic, a lot of it HGV. The road network is unsuitable for this level of traffic and will give rise to unacceptable levels of pollution of all types. I therefore OBJECT.

Attached documents:

Comment: MM48 - LPMM18/2293  Respondent: T Hodkinson 17370209  Agent: 

MM27, MM41, MM42 and MM48 Transport Strategy

Opening new entry/exit slip roads off the A3 will overload Send Village, Send Barns Lane and Send Road with unacceptable levels of vehicular traffic, a lot of it HGV. The road network is unsuitable for this level of traffic and will give rise to unacceptable levels of pollution of all types. I therefore OBJECT.

I trust my concerns will be taken into account this time around.

Attached documents:
Comment: MM27 - LPMM18/4797  Respondent: Nicola Banham 17380161  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, predominantly at peak times, causing increased noise, nitrogen dioxide pollution, delays and gridlock. Should you not think this is a problem I would invite you to recreate a commute from Send during rush hour times. I would not feel comfortable cycling with my children on the local roads should the proposed developments go ahead as the narrow roads, currently with no special provisions or lanes for cycling, will become too busy and dangerous to consider risking the lives of my children.

Attached documents:

Comment: MM41 - LPMM18/4790  Respondent: Nicola Banham 17380161  Agent:

MM41 Land at Garlick’s Arch, Send Marsh, policy A43

- This is an increase of 37% in the number of houses proposed and is excessive
- 7000 objections to the previous lower number have been ignored and I am still waiting for any response to my previous objections.
- It is Green Belt containing ancient woodland.
- It will join up Send and Ripley and constitute over development.
- The site is subject to frequent flooding and contaminated by lead shot. Send MARSH is appropriately named.
- At least 800 extra cars will block up the adjacent roads, the majority of which will all be on the road within the same 2 hour period in the day.
- School and medical facilities will be strained to breaking point. With the closure of Ripley First School, the other local schools are already at or close to capacity with no plan to expand further in sufficient time.
- With Alderton’s (120), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure and constitutes rapid expansion that is out of line with any normalised growth in population or demand.

- There is no mention of using any of the local trades within the Send area to develop these properties thus not helping the area or cultivating pride in the local area at all.

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, predominantly at peak times, causing increased noise, nitrogen dioxide pollution, delays and gridlock. Should you not think this is a problem I would invite you to recreate a commute from Send during rush hour times. I would not feel comfortable cycling with my children on the local roads should the
proposed developments go ahead as the narrow roads, currently with no special provisions or lanes for cycling, will become too busy and dangerous to consider risking the lives of my children

Attached documents:

Comment: MM42 - LPMM18/4791  Respondent: Nicola Banham 17380161  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58
- Since being deleted from the 2014 plan this has been increased twice, doubling the area.
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Traffic on our surrounding roads will significantly increase especially during peak times when the majority of vehicles will be using the roads leading to gridlocked. Additionally nitrogen dioxide levels are already dangerous and the additional disproportionate pollution form a large increase in vehicles in rush hour traffic will only degrade the air quality further.
- With may local trades in the area, they could be used to assist and in turn put something back into the local area but the plans makes no mention of this and will likely contract out the work to a large national or multi national developer who has little to no interest in the quality of the work or the local area.

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, predominantly at peak times, causing increased noise, nitrogen dioxide pollution, delays and gridlock. Should you not think this is a problem I would invite you to recreate a commute from Send during rush hour times. I would not feel comfortable cycling with my children on the local roads should the proposed developments go ahead as the narrow roads, currently with no special provisions or lanes for cycling, will become too busy and dangerous to consider risking the lives of my children

Attached documents:

Comment: MM44 - LPMM18/4461  Respondent: Nicola Banham 17380161  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63
- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green belt site with no special circumstances so it contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure at the Send Crossroads and the already congested junction of Send Marsh Road and Portsmouth Road
- With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure to handle.

Attached documents:

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**Comment:** MM48  -  LPMM18/4477  **Respondent:** Nicola Banham 17380161  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, predominantly at peak times, causing increased noise, nitrogen dioxide pollution, delays and gridlock. Should you not think this is a problem I would invite you to recreate a commute from Send during rush hour times. I would not feel comfortable cycling with my children on the local roads should the proposed developments go ahead as the narrow roads, currently with no special provisions or lanes for cycling, will become too busy and dangerous to consider risking the lives of my children.

Attached documents:

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**Comment:** MM9  -  LPMM18/4494  **Respondent:** Nicola Banham 17380161  **Agent:**

MM9 Green Belt Policy

Although the “modification” claim to protect the Green Belt except in very special circumstances, GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

This shows no respect or preservation of the local village history and way of life. There are many listed properties in the village of Send that have been listed and preserved to maintain the heritage of the village and the English countryside. I do not see how you can trample over the village history and Green Belt while still having Listed buildings.

The development will also have a large negative impact on the local wildlife, some of which are legally protected such as the local barn owls adjacent to and on my property. The increase in the local human population will scare off the resident woodpeckers, dears, badgers, moles and other local British wildlife.

Attached documents:
Comment: MM41 - LPMM18/5705  Respondent: Madeleine Stevens 17381601  Agent:

Re: Guildford Local Plan: Strategy and Sites – Main Modifications 2018

I am very concerned that the objections of local residents have not been listened to and I’m worried that the traffic and pollution implications of your proposals are completely unacceptable.

I object to MM41 - Policy A43 at Garlick’s Arch to build a large housing estate with what now appears to be 550 houses. This is an greater number of new houses for our village to acquire than before causing over-development and changing the character of our village for ever. This will join up the villages of Ripley and Send and erode our beautiful greenbelt land. It will increase pollution levels as there will be so much more traffic on our roads blocking them up. As well as this, it is another area in Send that is subject to frequent flooding and has currently a flood zone 2 allocation. Removing it from greenbelt and building on it would completely destroy the beautiful ancient woodland dating back to Tudor times.

Attached documents:

Comment: MM42 - LPMM18/5706  Respondent: Madeleine Stevens 17381601  Agent:

I object to MM42 - Policy A58 at Burnt Common. I do not see why an industrial development is required when there are empty sites and industrial units at Slyfield and in Guildford especially when the Employment Land Needs Assessment showed a reduction in demand for industrial land. This is on top of the increase in Send.

Attached documents:

Comment: MM44 - LPMM18/5707  Respondent: Madeleine Stevens 17381601  Agent:

I object to MM44 – Land at Alderton’s Farm, Send Marsh Road - Policy A63 – the new site for 120 homes. I object to this chiefly on the grounds that it is greenbelt land with no special circumstances and it contradicts policy MM9. Most people live here because it is greenbelt land and we love the fact. However, more practically, it will probably mean another 240 cars on the roads around the village adding to the existing congestion in the mornings and evenings.

Attached documents:

Comment: MM2 - LPMM18/5790  Respondent: Simon Runton 17381761  Agent:

I object to GBC’s amendments to the local plan.

I have only heard of this new call for responses late in the day and seem to have been missed off the list despite being informed of previous consultations.

Again, it seems there is a reluctance to include some basic evidence; particularly the latest figures from the Office of National Statistics regarding forecasts for housing need in the area. Please make allowances for this by reopening the process to the public to make sure vital and relevant evidence is included.

Attached documents:
Comment: MM41 - LPMM18/5791  Respondent: Simon Runton 17381761  Agent:

Other notable concerns are the reliance on the Highways project to develop the M25/ A3 junction at Wisley, as the GBC local plan seems to base key evidence on a project over which it has no control. Also, the proposal that MM23 appears to water down the need for sustainable links on foot and by bike. If the council are serious about delivering a better and safer borough, then these need a great deal more work.

I also support the representation made by Wisley Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM2 - LPMM18/2735  Respondent: Brian Austin 17382305  Agent:

I have the following comments on the Main Modifications

MM2

the figures for the number of houses required, 12,600, are inconsistent with the latest figures from the Office for National Statistics for the projected growth in households in the Guildford area during the plan period of 6,635 A discrepancy of this size undermines the basis of the plan, The authoritative lower numbers would mean both many fewer houses and a much lower rate of construction. These lower figures also put in doubt the "exceptional circumstances" claimed to justify insetting of villages from the Green Belt and the removal of the strategic sites from the Green Belt.

The Public Examination of the Plan should be reopened to take into account these latest figures.

Attached documents:

Comment: MM23 - LPMM18/2736  Respondent: Brian Austin 17382305  Agent:

MM23 Place Shaping

paragraphs 6&7

The policy in paragraph 6 of this modification is welcome but it is negated by paragraph 7 for the proposed major sites. This may be ameliorated by the requirement in Para 16 that Masterplans for the major sites" shall engage with the local community" but it appears to be a loophole for unsuitable development.

paragraph 19 Villages.

The criteria listed are welcomed but there should be a fourth criterion added "d. the provisions of the relevant Neighbourhood Plan if one exists".

Attached documents:
MM40 policy A35 Former Wisley Airfield Ockham The modifications on necessary mitigation measures show just how unsuitable this site is and how much disturbance and damage it will cause to the locality. It is unsound that after the independent examiner and the Secretary of State both rejected the appeal against the refusal of planning permission for this site that it still appears in the local plan. The nature of the site has not changed, it is still not sustainable as the examiner pointed out and it will do great harm to the local neighbourhood. The modification of reducing the SNCI and then saying in paragraph 10a that every effort must be made to reduce the harm to the SNCI is unsound doublespeak.

For the above reasons I object to the Submission Local Plan and its Main Modifications

Attached documents:

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MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. Guildford Borough Council offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

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MM41 Land at Garlick's Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses originally proposed which is already excessive.
- Clearly you are ignoring previous 7000 objections to the previous lower number of planned houses.
- It is designated Green Belt containing ancient woodland.
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra vehicles will use the adjacent roads, which add to noise and pollution, given this infrastructure is not maintained will degrade the roads further
- School and medical facilities don’t have the additional capacity needed

Attached documents:

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MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. Guildford Borough Council offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/5816  Respondent: Stuart Adair 17400641   Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has subsequently been increased twice, with double the area now proposed. This is not acceptable.
- This is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, whilst Slyfield has unused capacity.
- There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- There is no proven demand it has to be here and this is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village.
- The roads are not built for large vehicles, the current A roads through send is too narrow for two lorries to pass at normal speed or mounting the curb to go onto the footpath adjacent to the road.
- Nitrogen dioxide levels are already dangerous.

Attached documents:

Comment: MM42 - LPMM18/5825  Respondent: Stuart Adair 17400641   Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. Guildford Borough Council offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/5817  Respondent: Stuart Adair 17400641   Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

New site for 120 Homes including some self-build
• This was deleted from an earlier draft because of all the objections, but re-inserted in the public examination in July, why when this objected and is objected again
• It is a Green Belt site with no special circumstances, so it also contradicts policy MM9
• It will detract from the heritage buildings at Send Marsh Green
• The additional traffic will increase pressure on the Send Crossroads which is currently in very bad condition with potholes and poor road surface.
• With Garlick's Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the
• 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM48 - LPMM18/5823  Respondent: Stuart Adair 17400641  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. Guildford Borough Council offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/5818  Respondent: Stuart Adair 17400641  Agent:

MM9 Green Belt Policy

Although the "modifications" claim to protect the Green Belt except in very special circumstances GBC make an exception for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village." This effectively negates Green Belt protection introduces and subjective view and test that is not compliant with its intentions. Hence any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents. Hence object to this use.

Attached documents:

Comment: Other comments - LPMM18/5819  Respondent: Stuart Adair 17400641  Agent:

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers' site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. This is added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/4146</th>
<th>Respondent: Jill Thomas 17408225</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>My objections are made in the knowledge of other development in Send eg 40 houses at Send Hill, 60 houses at Clockbarn and a 25% increase in Send Business Park for which we cannot now object to. It does appear to me that Send has been particularly burdened with over-development, more so than any other Village. The increase in people and traffic will give rise to congestion, pollution, inadequate schools and medical facilities, etc, and will be detriment to all who live here and for future generations.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM41 - LPMM18/4143</th>
<th>Respondent: Jill Thomas 17408225</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM41 Garlicks Arch</td>
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<td>My objection to this development is that 400 houses, latterly increased to 550 houses, is unsustainable and the infrastructure around Send will be unable to cope with the large influx of people to the area. School and medical facilities will not be adequate, roads will not be able to cope with the extra traffic which are already crowded particularly at morning and evening peak times. This is Green Belt land, it has ancient woodland on it and I understand it is contaminated with lead shot and is subject to flooding. It should not be built on.</td>
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<tbody>
<tr>
<td>MM42 Land at Burnt Common</td>
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<td>The proposals for industrial use is the largest allocation in any village in the borough. There is already a Business Centre at Tannery Lane Send. There is no demand and therefore no need to allocate land on Green Belt for industrial use at this location when more appropriate land is available at Slyfield. The local roads are inadequate for heavy traffic and industrial vehicles will add to the pollution.</td>
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</thead>
<tbody>
<tr>
<td>MM44 Land at Alderton Farm</td>
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<td>I understand this was deleted from an earlier draft due to all the objections but has now been re-inserted. The objections remain the same ie it is Green Belt and there are no special circumstances so it also contradicts policy MM9; it will detract from the 'Village Green' and ancient buildings around the Green; the identity of Send Marsh as a separate village from Send will be lost with the infilling of houses; the local roads will be unable to cope with the increase in traffic particularly at the already dangerous hairpin cross roads at the Green. This development together with others in the area</td>
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1862 of 2554
will add 770 houses to the 1700 houses currently in Send, an increase of 45%. The local infrastructure will be unable to cope with such a large increase.

Attached documents:

Comment: MM9 - LPMM18/4147  Respondent:  Jill Thomas 17408225  Agent:

MM9 Green Belt Policy

I object to the qualification 'limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the the village'. This would appear to allow development on any Green Belt land on the boundary of Send.

Attached documents:

Comment: MM2 - LPMM18/5273  Respondent:  Colin Brewer 17408481  Agent:

I object - on the following grounds:

This is green belt land and the secretary of state has already rejected this.

The housing target is wrong.

I have not been advised of the consultation.

The examination in public should be reopened so that the latest Office of National Statistics can be used

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM2 - LPMM18/4399  Respondent:  Sally Novell 17413025  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2.1 Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2.2 There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit.

5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:

2. There have been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g., through East Clandon) which will be used to avoid the inevitable traffic build-ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer-funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.

2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.

3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.

4. The development of 1800 houses at Gosden Hill.

5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North-facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways.
England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.
1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/4403  **Respondent:** Sally Novell 17413025  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

**Comment:** MM23 - LPMM18/4411  **Respondent:** Sally Novell 17413025  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

**Comment:** MM3 - LPMM18/4401  **Respondent:** Sally Novell 17413025  **Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

   MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

   MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

   **Attached documents:**

**Comment:** MM31 - LPMM18/4404  **Respondent:** Sally Novell 17413025  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

**Attached documents:**

**Comment:** MM32 - LPMM18/4405  **Respondent:** Sally Novell 17413025  **Agent:**

MM32 A height limit for White Lion Walk is required.
Comment: MM33 - LPMM18/4407  Respondent: Sally Novell 17413025  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Comment: MM35 - LPMM18/4408  Respondent: Sally Novell 17413025  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Comment: MM41 - LPMM18/4409  Respondent: Sally Novell 17413025  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Comment: MM44 - LPMM18/4410  Respondent: Sally Novell 17413025  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Comment: MM9 - LPMM18/4402  Respondent: Sally Novell 17413025  Agent:
MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

**Comment:** MM27 - LPMM18/3130 **Respondent:** Katherine Pound 17413729  **Agent:**

I OBJECT TO MM27, MM41, MM42 and MM48 Transport Strategy

As alluded to above, traffic in the area of Send is already at dangerous levels for the environment and health of individuals, most notably at peak time when it's often already at gridlock. It is ridiculous to consider adding thousands more cars to this chaos, which would result in significant noise and nitrogen dioxide pollution, which increases significantly with queuing traffic. This will significantly impact the time it takes me and other local residents to travel to work or school, which is not productive for the local economy, our well-being or the environment.

**Attached documents:**

**Comment:** MM41 - LPMM18/3126 **Respondent:** Katherine Pound 17413729  **Agent:**

My name is Katherine Pound and I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] and have lived in Send Marsh/Send all my life.

I am emailing in response to the consultation in respect of Guildford Local Plan and object to the disproportionate development now planned for the village of Send. I understand that the number of proposed houses will increase the number of houses in Send by some 45%. This is a ridiculous percentage increase, which I understand is completely out of scale to the increases being asked of other villages.

Specifically:

**I OBJECT TO MM41 Land at Garlick’s Arch, Send Marsh, Policy A43**

The proposal to now build 550 homes on this site next to the A3 is simply excessive and ignores all the thousands of previous objections made by local residents, which need to be listened to, which were to much LOWER levels of development. The increase in number of suggested homes is very unwelcome and would be very excessive over-development, destroying the villages of Send and Ripley as the two become joined. This is Green Belt land that has been specially designated to prevent building under all circumstances.

In particular I OBJECT as it is stupidity to build on a flood zone (putting existing homes as well as new homes at risk) and an atrocity to destroy historic ancient woodland that has existed since the time of Elizabeth 1 when the oak and woodland are symbols of Surrey.

I do not think the local infrastructure is well placed to accommodate such a number of new houses in terms of the resulting increase in traffic, the increased pressure put on schools and the doctors’ surgery particularly when other developments proposed for Send are taken into account, which go significantly further than the modifications in this consultation.
I am unconvinced that there is a requirement for new houses being built on this scale – with the uncertainty of Brexit in particular and the reduced numbers already being seen of people wanting to come this country, I don’t think now is the right time to commit to the ongoing building on this scale.

Attached documents:

Comment: MM41 - LPMM18/3131  Respondent: Katherine Pound 17413729  Agent:

I OBJECT TO MM27, MM41, MM42 and MM48 Transport Strategy

As alluded to above, traffic in the area of Send is already at dangerous levels for the environment and health of individuals, most notably at peak time when it's often already at gridlock. It is ridiculous to consider adding thousands more cars to this chaos, which would result in significant noise and nitrogen dioxide pollution, which increases significantly with queuing traffic. This will significantly impact the time it takes me and other local residents to travel to work or school, which is not productive for the local economy, our well-being or the environment.

Attached documents:

Comment: MM42 - LPMM18/3129  Respondent: Katherine Pound 17413729  Agent:

I OBJECT TO MM42 Land at Burnt Common, London Road, Send, Policy A58

This has already been objected to and removed from the 2014 Local Plan, and nothing has since changed to justify this building in the middle of the Green Belt, not least when there are vacant sites at Slyfield and Guildford industrial parks. There are no special circumstances so this is in contradiction to MM9.

In particular the 2017 Employment Land Need Assessment shows the demand for industrial land in the borough is only 3.9 hectares, so it is beyond ridiculous to suggest creating over 10 hectares in the middle of Send, especially in the Green Belt, which will cause gridlock in small surrounding roads. It is further incredibly deceptive to AGAIN change the wording of this policy from what was a maximum of 7,000 sq m to minimum of 7,000 sq m and then to a minimum of 14,800 sq m, more than doubling the initial proposal. There is no need for such an increase in scale here when Send Business Centre is already seeing a 25% increase. What evidence is there of demand for this?

Attached documents:

Comment: MM42 - LPMM18/3132  Respondent: Katherine Pound 17413729  Agent:

I OBJECT TO MM27, MM41, MM42 and MM48 Transport Strategy

As alluded to above, traffic in the area of Send is already at dangerous levels for the environment and health of individuals, most notably at peak time when it's often already at gridlock. It is ridiculous to consider adding thousands more cars to this chaos, which would result in significant noise and nitrogen dioxide pollution, which increases significantly with queuing traffic. This will significantly impact the time it takes me and other local residents to travel to work or school, which is not productive for the local economy, our well-being or the environment.
I OBJECT TO MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63

Most of the same considerations relating to MM41 also apply to this proposal, namely:

I do not think the local infrastructure is well placed to accommodate such a number of new houses in terms of the resulting increase in traffic, the increased pressure put on schools and the doctors’ surgery particularly when other developments proposed for Send are taken into account. The traffic through Send is already jammed at rush hour, before any of these developments are considered and the environmental aspect and pollution of significant increases in volumes of queuing traffic puts everyone's health at risk. Nitrogen dioxide levels are already high in the area.

I am unconvinced that there is a requirement for new houses being built on this scale – with the uncertainty of Brexit in particular and the reduced numbers already being seen of people wanting to come this country, I don’t think now is the right time to commit to the ongoing building on this scale.

There is no case for plundering the Green Belt, which people of a previous generation, with seemingly more foresight than we have today, created specifically to prevent such ever expanding urban sprawl.

The proposed development will also damage the special character of the Green at Send Marsh, which is a key part of village life, eg the annual Send Marsh Bonfire. Additionally this proposal has already been objected to and removed from an earlier draft local plan so it is underhand to re-add it into this consultation.

I OBJECT because there are no special circumstances to build on this Green Belt site which contradicts MM9.

I OBJECT TO MM27, MM41, MM42 and MM48 Transport Strategy

As alluded to above, traffic in the area of Send is already at dangerous levels for the environment and health of individuals, most notably at peak time when it's often already at gridlock. It is ridiculous to consider adding thousands more cars to this chaos, which would result in significant noise and nitrogen dioxide pollution, which increases significantly with queuing traffic. This will significantly impact the time it takes me and other local residents to travel to work or school, which is not productive for the local economy, our well-being or the environment.

I OBJECT TO MM9 Green Belt Policy
ANY attempt to attack the Green Belt should be rejected as it undermines the whole reason the Green Belt came into existence. You don't take down a sea wall just because it comes under more pressure as sea levels rise, if anything you reinforce it more, and similarly our Green Belt should be increasingly protected as it comes under more pressure.

“Limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village” is just an excuse to get around Green Belt policy and is a dangerous start of a slippery slope. It by no means excuses building on Green Belt at the cost of future generations.

Attached documents:

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**Comment:** MM51 - LPMM18/4930  **Respondent:** Rhys Beynon 17413953  **Agent:**

Again I must strongly object to the revised Local Plan for West Horsley. The withdrawing of the grant of Green Belt to our village must be resisted in every possible way. As any reasonable local resident I do appreciate that a reasonable number of houses are required in our area but the local plan as amended greatly exceeds the limited infrastructure which exists or which could be developed quickly enough to cope with the order of proposed house building. What our village needs for our young people is council built properties that can be rented by the many low paid workers rather than high priced executive properties which will be filled by highly paid commuters leaving our villages as empty dormitories having to import services from outside our area.

Please reconsider the Local Plan before it leads to the death of our historic village.

Attached documents:

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**Comment:** MM45 - LPMM18/4370  **Respondent:** Bernard & Ruth Phillips 17414177  **Agent:**

We are writing to advise you of our concerns and formal objection to the modifications to the Guildford Borough Local Plan, specifically relating to Policy A64, Land between Glaziers Lane and Strawberry Farm, Flexford (MM45).

It is irresponsible to propose to expand the village without first having plans in place to improve the infrastructure. Living at a property on Glaziers Lane directly opposite to the proposed site, very close to the railway bridge, we feel first-hand the effect of heavy goods vehicles making their way over the narrow, angled bridge. Walking over the bridge is life-threatening as vehicles passing over the bridge come within centimetres of the edge of the pavement. For the construction of 105 homes, which would take a number of years, the onslaught of heavy goods vehicles over this bridge to access the site would be horrendous. The infrastructure to accommodate the building site and the additional traffic throughout the village once the site has been developed has to be planned first and the Local Plan provides no detail in that regard.

Development of this site would eradicate the openness and separation between Flexford and Normandy to create a sprawling conurbation that is completely out of character with the concept of the Green Belt. Would this development mean that the Green Belt would be eradicated on the east side of Glaziers Lane, whilst remaining intact on the west? If so, then the proposal is non-sensical. Furthermore, as there are no special circumstances prevailing that would permit the abandonment of the Green Belt for such a development, this plan must be rejected.

Attached documents:

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**Comment:** MM24 - LPMM18/594  **Respondent:** Thames Water (Thames Water) 17415521  **Agent:**

We are writing to advise you of our concerns and formal objection to the modifications to the Guildford Borough Local Plan, specifically relating to Policy A64, Land between Glaziers Lane and Strawberry Farm, Flexford (MM45).

It is irresponsible to propose to expand the village without first having plans in place to improve the infrastructure. Living at a property on Glaziers Lane directly opposite to the proposed site, very close to the railway bridge, we feel first-hand the effect of heavy goods vehicles making their way over the narrow, angled bridge. Walking over the bridge is life-threatening as vehicles passing over the bridge come within centimetres of the edge of the pavement. For the construction of 105 homes, which would take a number of years, the onslaught of heavy goods vehicles over this bridge to access the site would be horrendous. The infrastructure to accommodate the building site and the additional traffic throughout the village once the site has been developed has to be planned first and the Local Plan provides no detail in that regard.

Development of this site would eradicate the openness and separation between Flexford and Normandy to create a sprawling conurbation that is completely out of character with the concept of the Green Belt. Would this development mean that the Green Belt would be eradicated on the east side of Glaziers Lane, whilst remaining intact on the west? If so, then the proposal is non-sensical. Furthermore, as there are no special circumstances prevailing that would permit the abandonment of the Green Belt for such a development, this plan must be rejected.

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

As you will be aware, Thames Water are the statutory sewerage undertaker for the whole of the Guildford Borough and the statutory water undertaker for the southern part of the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the proposed amendments:

**MOD Ref MM24 Definitions para 4.5.20**

We support the amended wording in relation to setting most challenging water efficiency targets.

**Attached documents:**

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**Comment:** MM26 - LPMM18/595  **Respondent:** Thames Water (Thames Water) 17415521  **Agent:** Savills (Tasha Hurley)

**MOD Ref MM26 Policy ID1: Infrastructure**

We support the amended wording in principle, but are disappointed that the changes do not go far enough in relation to Thames Water’s response to the submission draft.

As previously indicated we consider that the additional text should be added to support Policy ID1:

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/ seweage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in year 1 of the AMP6 period which runs from 1st April 2015 to 31st March 2020 and does not therefore cover the whole Local Plan period. AMP7 will cover the period from 1st April 2020 to 31st March 2025. The next Price Review, whereby the water companies’ AMP7 Business Plan will be agreed with Ofwat, will take place in 2019.

We therefore recommend the Local Plan include the following policy/supporting text:

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

**MOD Ref MM26 Policy ID1: Infrastructure**

We support the amended wording at 13a in relation to ensuring that sufficient capacity is available within Ripley wastewater treatment works.

**Attached documents:**
**Comment: MM27 - LPMM18/5083  Respondent: Paul Good 17417217  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock, as already stated in previous points. This area is unable to support increased residential traffic and is unsuitable for heavy commercial traffic.

In conclusion, development of this scale in this rural village will be detrimental to the character of this living space, and impact hugely on residents, there is insufficient consideration of the enormous size of development being placed in one small area of the constituency, as opposed to spacing out development, which would ease traffic overloading, decrease the escalating problem of pollution, share the increased strain on services; education, health.

I urge the planners to take these objections in to consideration and listen to the observations regarding these plans from the people who live and work in these areas and see each day how the infrastructure is completely inappropriate to support such huge development in squeezed into one small area of the borough.

**Attached documents:**

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**Comment: MM41 - LPMM18/5077  Respondent: Paul Good 17417217  Agent:**

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

This area has now allotted an increased number of new homes from 400 to 550 homes of which 450 to be built in the first five years

The reasons being- An increase of 37% in the number of houses proposed which is excessive.

In the previous consultation approx 7000 objections to the previous lower number have been ignored. This is Green Belt containing ancient woodland. Building this large number of homes here will join up Send and Ripley and constitute over development, losing the important village description of these two ancient villages.

in addition the site is known to be subject to frequent flooding and contaminated by lead shot.

At least 800 extra cars will block up the adjacent roads which are regularly gridlocked from over density of traffic already using these routes. School and medical facilities will be strained to breaking point, especially as Ripley Primary has been closed and secondary schools are bursting at the seams, with Christ College and Kings College being ranked as the lowest in Surrey, and therefore in a poor place to accommodate additional pupils.

**Attached documents:**

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**Comment: MM41 - LPMM18/5084  Respondent: Paul Good 17417217  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer no
proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock, as already stated in previous points. This area is unable to support increased residential traffic and is unsuitable for heavy commercial traffic.

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I urge the planners to take these objections into consideration and listen to the observations regarding these plans from the people who live and work in these areas and see each day how the infrastructure is completely inappropriate to support such huge development in squeezed into one small area of the borough.

Attached documents:

Comment: MM42 - LPMM18/5080  Respondent: Paul Good 17417217  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

Since being deleted from the 2014 plan this has been increased twice, doubling the area despite objections to its inclusion originally.

It is by far the largest new industrial allocation in any village in the borough.

There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity.

There are no special circumstances so it also contradicts MM9. The Employment Land Needs Assessment showed a reduction in demand for industrial land.

This is in addition to the 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.

The road though Send to Woking is narrow, residential with tight bends towards Old Woking. This road has seen several serious accidents, and is gridlocked regularly from Broadmeads through Send towards Burnt Common several times a month with current usage.

Nitrogen dioxide levels are already dangerous in what is a highly residential area, recent press coverage implied that maintaining air quality for its constituents was very important to Surrey County Council and local councils. Guildford Borough Council Air Quality Strategy – 2017 v10 /Surrey County Council Air Quality Strategy (2016)

Attached documents:

Comment: MM42 - LPMM18/5085  Respondent: Paul Good 17417217  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock, as already stated in previous points. This area is unable to support increased residential traffic and is unsuitable for heavy commercial traffic.

In conclusion, development of this scale in this rural village will be detrimental to the character of this living space, and impact hugely on residents, there is insufficient consideration of the enormous size of development being placed in one small area of the constituency, as opposed to spacing out development, which would ease traffic overloading, decrease the escalating problem of pollution, share the increased strain on services; education, health.

I urge the planners to take these objections in to consideration and listen to the observations regarding these plans from the people who live and work in these areas and see each day how the infrastructure is completely inappropriate to support such huge development in squeezed into one small area of the borough.

Attached documents:

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**Comment:** MM44 - LPMM18/5081 **Respondent:** Paul Good 17417217  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

New site for 120 Homes including some self build

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July

It is a Green Belt site with no special circumstances so it also contradicts policy MM9

It will detract from the heritage buildings at Send Marsh Green

The additional traffic will increase pressure on the Send Crossroads.

**With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure. It will change the character of the villages of Send, Send Marsh and Ripley irrevocably.**

Attached documents:

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**Comment:** MM48 - LPMM18/5086 **Respondent:** Paul Good 17417217  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock, as already stated in previous points. This area is unable to support increased residential traffic and is unsuitable for heavy commercial traffic.
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I urge the planners to take these objections in to consideration and listen to the observations regarding these plans from the people who live and work in these areas and see each day how the infrastructure is completely inappropriate to support such huge development in squeezed into one small area of the borough.

Attached documents:

Comment: MM9 - LPMM18/5082  Respondent: Paul Good 17417217   Agent:

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents. This is not rigorous enough to protect the very precious Green Belt encircling the village boundary.

Attached documents:

Comment: MM2 - LPMM18/1460  Respondent: Claire Attard 17417633   Agent:

With regard to the rest of the modifications there are several points which are not acceptable. In view of the latest ONS statistics, which were released a few weeks ago, the GBC has not taken these figures into account and therefore your housing target is wrong, which means the plan is unsound. Also in MM2 - there should be no need for Guildford to take Woking’s unmet need, which would require further green belt release.

Attached documents:

Comment: MM41 - LPMM18/1471  Respondent: Claire Attard 17417633   Agent:

With regard to the rest of the modifications there are several points which are not acceptable.

MM41 - the transport strategy modelling, which is used by your plan, is inadequate. Specifically the fact that the delay in J10 of the M25 by Highways England RIS of at least two years will impact all development that relies on this scheme.

Attached documents:
Regarding the modifications of GBC Local Plan, I would like to object wholeheartedly to these modifications. Over the last few years I have repeatedly objected to the Local Plan in our area. Time and time again I have listed my objections and am horrified that you have added to the land south of the appeal site, which will completely overlook our house and land and completely ruin our historic hamlet, turning it into a large town of ridiculous proportions. Also, a lot of this land is constrained by the VOR (air traffic control beacon) which prevents any construction within a certain radius. Regarding MM47, the size of the SNCI is drastically reduced, which is not acceptable and there is no justification for it. It will destroy the biodiversity of this area. I also understand that an Appropriate Assessment and a Habitats Regulation Assessment have not been completed which is a breach of case law.

Attached documents:

With regard to the rest of the modifications there are several points which are not acceptable. MM9 - the infilling in and around villages will result in the weakening of protection of the countryside.

Attached documents:

Dear Sir / Madam

We have recently been informed by our local action group that we need to make any objections/comments regarding the modifications of the GBC Local Plan.

Firstly, it appears that you are no longer sending us emails, along with thousands of other local residents, due to the GDPR issue. I received around 100 emails, regarding GDPR, from other companies/organisations, and, if I no longer wished to receive their emails, I notified them to that effect. I am assuming that your GDPR email has requested everyone to opt in to continue receiving the emails, which means that the majority of people did not read your email carefully enough and, like me, did not request to continue receiving them. Please can you make sure you add my name to continue receiving your emails from immediate effect.

Finally, I note that Strategic sites are to be exempt from design constraints! This will result in inappropriate developments such as that proposed on Three Farm Meadows. There is also no evidence that recent case law, such as “People over Wind” has been taken into account.

For all the above reasons I am calling for the hearing to be reopened, specifically so that the latest Office of National Statistics can be used. I would also like to advise that I support the representation made by WAG (Wisley Action Group), which was written with advice from Richard Harwood QC.

Attached documents:
### Comment: MM41 - LPMM18/4246  Respondent: Valerie Golding 17422881  Agent:

**MM41 LAND AT GARLICK’S ARCH POLICY A43**

I OBJECT TO THE POLICY MM41 Land at Garlick’s Arch:

This land is GREEN BELT and it contains two areas of ancient woodland. To consider any form of development is wrong, but to propose to build 550 property should be resisted at all cost it is a 37% increase in the original proposal. Part of the area of the land is subject to flooding, the proposed development will also increase the vehicles on Send’s Roads by a minimum of a 1000. The Ancient woodland has protection under the NPPF section 118, unless the development is of national importance which this certainly is not. Even if the development does not require the removal of the wood. A development of that size will have a major impact. A recent report on the state of wildlife in the UK shows worrying trends, where as a local survey in Surrey shows that it is faring particularly badly. With the closure of Ripley school any large development would put Sends’ schools at breaking point and put excessive pressure on the medical centre. It would certainly go against the government’s claim that the GREEN BELT is safe in their hands.

### Comment: MM42 - LPMM18/4247  Respondent: Valerie Golding 17422881  Agent:

**MM42 LAND AT BURNT COMMON LONDON ROAD POLICY A58**

I OBJECT TO THE POLICY MM42 Land at Burnt Common because: this site is located within the green belt yet the council are proposing to double their last proposal, the site was deleted from the 2014 Local Plan due to objections yet put back into the 2016 Plan this current proposal looks too increase the development to 14800 square metres of warehouse or industrial units over 50% more than that proposed in the 2016 Local Plan. There is currently no requirement for more industrial units. Guildford and Slyfield currently have empty sites and there is a decline in the demand for such sites, the 2017 employment land need assessment shows a reduction in demand to 3.9 hectares for the whole borough, yet the council are proposing to destroy 10 hectares of Sends GREEN BELT for unnecessary units putting even more pressure on the local roads and adding to the development along the A3 corridor totally against the GREEN BELT policy.

### Comment: MM42 - LPMM18/4247  Respondent: Valerie Golding 17422881  Agent:

**MM27 MM41 MM42 and MM48 Transport Strategy**

The amount of development proposed will bring major traffic problems to the area most properties have a minimum of two cars so the developments proposed would add another 1540 cars to the roads of Send. This excludes the development proposed for the surrounding area.

### Attached documents:
The amount of development proposed will bring major traffic problems to the area most properties have a minimum of two cars so the developments proposed would add another 1540 cars to the roads of Send. This excludes the development proposed for the surrounding area.

**Comment:** MM44 - LPMM18/4248  **Respondent:** Valerie Golding 17422881  **Agent:**

**MM44 LAND AT ALDERTON’S FARM, Send Marsh Rd POLICY A63**

I OBJECT TO THE POLICY MM44 Land at Alderton’s Farm, Send Marsh Rd because: This proposed development would reduce the open space between Send Marsh and Send, it is outside the boundary of Send Marsh so it would be an invitation for developers to use it as a precedent for any land they wish to build on. The development would overpower the heritage buildings that are located around the green and would increase the pressure on Send cross road which are creaking at the moment.

**Attached documents:**

**Comment:** MM48 - LPMM18/4252  **Respondent:** Valerie Golding 17422881  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The amount of development proposed will bring major traffic problems to the area most properties have a minimum of two cars so the developments proposed would add another 1540 cars to the roads of Send. This excludes the development proposed for the surrounding area.

**Attached documents:**

**Comment:** MM9 - LPMM18/4249  **Respondent:** Valerie Golding 17422881  **Agent:**

**MM9 GREEN BELT POLICY**

I object to the proposal to allow,” limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This is nothing more than a green light for developers to destroy the green belt. And totally against the green belt principals of stopping villages merging into one.

**Attached documents:**

**Comment:** MM2 - LPMM18/1760  **Respondent:** Gareth Porter 17423361  **Agent:**

I feel very strongly that the examination in public should be reopened so that latest info and statistics can be used.
I only heard about this via someone else. I have not had any formal notification. Not sure this is a true public consultation if people don’t get notified.

I fully support WAG and their representations

Attached documents:

**Comment: MM2 - LPMM18/2536 Respondent: Simon Wright 17423681 Agent:**

I wish to make comment on Policy S2

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year.

After this Barton Willmore, Consultancy, has found that the correct figure should be 431. Following on from this, September data from the Office for National Statistics, which carries out population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year.

It seems that the Local Plan is inaccurate.

**Conclusion:**

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites. GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

Please explain why thousands of previous objections are ‘not relevant’ this time round? How difficult can it be for GBC to listen to the people who know the area best - the residents? The whole process of this Local Plan has been a farce. I suggest GBC take note of local residents concerns and objections before the implications are borne out at the next council election.

I am not completely against development, but I oppose development without thought and consideration for the basics, and which will be detrimental for the area.

Attached documents:

**Comment: MM27 - LPMM18/2532 Respondent: Simon Wright 17423681 Agent:**

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:
I object to the following specific modifications to the Local Plan:

Policy A43, Land at Garlicks Arch, Send Marsh (Modification MM41)

I object to modifications MM41 Land at Garlicks Arch due to the following points.

An increase of 37% in housing numbers is excessive and will result in urban sprawl and the neighbouring villages merging into one another. It constitutes over development. These further additions to the housing numbers are not required.

It is an unsustainable location. It will undoubtedly cause traffic chaos on the minor surrounding roads. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, anyone who lives in these areas will confirm that this is the case. Substantially more vehicle movements will result in even more congestion and greater pollution. Residents and the environment will suffer as a result.

This green belt land contains ancient woodland dating back to the 16th century, which should be preserved. There is no good reason to tamper with it with additional housing numbers.

An extra 150 houses means easily an extra 300 cars on the local roads, which cannot be accommodated.

This site is identified as being in a Flood Zone 2 and regularly floods during winter months.

This site contains land which is heavily contaminated by many years of shooting with lead shot.

The local school and medical facilities won’t be able to accommodate extra housing. It is already at maximum capacity (not helped by the feeble decision to close Ripley school).

Above all, the latest changes to this site have completely ignored the thousands of previous comments from residents (who know the area best of all) during the previous consultations.

Attached documents:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

Policy A58 Land at BurntCommon (Modification MM42)
I object to modifications MM42 Land at Burnt Common due to the following points:

There is no requirement for new (and certainly not increased) industrial or warehouse space as there is ample availability at Slyfield and Guildford Industrial estates, developing in this way is pure stupidity and is just building for the sake of it.

Additionally, this site is in the Green Belt, there are no exceptional circumstances to justify development here.

This proposal completely contradicts the statement MM9 makes.

According to the latest Employment Land Needs Assessment there is a reduction in demand for industrial land in the whole borough. Everywhere you look around the borough there are empty industrial buildings! Again…pure stupidity.

Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

Any extra traffic would cause traffic chaos in the local area with its small roads, adding commercial vehicles to this would be completely unsustainable.

After this site was deleted from the 2014 Local Plan due to massive objections, it has now been re introduced and doubled in size, farcical, especially on top of a 25% increase in size of Send Business Centre. This results in an excessive concentration in this village than any other in the borough. And there’s no requirement for it!

Attached documents:

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Comment: MM42 - LPMM18/2534  Respondent: Simon Wright 17423681  Agent:

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

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Comment: MM44 - LPMM18/2530  Respondent: Simon Wright 17423681  Agent:

Policy A63 Land at Aldertons Farm, Send Marsh Road (Modification MM44)

I object to modifications MM44 Land at Aldertons due to the following points:

This site is in the Green Belt, there are no exceptional circumstances to justify development here so it contradicts Policy MM9.

This site is located close to listed historic buildings at Send Marsh Green and any development here would be too modern, and without a doubt designed so badly that it would ruin the rural character of the whole area. I cannot think of a modern development that doesn’t stand out like a sore thumb and looks totally out of place.
The inevitable extra traffic would cause increased congestion at Send Mays Corner crossroads. Combined with the extra traffic on the Send Road due to the other increases at Garlicks Arch and Burntcommon, and the whole area would become unsustainable.

With the proposed extra numbers of houses at Garlicks Arch & Clockbarn sites it would overcome the current infrastructure.

This site was sensibly removed from an earlier version of the Local Plan, and was re introduced in July. Why?

Attached documents:

**Comment:** MM48 - LPMM18/2535  **Respondent:** Simon Wright 17423681  **Agent:**

I object to Modifications MM27, MM41, MM42 & MM48 Transport Strategy due to the following points:

The result of proposed Local Plan development in the area of Send would cause so much traffic congestion, that the plans to improve the A3 and Clandon slip roads would not make any significant difference at all. The rural roads in the centre of Send / Send Marsh couldn’t cope with the extra traffic. Regardless of traffic surveys that have been carried out in recent months and years, it doesn’t take much to realise it.

Attached documents:

**Comment:** MM9 - LPMM18/2531  **Respondent:** Simon Wright 17423681  **Agent:**

I object to Modification MM9 Green Belt Policy due to the following points:

The modifications in this policy are supposed to protect the Green Belt. However in reality, they allow ‘limited infilling outside the identified settlement boundary’ in certain circumstances. In other words, a loophole which allows indiscriminate development.

Attached documents:

**Comment:** MM2 - LPMM18/1680  **Respondent:** Hugh Grear 17424065  **Agent:**

Please reopen the Local Plan so that the latest ONS statistics can be used.

Please note that I have not been advised about the Consultations (and don’t try to hide behind GDPR)

I support the subissions from WAG

Once again GBC is trying to circumvent the decision of the Secretary of State and prefers big business to the will of the people.

Attached documents:
Modifications to GBC Local plan – Objection

I am writing to object to the modifications to the GBC Local Plan. The consultation period was not widely broadcast (as indicated by the very low number of responses received) and I therefore find myself at a disadvantage in terms of the time available to make my views known.

What I will identify at this stage is that it is clear that the underlying statistics upon which the Council has based its decision to modify the Local Plan and add land to the south of the Wisley Appeal site are simply incorrect. That alone, in my view, is a sufficient ground upon which the Council should be required to reopen the hearing.

Attached documents:

I disagree with your proposals to inset several towns and villages from the Green Belt, making development that much easier in such places. I find it entirely unjustified and shocking - what kind of legacy does it set up for the next generations?

Looking at other sites e.g. urban, brownfield and windfalls, green field development in the protected Green Belt is entirely unnecessary, especially since urban brownfield is given priority under the new S3 Policy. Furthermore I understand that the latest ONS figures show a much smaller housing requirement (which can be met by higher priority sites). No “exceptional circumstances”, as required by the NPPF, have been offered for any Green Belt development or for “insetting” most of the borough’s villages such as the Horsleys.

Attached documents:

The changes to Policy D1 dilute some vital social requirements and deletion of Policy D4 is not justified as it met the soundness test. Less specific text gives a freer hand to developers to get away with socially unsustainable building - a comment which can be read for many of your proposed changes.

I understand that many people who took place in feeding back to the first consultation have not been reminded that this new consultation is taking place, which surely brings its legitimacy into doubt.

Attached documents:

Policy S3 should be strengthened to focus on the prioritising the Guildford urban area inspiring urban regeneration over building on our precious Green Belt.
My previous objection related in particular to the loss of Green Belt land. I now notice that you have ignored this and increased the number of intended houses.

- I object most strongly to the removal of green belt in this area.
- Despite assurances there is no doubt that this build will hugely increase the number of cars trying to enter the area on to the Portsmouth Road and the Clandon Road. This will cause heavy congestion - too much for the villages.
- Our schools and doctor's surgeries are already full - 3 weeks to gain an appointment locally!! This extra burden without sufficient infrastructure additions is too much for the locality to bear.
- The proposed site is used currently for shooting and is therefore contaminated by the lead shot which results from this sport.
- I do not believe that an increase of 37% over the original and objected to element can be justified.
- The additional traffic resulting from this development will seriously impact the village especially at Send Crossroads. This additional development is too much for our village and will seriously harm our infrastructure.

The proposed A3 changes and Clandon Road changes do not provide adequate support for the changes that would be incurred through this development suggestion. No assessment has been advised to us as loyal council tax payers regarding it. Roads towards London and Woking are very heavy every day already. This situation can only add journey time, increased pollution and gridlock within the villages environments.
it. Roads towards London and Woking are very heavy every day already as I know from commuting. This situation can only add journey time, increased pollution and gridlock within the villages environments.

In sending these objections I would further add that this consultation has not permitted mention of the further developments proposed in our village. There is a strong feeling of being singled out and yet for what reason?? This village is important as a residential area, a commuting area to London producing wealth for GBC, an employment area within GBC whilst maintaining it's community and provision of local amenities. It is based on a historical foundation, parts of it dating back to Doomsday and beyond. The proposed developments are out of synch with the needs of the council which can be realised through more equitable sharing throughout its geography.

Attached documents:

Comment: MM9 - LPMM18/4089 Respondent: Reverend Ruth Broithwell 17424705 Agent:

MM9

I object most strongly to the removal of green belt in this locality. Using 'limited infilling outside the identified settlement boundaries' as an excuse for this development shows very poor concern for loyal residents, is entirely subjective and produces uncertainty. Investment in property in this area was made believing certain areas were inviolate and this may well cause a change in the nature of the wealth of the entire area which would be a loss to GBC.

Attached documents:

Comment: MM27 - LPMM18/2621 Respondent: Gregory Webb 17424801 Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The proposed Garlicks Arch, Alderton’s Farm, Clock Barn and Winds Ridge developments mean that 770 houses are proposed to be added to the current stock of 1700 currently in Send – an increase of 45%. This in itself is excessive and disproportionate in the context of Send’s size within the Borough. Send needs to be treated fairly and it currently seems as though the village is being singled out for development by the plan.

However, the huge increase in traffic that these developments, the industrial developments that are proposed in Send and the large developments at Gosden Hill and potentially Wisley/Ockham are not adequately addressed by the modifications referenced above.

A full assessment of the changes resulting from the proposed access on and off the A3 from Clandon Road has not been completed. At present residents of Clandon Road may wait more than 5 minutes to leave their drives during commuting periods. Would I ever be able to leave for work if these developments proceeded? The scale of development proposed in Send and Burnt Common, the limited capacity of local roads and the proposed introduction of new access to the A3 will be catastrophic for the local area and the Borough as a whole.

I most strongly urge the Council to rethink the Local Plan, stand up to central government if the planning policies for England are not appropriate for Guildford, and to provide a just and reasonable outcome for its citizens.

Attached documents:
Comment: MM41 - LPMM18/2617  Respondent: Gregory Webb 17424801  Agent:

I must object in the strongest possible terms to the latest version of Guildford Borough Council’s Local Plan

MM41 Land at Garlicks Arch

The increase in size of this development by 37%, which was too large in the last draft of the Local Plan, is just simply too much to absorb for the village of Send and in particular the residents of Burnt Common.

- Local infrastructure will not be able to cope with the c.800 extra cars present in the area following the construction of 550 extra homes
- Our schools and medical facilities will be broken by this development
- The character of the area will be completely changed by developing on this Green Belt land, for which no local resident has advocated
- This development will link up the villages of Send and Ripley removing their special identities, which can only represent over development in this part of the Borough

In addition, I understand the area is prone to flooding, contaminated by lead shot and part of the area constitutes ancient woodland. There cannot be many more inappropriate sites for a development. I believe the Council, in proposing this development, is failing its citizens in an egregious way that would leave a lasting legacy of failure.

Attached documents:

Comment: MM41 - LPMM18/2622  Respondent: Gregory Webb 17424801  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

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However, the huge increase in traffic that these developments, the industrial developments that are proposed in Send and the large developments at Gosden Hill and potentially Wisley/Ockham are not adequately addressed by the modifications referenced above.

A full assessment of the changes resulting from the proposed access on and off the A3 from Clandon Road has not been completed. At present residents of Clandon Road may wait more than 5 minutes to leave their drives during commuting periods. Would I ever be able to leave for work if these developments proceeded? The scale of development proposed in Send and Burnt Common, the limited capacity of local roads and the proposed introduction of new access to the A3 will be catastrophic for the local area and the Borough as a whole.

I most strongly urge the Council to rethink the Local Plan, stand up to central government if the planning policies for England are not appropriate for Guildford, and to provide a just and reasonable outcome for its citizens.

Attached documents:

Comment: MM42 - LPMM18/2618  Respondent: Gregory Webb 17424801  Agent:
**Comment: MM42 - LPMM18/2623  **
**Respondent:** Gregory Webb 17424801  
**Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The proposed increase from 7000 to a minimum of 14,800 sq m of industrial and storage space is completely illogical because:

- There is no need to put new industrial sites in the Green Belt when there is unused capacity at Slyfield
- The Employment Land Needs Assessment showed a reduction in the demand for industrial land
- There are no special circumstances, so there is a contradiction with MM9

Additionally this development would place yet another significant load on the infrastructure within Send on top of the proposed 25% increase at Send Business Centre and every other residential development proposed. Send roads will be gridlocked, pollution levels will increase and become higher than the dangerous levels already recorded.

**Attached documents:**

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**Comment: MM44 - LPMM18/2619  **
**Respondent:** Gregory Webb 17424801  
**Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

The proposed Garlicks Arch, Alderton’s Farm, Clock Barn and Winds Ridge developments mean that 770 houses are proposed to be added to the current stock of 1700 currently in Send – an increase of 45%. This in itself is excessive and disproportionate in the context of Send’s size within the Borough. Send needs to be treated fairly and it currently seems as though the village is being singled out for development by the plan.

However, the huge increase in traffic that these developments, the industrial developments that are proposed in Send and the large developments at Gosden Hill and potentially Wisley/Ockham are not adequately addressed by the modifications referenced above.

A full assessment of the changes resulting from the proposed access on and off the A3 from Clandon Road has not been completed. At present residents of Clandon Road may wait more than 5 minutes to leave their drives during commuting periods. Would I ever be able to leave for work if these developments proceeded? The scale of development proposed in Send and Burnt Common, the limited capacity of local roads and the proposed introduction of new access to the A3 will be catastrophic for the local area and the Borough as a whole.

I most strongly urge the Council to rethink the Local Plan, stand up to central government if the planning policies for England are not appropriate for Guildford, and to provide a just and reasonable outcome for its citizens.

**Attached documents:**

---

**Comment: MM44 - LPMM18/2619  **
**Respondent:** Gregory Webb 17424801  
**Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

It beggars belief that this site has been reintroduced into the Local Plan following its earlier deletion based upon the large number of objections. This development:

- Contradicts policy MM9, because there are no special circumstances to warrant a development like this in the Green Belt
- Will detract from the Heritage buildings in the area
• Create yet more traffic in Send and in particular create huge congestion at the Send cross road, which in turn will increase pollution for all. This in turn will deter pedestrians and cyclists from moving around the village, undermining village life. Not all residents are commuters.

Attached documents:

Comment: MM48 - LPMM18/2624  Respondent: Gregory Webb 17424801  Agent: MM27, MM41, MM42 and MM48 Transport Strategy

The proposed Garlicks Arch, Alderton’s Farm, Clock Barn and Winds Ridge developments mean that 770 houses are proposed to be added to the current stock of 1700 currently in Send – an increase of 45%. This in itself is excessive and disproportionate in the context of Send’s size within the Borough. Send needs to be treated fairly and it currently seems as though the village is being singled out for development by the plan.

However, the huge increase in traffic that these developments, the industrial developments that are proposed in Send and the large developments at Gosden Hill and potentially Wisley/Ockham are not adequately addressed by the modifications referenced above.

A full assessment of the changes resulting from the proposed access on and off the A3 from Clandon Road has not been completed. At present residents of Clandon Road may wait more than 5 minutes to leave their drives during commuting periods. Would I ever be able to leave for work if these developments proceeded? The scale of development proposed in Send and Burnt Common, the limited capacity of local roads and the proposed introduction of new access to the A3 will be catastrophic for the local area and the Borough as a whole.

I most strongly urge the Council to rethink the Local Plan, stand up to central government if the planning policies for England are not appropriate for Guildford, and to provide a just and reasonable outcome for its citizens.

Attached documents:

Comment: MM9 - LPMM18/2620  Respondent: Gregory Webb 17424801  Agent: MM9 Green Belt Policy

Unfortunately the modifications made to this policy introduce a subjective test. The phrase “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village” begs the question - how will it be demonstrated and who will consider that the development is within the village?

It is unacceptable that residents should need to fight against developers continuously to maintain the character of the villages within which they live.

Attached documents:

Comment: MM2 - LPMM18/5277  Respondent: Holly Brewer 17425473  Agent:
I object - on the following grounds:

The sever impact on Strategic Highways network.

I have not been advised of the consultation

The examination in public should be reopened so that the latest Office of National Statistics can be used

I support the representation made by Wisley Airfield Action Group which was written with advice from Richard Harwood QC

Attached documents:

Comment: MM27 - LPMM18/4712  Respondent: Darren Moss 17426593  Agent:

MM27, MM41, MM42 and MM48-Transport Strategy.
This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why?
The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane. I have witnessed this personally and it continues to get worse and this over development of Send will only exacerbate this.

This massive increase in traffic rat running to and from Woking along Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM41 - LPMM18/4707  Respondent: Darren Moss 17426593  Agent:

MM41-Land at Garlicks Arch, Send Marsh – Policy A43

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.
This is a significant increase of 37% in the number of houses to be built when the original proposed number of houses received 7000 OBJECTIONS. This suggests a flawed consultation process! We are not being listened to at all!

Equally during this ongoing process there is already an ‘under the radar’ increase in housing numbers in Send. These are ongoing small ‘in-fill’ housing developments, two or three houses popping up in Send and it’s close proximity – these houses are not being taken of the target figures! We are also aware of other significant (40 and 60 houses) developments in progress in the area too! There are already too many houses in this area.
The ancient woodland that has stood for hundreds of years will be ruined once and for all.
This over development will join Ripley to Send, and spoil the intention and foresight of our Green Belt Planners of many years ago.
This site is contaminated by many years of Clay Pigeon Shooting and is prone to frequent flooding.
Up to a 1000 cars and between 1600 to 1700 extra people will completely block the surrounding roads. It is almost
impossible to move out of my drive onto the road if there are problems on the A3. Send regularly comes to a standstill if the A3 or M25 has a problem.

The area’s services (schools, roads, health facilities, sewage, water etc) are already at full capacity. At the public examination the figure for Guildford.B.C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated. The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year. Why is the requirement to build a vast majority of these houses in Send? We have a poor road system and NO train service!

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspect. The Inspector and GBC must seriously reduce the housing need to reflect the true figures, and notably in our already very congested village of Send.

MM27. MM41. MM42.and MM48-Transport Strategy. This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clndon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane.

This massive increase in traffic of all sorts heading to and from Woking along. Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM42 - LPMM18/4702  Respondent: Darren Moss 17426593  Agent: MM42-Land at Burnt Common, London Road, Send, Policy A58

The Employment Lands Needs Assessment showed a reduction in demand for Industrial Land.

This plan was deleted in 2014 plans, however this has subsequently been increased TWICE from 7000 to a MINIMUM of 14,800sqm! Therefore why is Send been given this HUGE increase when there is NO NEED and it will make Send the village with the largest industrial allocation of any village in the borough! WHY when Slyfield which is sufficiently close by and is this not being increased – it has unused capacity!

There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.

There is no need to put Industrial premises in our precious GREEN BELT.

Surrounding roads will be further gridlocked causing an increase in already high Nitrogen Dioxide levels!

MM27. MM41. MM42.and MM48-Transport Strategy.

This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and
Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane. I have witnessed this personally and it continues to get worse and this over development of Send will only exacerbate this.

This massive increase in traffic rat running to and from Woking along Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM44 - LPMM18/4709  Respondent: Darren Moss 17426593  Agent:

MM44-Land at Aldertons Farm, Send Road, Policy A63.
New site for 120 homes which was deleted because of objections, this was reinserted for public examination in JULY. With Garlicks Arch 550, Clockbarn 60, Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%!
Our roads, sewage, water, healthcare, schools will prevent us from being able to live normal lives in this polluted gridlocked stressful environment.
Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

Attached documents:

Comment: MM48 - LPMM18/4718  Respondent: Darren Moss 17426593  Agent:

MM27, MM41. MM42,and MM48-Transport Strategy.
This area is already very heavily congested! There has been no investigation into the effect caused by 1000’s more cars on these local roads. Why?
The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley, Ockham will bring the area more regularly to a standstill and has not been adequately addressed by the Road changes to the A3 and Clandon Slip Roads. It will become impossible for residents of Potter’s Lane to actually leave their driveways or pull out into the flow of traffic. There are many high-sided, wide and heavy goods vehicles who take up the entire width of the Potter’s Lane as they steam down the road ignoring any other vehicles and the speed limits. It is a daily occurrence that residents, trying to access their homes both as drivers and pedestrians, are verbally abused, cars damaged and are at risk of being run over as drivers regularly mount the pavement to get down the lane. I have witnessed this personally and it continues to get worse and this over development of Send will only exacerbate this.

This massive increase in traffic rat running to and from Woking along Potter’s Lane, Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock. We will become PRISONERS IN OUR OWN HOMES!

Attached documents:

Comment: MM9 - LPMM18/4710  Respondent: Darren Moss 17426593  Agent:
MM9 GREEN BELT POLICY.
These modifications claim to protect our precious GREEN BELT-they DO NOT! These are NOT very special circumstances?
GBC make an exception for limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered; this catch all statement is completely subjective, makes the edges of villages ‘open season’ to developers and therefore completely negates GREEN BELT PROTECTION policy.

Send CANNOT accommodate any commercial or huge housing developments. As villagers, at times, we cannot move in our vehicles to our places of work, this will also be the same for emergency vehicles, our village school is at capacity, secondary school placements are a huge problem, we fight to get a Drs appointments and know that our utility services in the area are already struggling.

Attached documents:

Comment: MM1 - LPMM18/4503  Respondent: Aldertons Farm Residents Company Ltd (Paul Norman) 17427713
Agent:

MM1 – Policy S1: Presumption in favour of Sustainable Development – this statement does NOT apply to the proposed residential development allocations for Garlicks Arch, Aldertons Farm, Burnt Common (London Road), Clockharn Nursery or the industrial/commercial development allocation at Send Business Park as all these sites are within the Green Belt and as such are protected against development by both National and Local Planning Policies regarding development within designated sites. Furthermore no Very Special Circumstances have as yet been put forward to justify such developments.

Attached documents:

Comment: MM2 - LPMM18/4504  Respondent: Aldertons Farm Residents Company Ltd (Paul Norman) 17427713
Agent:

MM2 – Policy S2: Spatial Development Strategy – it should not be necessary for GBC to contribute towards the housing allocation for Woking BC as they should address their own housing shortage without having to rely on neighbouring Boroughs to bail them out. It is understood that new wording in the NPPF document requires that Local Authorities should ‘share’ unmet housing needs ‘where it is practical to do so’ and also ‘consistent with sustainable development’. As the majority of the residential sites proposed in the GBC Draft Plan for the area, including Ripley, Burnt Common, Send Marsh and Send, are designated, and therefore protected, Green Belt sites, they are protected and are therefore not ‘practical’ or ‘sustainable development’ sites.

Attached documents:

Comment: MM27 - LPMM18/4510  Respondent: Aldertons Farm Residents Company Ltd (Paul Norman) 17427713  Agent:

MM27 – Policy ID2: DoT Road Investment Strategy – if it is inevitable that the local developments proposed around the A3 are to be a reality then it is acknowledged that road infrastructure will require major modification and improvement to
cater for the vast number of new homes and businesses thus created. Improvements to the A3/M25 junction 10 are well documented and now finalised, whilst the new slip roads on to the A3 at Burnt Common/Clandon Road will only funnel more traffic into the local areas causing substantial traffic chaos at peak times with the inevitable delays, increased air and noise pollution and a substantial negative impact on the village environment. More research is required into the latter proposal in order to avoid creating a hostile thoroughfare to feed the M25!

**Comment:** MM41 - LPMM18/4506  **Respondent:** Aldertons Farm Residents Company Ltd (Paul Norman)  
**Agent:**

MM41 – Policy A43 – Land at Garlicks Arch, Send Marsh/Burnt Common and Ripley – the increase of around 37% in housing provision for these sites is totally unacceptable, excessive and would lead to the amalgamation of the small Green Belt villages of Send and Ripley to the detriment of the character of the local area, furthermore at least one of the proposed sites is liable to flood and it should be noted that the owner of the land, a local farmer, ceased cultivating the fields as they flooded frequently. He was also unable to use the fields for grazing or livestock for the same reason and eventually let the fields as a game bird/clay pigeon shoot, resulting in the ground being contaminated with lead shot – a totally unsuitable environment for residential family development. As mentioned previously the additional traffic created would have a severe detrimental impact on the local road network, healthcare facilities, shops and schools.

**Attached documents:**

**Comment:** MM42 - LPMM18/4507  **Respondent:** Aldertons Farm Residents Company Ltd (Paul Norman)  
**Agent:**

MM42 – Policy A58: Land around Burnt Common, London Road, Send – the proposed increase in industrial and storage floor space from 7,000 to 14,800ft² would result in the largest such space in any of the local villages and without the Council providing the necessary information to justify such increase and no mention of any Very Special Circumstances. There has tended to be an over-supply of such facilities locally as can be evidenced by the unused capacity at the Slyfield Industrial Estate. This proposal is in addition to the proposed 25% increase at the Send Business Centre. Such an increase in floor area will result in additional heavy vehicle traffic movements, most likely 24 hours a day, 7 days a week and place an unacceptable strain on the local road network whilst increasing the risks of air and noise pollution.

**Attached documents:**

**Comment:** MM44 - LPMM18/4508  **Respondent:** Aldertons Farm Residents Company Ltd (Paul Norman)  
**Agent:**

MM44 – Policy A63: Land West of Aldertons Farm, Send Marsh Road, Send – as stated in items above this proposal is for inappropriate residential development within the Green Belt with no statement of justification, no indication of any Very Special Circumstances for the development and it is completely contradictory to MM9 Policy P2 as regards development within the Green Belt. The proposal for 120 houses is excessive and creates an overly dense form of development when gauged against the surrounding form of development which comprises a mix of detached and semi-detached bungalows and cottage style houses. A rough calculation of the local density for a site of the same gross area...
would indicate a figure of around 70 units as more in keeping with the character of the immediate area. A dense
development would detract from this rural character and what can now be regarded as a countryside street scene would
become much more suburban. The substantial increase in vehicular traffic would further impact on the Send Crossroads
and in the other direction increase the potential for incidents at the sharp bend in the road at Send Marsh Green which is
already quite dangerous.

Attached documents:

Comment: MM9 - LPMM18/4505  Respondent: Aldertons Farm Residents Company Ltd (Paul Norman) 17427713
Agent:

MM9 – Policy P2 – Green Belt – this policy states that the Metropolitan Green Belt will continue to be protected against
inappropriate development unless Very Special Circumstances can be demonstrated. To-date no Very Special
Circumstances have been put forward for these sites and therefore what the Council are proposing is inappropriate
development and should not be considered. Furthermore the Council would appear to be giving themselves the power to
re-designate Green Belt land on the edge of the local villages in order to create development sites outside of protected
status and to the detriment of the local village environment.

Attached documents:

Comment: Other comments - LPMM18/4509  Respondent: Aldertons Farm Residents Company Ltd (Paul Norman) 17427713  Agent:

We trust that the above objections are self-explanatory and would be grateful if the Council and the Planning Inspectorate
could carefully consider the objections raised as above in relation to the Main Modifications as currently proposed to the
Draft Local Plan, in order to secure a positive and safe future for Guildford Borough and its residents.

Attached documents:

Comment: MM41 - LPMM18/2041  Respondent: Valerie Ann Lazenby 17427777  Agent:

Objections to proposal planning.

SEND

As a Send resident for 23 years I find the present proposals quite incredible as the amenities in this area could not cope
with them.

MM41

I object to this increase in houses to 550 as already it can take me 10-15 minutes to get out of Sage[?] Drive during rush
hours & this will lead to more traffic. I also dont believe that the local schools or medical centre would be able to sustain
this increase.

Attached documents:
### Comment: MM42 - LPMM18/2042  Respondent: Valerie Ann Lazenby 17427777  Agent:

**MM42**

I object to this proposal as there is still lots of space at Slyfield you could use and you are already proposing to increase Send Business Centre so we get a double whammy.

**Attached documents:**

### Comment: MM9 - LPMM18/2043  Respondent: Valerie Ann Lazenby 17427777  Agent:

**MM9**

I object to these proposals as they really will impact on our Green Belt & turn Send & Ripley into one town.

I object strongly to the overloading that will take place if these proposals go ahead.

**Attached documents:**

### Comment: MM45 - LPMM18/1821  Respondent: Friends of Normandy Wildlife (Gill Woolfson) 17432737  Agent:

Dear Sir or Madam,

**Strategy and sites - main modifications: consultation on the Submission Local Plan MM45 Policy A64**

The Friends of Normandy Wildlife (FNW) is a local organisation which aims to foster an appreciation of the beauty and diversity of wildlife in Normandy and to protect it through recording sightings, educational talks and events and seeking protection for notable sites, habitats and species where required. The group has 50 paying members from Normandy and the surrounding area. It is organised by a Committee of experts in wildlife, conservation, communications and local knowledge.

The Committee of FNW has strong objections to the A64 proposal site at Flexford – amendment MM45 – being included because of the significant negative impact it would have on the site’s value for wildlife, its importance to the wider ecological network and the impact on the Thames Basin Special Protection Area.

At a strategic level, this land is in the Wanborough and Normandy Woods and Meadows Biodiversity Opportunity Area (BOA). This area is partly characterised by enclosed systems of small fields, hedgerows and ditches, which describes the proposed site well. Safeguarding BOAs through Local Plans fulfils the requirements of the National Planning Policy Framework to plan for biodiversity at a landscape scale and halt biodiversity decline through coherent ecological networks that are more resilient to current and future pressures.

At a site level, the assemblage of unimproved grassland, mature hedgerows and freshwater lake are of at least local significance.

The ecology report for the refused application 17/P/01413, also relevant to this site, shows that the grassland is an unimproved, moderately species-rich MG5 community of crested dog’s-tail – black knapweed. Diverse neutral grasslands
are considered important at a county and national level and MG5 communities are included within Surrey Site of Nature Conservation Importance criteria. In addition, the fields are very likely to be feeding grounds for barn owl which nests around 400m away and fledged five young this year.

The mature hedgerows and green lane consist of a mixture of several shrub species, providing excellent connective habitat through the site and into the surrounding landscape, which includes ancient woodland and a Site of Nature Conservation Importance that are almost immediately adjacent to the site. These hedges will provide flight lines for foraging bats and increasing light levels through development will be a barrier to continued use by bats even if the hedges are to be retained.

The combination of fields and hedges here are known to provide habitat for yellowhammers, a red-listed species of conservation concern in the UK, and badgers, a protected species; badger dung pits are clearly visible along hedge bottoms and setts may be present.

The aquatic value of the small lake is likely reduced due to being stocked for fishing, but it still provides a valuable freshwater habitat that is otherwise uncommon in the area and has value for a wide assemblage of wildlife.

Constructing housing of any size in this area also has an impact on the Thames Basin Heaths Special Protection Area. By car, the proposed development is twice as close to the heaths than the either of the permitted SANGs at Wood Street Village or Ash Lodge. On foot, the shortest route between the boundaries of A64 and the Wood Street SANG is a 20 minute walk; the SPA is a 4 minute drive. If there is no likelihood of a SANG closer than the SPA to the proposed development coming forward then the application should be refused. A proposal for only nine houses on this site was rejected in part for this reason by the Council in January 2018.

FNW also endorses points raised by Normandy Action Group and Guildford Residents Association that relate to erosion of the Green Belt between Normandy and Flexford and over-estimates of the housing required that is resulting in greenfield sites such as A64 being put forward. This is from the point of view that such policies will lead to further losses of countryside upon which our wildlife – much of it already in decline – depends.

The FNW Committee urge the Council to remove amendment MM45 from the Local Plan.

Thank you for considering our comments.

Attached documents:

Comment: MM41 - LPMM18/5996  Respondent: Anya Williamson 17434689  Agent:

I write to object to the following development plans currently under consultation:

MM41 Land at Garlick’s Arch, Send Marsh, Policy A43: I object to the Policy A43 change for the following reasons: - No ‘exceptional circumstances’ exist to justify this use of Green Belt land - The number of houses proposed has actually been increased, ignoring the thousands of previous objections already made by local residents - The site is ancient woodland from the time of Queen Elizabeth 1 and cannot be replaced - The development would effectively join up the villages of Send and Ripley, defeating the very purpose of Green Belt land - It is currently a Zone 2 Flood area and development will make matters considerably worse - It will generate massive amounts of additional traffic that the local road network simply cannot cope with

Attached documents:

Comment: MM42 - LPMM18/5997  Respondent: Anya Williamson 17434689  Agent:
MM42 Land at Burnt Common, London Road, Policy A58: I object to the Policy A58 change for the following reasons: - It was deleted from the 2014 draft as a direct result of the huge number of objections made previously - The parameters of allocation of land for industrial or warehousing use has increased twice, doubling the proposed area - Slyfield and Guildford still have empty sites and units. There is no need for this development in the middle of Green Belt land - The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole borough. An allocation of 10+ hectares just at Send in Green Belt land is utterly unnecessary - The increase in heavy traffic would cause gridlock on local roads, and an increase in air pollution and danger to local residents and children

Attached documents:

Comment: MM44 - LPMM18/5998  Respondent: Anya Williamson 17434689  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63: I object to the reinstatement of Policy A63 for the following reasons: - It was deleted from an earlier draft as a direct result of the huge number of objections made previously - No ‘exceptional circumstances’ exist to justify this use of Green Belt land - In conjunction with Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) this makes a total of 770 proposed new houses. Set against the existing 1700 houses in Send, this represents a staggering 45% increase. The village’s infrastructure simply cannot cope with this scale of development. - The proposals for Send are wholly disproportionate compared to other areas in the borough. Green Belt, Policy 2, paragraph 4.3.15: - The council’s assertion that exceptional circumstances allow for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village” introduces a subjective test, and effectively attempts to directly negate

Attached documents:

Comment: MM9 - LPMM18/5999  Respondent: Anya Williamson 17434689  Agent:

Green Belt Policy. To summarise, all these developments in Green Belt land have attracted many thousands of objections from local residents - they are not wanted, but more importantly, they are simply not needed. There are many brown field sites throughout the borough that have not been taken advantage of, only because they would not yield as good a profit for developers. Housing is needed, but it must be built in the right places, not just the most convenient or most profitable, and be accompanied with investment in local services for the huge increase in numbers of people that would come along with the proposed construction. The real tragedy is that were these developments in Send, Send Marsh and Burnt Common allowed to go ahead, the quality of life for existing and new residents alike would be much poorer than it is now. Local roads, schools and medical facilities are already fully stretched. There would be a considerable human cost for simply attempting to hit government targets.

Attached documents:

Comment: MM27 - LPMM18/1168  Respondent: Steve Nicoll 17434785  Agent:

5. MM27 MM41 MM42 and MM48 Transport Strategy
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine
words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

**Comment: MM41 - LPMM18/1164  Respondent: Steve Nicoll 17434785  Agent:**

Having previously objected to the Local Plan I would also like to record my further objection to the main modifications particularly those that adversely affect Send/ Ripley and the surrounding areas. What I find quite frankly astonishing, is the complete contempt and disregard shown towards the residents of Send and Ripley. The additional properties and the addition of an on/off ramp from the A3 at Burnt Common would have a such an adverse effect on the quality of life of existing residents that to completely ignore our views is quite frankly shocking and it will be us that will have to suffer the long-term adverse consequences for years to come.

It is quite frankly astonishing that between the Planning Inspector and Guildford Borough Council, you have both demonstrated a complete disregard for the views from the Send residents who have raised their concerns and have attempted to engage in the process then to be simply ignored is shocking.

How can it be satisfactory that any local authority could contemplate increasing the population of a village by 45% and think that will not have an adverse effect on the quality of life of the existing and new residents that will all have to share the services that were already stretched. Quite frankly the road infrastructure is strained and adding another 700+ homes and related traffic, will just grind the village to a halt, just imagine the level of carbon monoxide and sulphur dioxide the residents of Send will be subjected to.

My objections to the relevant Main Modifications are;

1. **MM41 Land at Garlicks Arch, Send Marsh, Policy A43**  
This wasn’t in the first local plan and there’s no reason why Send need this amount of housing so one can only imagine that Send has been selected to accept more than it should due to other parts of the borough not accepting their burden. Why can it be that the following points are being ignored?

- Increased from 400 to 550 homes of which 450 to be built in the first five years
- Increase of 37% in the number of houses proposed in the modifications is excessive.
- That 7000 objections to the previous lower number have been ignored.
- It is Green Belt containing ancient woodland.
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

**Comment: MM41 - LPMM18/1169  Respondent: Steve Nicoll 17434785  Agent:**

5. **MM27 MM41 MM42 and MM48 Transport Strategy**  
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.
2. MM42 Land at Burnt Common, London Road, Send, Policy A58

- Increased from 7000 sq m to a minimum of 14,800 sq m of industrial and storage
- Since being deleted from the 2014 plan this has been increased twice, doubling the area.
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
- The Employment Land Needs Assessment showed a reduction in demand for industrial land.
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous.

5. MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

3. MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

This wasn’t in the first local plan and there’s no reason why Send need this amount of housing so one can only imagine that Send has been selected to accept more than it should due to other parts of the borough not accepting their burden. Why can it be that the following points are being ignored?

- New site for 120 Homes including some self-build
- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads.
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.
### 5. MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

### 4. MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

**Attached documents:**

### Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to

- 40 houses and a travellers’ site on Send Hill,
- 60 houses at Clockbarn in Tannery Lane and
- A 25% increase in the size of the Send Business Centre despite the Wey Conservation area.

In summary I acknowledge and understand the need for additional housing and business in the borough but firmly believe that this local plan is not fair particularly around concentration, toward the residents of Send and Ripley and feel that overall this will be at the village’s detriment including those new residents planning to move into Ripley and Send.

Ripley and Send Village are already at capacity and I think GBC need to review the local plan and find an alternative solution that does not have a detrimental effect on existing communities that are already struggling for local services that are already oversubscribed.

This is a bad plan not thought through.

**Attached documents:**

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1902 of 2554
These are my comments on the proposed modifications to the Local Plan

MM2 (S2) The OAN appears to be significantly overstated in the light of the latest ONS household projections data. Working with an inflated OAN figure will mean unjustified sacrifice of previously protected Green Belt.

I object to the provision for Woking's unmet need. Woking have not carried out a thorough examination of their Green Belt sites to establish what capacity they have for meeting their own needs. In any case the revised ONS figures suggest their need has been overstated.

Attached documents:

Comment: MM27 - LPMM18/2308  Respondent: Jenny Wicks 17434817  Agent:

MM27 (ID2) The addition of 550 houses at Garlicks Arch, 120 at Aldertons Farm and a major industrial site at Burnt Common will add significant traffic to the A3, contributing to the cumulative impact of development on that road. These allocations, along with the development at Gosden Hill, will severely impact the A247 through Send and West Clandon which is unsuitable for increased traffic flows due its narrowness and alignment.

Attached documents:

Comment: MM3 - LPMM18/2307  Respondent: Jenny Wicks 17434817  Agent:

MM3 (S3) The town centre should be a strategic site with an accelerated, more ambitious town centre regeneration strategy to ensure more homes in this most sustainable of locations.

Attached documents:

Comment: MM2 - LPMM18/2498  Respondent: Philip and Maureen Blunden 17452673  Agent:

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

D. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways
England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)

2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph.

3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.

4. The sight lines for the exit of the Onslow Arms car park

5. The narrowness of the road near Summers

6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement.

7. The sharp bend near Clandon Regis

8. The narrowness of the road at the Bull’s Head.

9. The Clandon Junior School and the, in places, narrow footpath for children walking to school.

10. The sharp bend with poor sight lines in either direction at the church.

11. No continuous footpath through the length of the village

12. The speed of traffic

13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.
E. The Guildford Residents' Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2500  Respondent: Philip and Maureen Blunden 17452673  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:
MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**F. The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

**Attached documents:**

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**Comment: MM31 - LPMM18/2502  Respondent: Philip and Maureen Blunden 17452673  Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment: MM32 - LPMM18/2503  Respondent: Philip and Maureen Blunden 17452673  Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

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**Comment: MM33 - LPMM18/2504  Respondent: Philip and Maureen Blunden 17452673  Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.
Comment: MM35 - LPMM18/2505  
**Respondent:** Philip and Maureen Blunden 17452673  
**Agent:**  

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Comment: MM41 - LPMM18/2506  
**Respondent:** Philip and Maureen Blunden 17452673  
**Agent:**  

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

Comment: MM44 - LPMM18/2507  
**Respondent:** Philip and Maureen Blunden 17452673  
**Agent:**  

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

Comment: MM9 - LPMM18/2501  
**Respondent:** Philip and Maureen Blunden 17452673  
**Agent:**  

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Comment: MM15 - LPMM18/4511  
**Respondent:** Peveril Securities (Sir or Madam) 17459073  
**Agent:** WYG (Andrew Wells)  
We are instructed to make further representations to the proposed Main Modifications to the Local Plan as they affect land controlled by our client, Peveril Securities, between Walnut Tree Close and the River Wey. Previous objections were made to Policy E3 seeking to remove the Peveril site from the proposed allocation given it is being pursued for housing purposes and is suitable for such purposes (an application is shortly to be submitted for student housing on the site). In this regard it is noted that in the wider consideration of the scope for housing development within the Guildford urban area and Guildford town centre, the Council has made conclusions that (paragraph 5.3.8 of the sustainability appraisal addendum) “There are no sites within the wider urban area that might potentially deliver additional supply within the early part of the Plan period. Neither is there any potential for additional supply early in the Plan period at any of the sites that are allocations within the submission Plan”.

As has been indicated earlier in the Local Plan process and as part of the pre-application process which will shortly culminate in a submission for student housing on the site, the Peveril site is immediately available and deliverable for student housing which will have a knock on effect in reducing the housing requirement for Guildford – based on assumptions that the student housing provision within the Local Plan is taking up around 500 of the dwelling requirement previously assumed necessary in the borough. The objection to the inclusion of the Walnut Tree Close site as a strategic employment site in Policy E3 remains. A marketing report was submitted in association with an application for residential development on the site in December 2017 which demonstrated in any event the lack of deliverability of the site for employment (offices) in accordance with an extant planning permission. An updated report has been prepared to accompany the student housing application – see attached.

The 2018 NPPF in its section 11 (making effective use of land) states at paragraph 120 that “Planning policies and decisions need to reflect changes in the demand for land”. Where there is considered not to be a reasonable prospect of an application coming forward for the use allocated in the Plan the Council should consider the re-allocation of land for a more deliverable use that can help address identified needs.

In this case despite a permission for offices existing, the marketing of it has demonstrated no reasonable prospect of that scheme being implemented. It should therefore in accordance with paragraph 120 be de-allocated or allocated for residential development including student housing. In this regard the proposed allocation for employment purposes is in itself unsound given the location of the site which is effectively severed from the rest of the proposed allocation by the railway bridge. There are proposals for redevelopment for housing and student housing in the immediate vicinity and the western boundary is marked by the river within the conservation area and listed buildings. Part of the site has a car showroom on it which is being relocated. In environmental terms it is best suited for housing. Whilst offices were an acceptable option in environmental terms (see below) the lack of market interest in delivering the scheme would suggest in accordance with paragraph 120 of the NPPF that an alternative non-employment use should be allocated for the site.

Notwithstanding those comments, the proposed modification to Policy E3 (MM15 relating to policy paragraph 3 and 4) should be reconsidered. Paragraph 3 of the modifications seems to suggest that there should be marketing of all types of B Class use (the Peveril site is proposed for allocation for light industry, industry and storage and distribution) or indeed other employment generating uses before a change of use to residential would be permitted. This, however, does not reflect the fact that some sites would only be suitable for a certain type of employment use so there should not be a requirement to market for other forms of less suitable employment use. In the case of the Peveril site it has a planning permission for offices which in environmental terms is the most suitable use (for employment purposes) given its location close to the river and adjacent to a conservation area and listed buildings. Other B2 or B8 uses would be unsuitable given the location of the site so the requirement (as it would appear in the modification) to market it for unsuitable employment uses would be unnecessary and therefore unsound. The Council should reword this modification to allow a consideration of the suitability of B Class or other employment generating uses without the need to market them.

see attached for marketing statement

Attached documents:  Peveril Securities Rep_Redacted.pdf (18.0 MB)
REPRESENTATIONS TO GUILDFORD BOROUGH LOCAL PLAN - MAIN MODIFICATIONS

We are writing on behalf of our Client, Linden Homes, in respect of the main modifications into the Guilford Local Plan which are currently the subject of public consultation. Linden Homes are promoting land to the west of Westwood Lane at Flexford which could provide a sustainable and early contribution to housing delivery in Guildford Borough and deliver up to 350 dwellings.

The site has been continuously promoted through the Guildford Local Plan process with the site first being identified at the Issues and Options Stage of the Local Plan in 2013 and has been one of four sites assessed within the Local Plan evidence in terms of its suitability for delivering residential development at the village. Our Client has continuously challenged the conclusions of the Council’s evidence and site selection process and sought to demonstrate that of the sites promoted at Flexford, our Client’s is by far the most suitable of those available in light of the Council’s own evidence. This matter is of even greater importance now given GBC is considering allocating a site at Flexford through its main modifications which is not justified based on the evidence before the Examination which demonstrates the suitability, availability and deliverability of our Client’s sites within the early years of the plan period. A Vision Document has been prepared which demonstrates the opportunities for the site to the west of Green Lane at Flexford to deliver up to 350 dwellings. A copy of this Vision document is included at Appendix 1 of these representations.

The Inspector’s Note dated 22 June 2018 identified that regard should be had to an OAN of 630 dpa alongside consideration given to Woking’s unmet need. In addition, reference was made to the housing trajectory contained within the Submission Local Plan on account of the Inspector’s acknowledgement that ‘housing delivery in Guildford has been at a low level for a long time and the affordability ratio is very high and continues to worsen’. As such, the Inspector advises that ‘the Council should not adopt a stepped trajectory, but should identify additional sources of housing delivery in the early years of the Plan’.

In response to the comments made by the Inspector, the modifications commit to delivering a housing requirement of 630 dwellings per annum over the plan period alongside an additional 42 dwellings per annum to contribute towards Woking’s unmet need. This totals 672 dwellings per annum.

Our Client supports the Council’s commitment to increasing housing delivering in the early years of the plan period although we raise considerable doubt over how the Main Modifications seek to achieve this position.

As such, we have reviewed the relevant allocations which we do not consider that meet the tests of soundness under paragraph 182 of the Framework especially with regard to whether the main modifications proposed are justified and effective.

In summary, Linden Homes consider that the selection of a number of the additional allocations/sources of supply is flawed, do not represent sustainable development and will fail to address the shortfall in supply early in the Plan period. In contrast, the site promoted by Linden Homes at Westwood Lane, Flexford is sustainable and deliverable. There are significant flaws arising from the Council’s assessment (or lack thereof) of the allocations which it now proposes in order to overcome the Inspector’s concerns.

Attached documents:

Comment: MM2 - LPMM18/6087  Respondent: Linden Homes South 17461921  Agent: Turley (Hannah Bowler)

Assessment of Reasonable Alternatives

It appears clear from the above that there is no commentary or justification as to how GBC has considered whether particular settlements are appropriate to accommodate additional development. This is particularly relevant given our Client’s site has been discounted through the SA (2018) when in fact it scores better than a number of the new allocations
contained within the Main Modifications to the Local Plan. As a general point, the SA fails to consider the wider implications of the proposed allocations on the landscape and merely focuses on whether the site is within the AONB/AGLV. This is unjustified given one allocation is within the AGLV and another is adjacent to the AGLV and AONB which would have implications on the conclusions of the SA if it had robustly assessed the sites. We have enclosed a table below to demonstrate this position:

<table>
<thead>
<tr>
<th>Site GBC</th>
<th>Evidence base</th>
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| Land at Aaron’s Hill, Godalming               | SA - Amber - against railway station  
SA - Amber - against agricultural land  
SA - Red - against Health Care Facilities, District/ Local Centre, Secondary School  
The site is within the AGLV.  
Green Belt - Red rate sensitivity - not a potential development site. The Green Belt Study identifies that the parcel has significant constraints. |
| Land at Hornhatch Farm, adjoining New Road, Chilworth | SA - Amber- against railway station  
SA- Red against District Centre/ Local Centre, Primary and Secondary School  
SA - Red against Agricultural Land- Best and Most Versatile  
The site is in close proximity to the AONB and AGLV although there is no criteria within the SA to consider this impact  
Green Belt - Red rated sensitivity. Identified as a potential development site within the Green Belt Study. |
| Land at Aldertons Farm, Send Marsh Centre,     | SA - Red - against District/ Local Primary and Secondary Schools  
SA - Red - against accessibility to train station Best and most versatile agricultural land  
Green Belt - Amber rated sensitivity - a potential development site  
No consideration given to cumulative impact of further development at Send/ Send Marsh as raised through the SA (2017) |
| Land east of Glazier Lane                     | SA - Green- against railway station  
SA - Red - against District/ Local Centre, Primary School and Health Care  
Green Belt - Green Belt - Red rated sensitivity - a potential development site. Identified as a potential development site within the Green Belt Study. |
| Land between Beech Land and Westwood Lane, Flexford (our Client’s site) | SA - Amber - against railway station  
SA - Red - against District/ Local Centre, Primary School and Health Care |
SA - Amber - against agricultural land
Green Belt - Amber rated sensitivity - a potential development site. Identified as a potential development site within the Green Belt Study.

With regard to the above, it is clear that our Client’s site scores better than other proposed allocations within the Main Modifications. The above assessment is particularly relevant on account of the justification that GBC has provided within the SA (2018) for discounting our Client’s site as a proposed allocation through the main modifications. This is cited on Page 16 of the SA which states that ‘Land east of Glaziers Lane benefits from better proximity to the train station’. This appears to be the over-riding consideration for it being sequential preferable to our Client’s site. This position has no regard to other site specification considerations especially given Glaziers Lane is identified as red-rated Green Belt (therefore of greater significance to the Green Belt than our Client’s site).

When considering our Client’s site against the other sites considered (in our view GBC has failed to consider ‘all’ reasonable alternatives through the main modifications), there is limited or no justification/commentary as to why it was not included as a further allocation based on the Council’s own evidence. A high level review of the sites contained in the table above compared to our Client’s is set out below:

- Our Client’s site would not involve the loss of the best and most versatile agricultural land unlike allocations at Hornhatch Farm and Send Marsh
- Our Client’s site scores amber against Green Belt sensitivity and was identified as a potential development site unlike Aaron’s Hill
- Our Client’s site scores amber against Green Belt sensitivity and was identified as a potential development site unlike Hornhatch Farm and Glazier Lane which whilst identified as potential development site’s scored red against Green Belt sensitivity
- Our Client’s site is more accessible to a train station unlike the allocation at Send Marsh
- Our Client’s site is located within the same proximity to local facilities as the other allocations
- Our Client’s site is not constrained by being within or adjacent to the AGLV or AONB unlike the allocations at Aaron’s Hill and Hornhatch Farm
- Our Client’s site is not constrained in terms of early delivery by the requirement for significant highways works unlike Garlick’s Arch which will impact on its ability to increase housing output in the first five years of the plan period
- Our Client’s site would round off Flexford to the west and would not result in an out of character form of development unlike Glaziers Lane which result in the sprawl of Flexford north of the railway towards Normandy (identified within the Council’s evidence as two separate settlements)

In summary, the approach taken by GBC within its main modifications is unjustified and it is clear that the Council’s has not formed reasonable conclusions as to why our Client’s site was not proposed for allocation especially given its own evidence identifies that it is significantly less constrained in terms of environmental and planning considerations than others which it has selected.

GBC should be considering ‘all’ reasonable alternatives as part of the SA process not limiting this to each settlement. The Council’s approach is wholly unjustified and has resulted in identifying sites that score strongly against the purposes of the Green Belt being identified for release, have poorer accessibility to train stations and will have a greater landscape impact (AONB/AGLV) than our Client’s site based on GBC’s own evidence base.

**Sites at Flexford**
The SA (2018) re-considers the Green Belt Potential Development Sites which related to four sites as shown in the image below.

We have the following comments for each parcel:

- Parcel A - incorporates part of our Client’s site as is discussed below
• Parcel B - would be a significant extension northwards of Flexford and breach the existing physical boundary of the train railway line and would be out-of-character to the existing linear development of Normandy. The SA acknowledges this position.
• Parcel C - would be a significant extension northwards of Flexford and breach the existing physical boundary of the train railway line and would be out-of-character to the existing linear development of Normandy
• Parcel D - the site is identified as a SNCI and it has been discounted by GBC.

However, the SA fails to explicitly explain as to why the other sites at Flexford (including our Client’s site) have not been considered further for allocation. Limited commentary is provided within Box 5.3 which explicitly states that our Client’s site was only discounted on account of distance to the train station. This is unjustified and GBC should be considering whether the site should be considered for allocation against ‘all reasonable’ alternatives as oppose to looking at each village in isolation.

In comparison to Glaziers Lane, our Client’s site scores an amber sensitivity to the Green Belt (in comparison to high sensitivity) and Volume III of the Green Belt Study acknowledges the presence of ‘defensible boundaries’, thus it being considered as a potential development site. In comparison to our Client’s site, Glazier’s Lane will result in the extension of Flexford northwards towards Normandy beyond the existing railway line which is considered to be a robust and defensible boundary. Whilst Glazier’s Farm is indeed slightly further from Wanborough Station than Glazier Lane, it is less environmentally constrained and is in fact closer to a station than other allocations proposed by GBC through its main modification allocations - thus this justification for the exclusion of the site is weak and unjustified.

A Vision Document has been prepared which demonstrates the opportunities for the site to deliver development that aligns with the character of Flexford and responds to the site opportunities/constraints which are discussed further below.

Attached documents:

**Comment:** MM39 - LPMM18/6080  **Respondent:** Linden Homes South 17461921  **Agent:** Turley (Hannah Bowler)

**Land at Aaron’s Hill, Godalming**

This is an additional allocation within the Local Plan Main Modifications and was identified within the LAA (October 2017) as site 2254 and falls within the Green Belt. The Green Belt Study identified the site as within parcel F18 and stated that ‘F18 ‘located to the north east and west of Godalming are generally physically separate from the settlement boundary of Godalming’/ with the Study concluding that overall the parcel was located ‘within high sensitivity Green Belt’. Furthermore, the Study highlights that the parcel exhibits ‘ significant constraints with no PDA’s identified’ and ‘the borough boundary is generally physically separated from the settlement boundary within land parcel F18 therefore any development would not be continuous with the settlement boundary, unless future development was bought forward to the west of Godalming within Waverley District. Therefore it was not considered appropriate to identify a PDA on the borough boundary adjoining Godalming within Guildford Borough’.

Whilst it is appreciated that Waverley Borough has committed to the delivery of residential development at Aaron’s Hill through its Local Plan Part 1 (adopted in February 2018), the constraints of the site itself are still present and the GBC’s evidence does not support the inclusion of the site as a proposed allocation based on an ‘assessment of all reasonable alternatives’. The constraints identified for F18 are as follows:

• River Wey Flood Zone
• SSSI
• AGLV
• Areas of High Archaeological Importance
• Lower Eashing Conservation Area
With regard to the assessment of the site within the SA (2017), the assessment reaffirms the site’s redrated Green Belt and AGLV status. The site scores poorly against the proximity to a district/local centre, health care facility and secondary school. In addition, page 129 re-iterates that the site is within c.1km of Godalming town centre ‘as the crow flies’ although this is via a public bridleway that is through woodland, step in parts and crosses the railway line’. In addition, the SA discusses that the site is on a hill above the River Wey.

In comparison, the updated SA (2018) fails to fully re-consider Aaron’s Hill although does continue to emphasise the constraints such as heritage, AGLV and flooding. Interestingly despite the conclusions of the SA (2017), paragraph 7.2.1 now states that the site benefits ‘from very good accessibility to Godalming town centre and train station’. Whilst the SA makes continued reference to the Waverley allocation this position was still applicable at the time of the SA (2017) when WBC was sufficiently advanced with its Local Plan and GBC did not wish to proceed with the site at this time.

Given the above, we do not consider that the allocation of the site is justified when considered against all reasonable alternatives on account of the significant environmental constraints on site (with no evidence as to how these would be addressed) alongside poor accessibility of the site to local facilities and public transport. In addition, the allocation of the site undermines the Council’s draft policy P1 which seeks to retain the AGLV until such time a review of the AONB has been undertaken. Any development proposals will need to demonstrate that it will not harm the setting of the AONB or the distinctive character of the AGLV.

In summary, we question how GBC consider the site to be a ‘reasonable alternative’ when other sites outside the AONB and AGLV have been discounted and is a site which will undermine the draft Local Plan and which is not supported by any landscape evidence to demonstrate itself ability to appropriate accommodate development. The proposed allocation is unjustified when considering paragraph 182 of the Framework.

footnotes 1 Paragraph 24.10 of the Green Belt Study
2 Page 542 of LAA

Attached documents:

Comment: MM41 - LPMM18/6079 Respondent: Linden Homes South 17461921 Agent: Turley (Hannah Bowler)

Land at Garlick’s Arch, Send Marsh Burnt Common

The Main Modifications seek to increase the provision of the above site from 400 dwellings to 550 dwellings over the plan period. The updated trajectory seeks to increase provision in 2020/2021 from 50 dwellings to 65, 2021/2022 from 50 to 85 and a further 100 dwellings in 2024/2025. As far as we have been able to establish, there is no evidence before this Examination to demonstrate that this additional capacity can be achieved and the delivery rates proposed are realistic.

Allocation A43 states that the main vehicular access to the site allocation will be provided on the A247 frontage. We note that the proposed allocation of site A43 does not itself interface with the A247 but that in any event there are only limited opportunities for this access to be formed (given the presence of the existing dwellings to the east of the A247). However the issue of access into this site is compounded by the intention for significant highways improvement works to be undertaken at the A3 in this area. The boundary of the Garlick’s Arch allocation (A43) is generally contiguous with the land to be allocated (under allocation A43a) for new north facing slip roads to/from A3 at Send Marsh/Burnt Common. The Local Plan allocation A43a describes these works as “New northbound onslip to the A3 trunk road from A247 Clandon Road and a new southbound offslip from the A3 trunk road to A247 Clandon Road.” Given that the main access into allocation A43 is to be from the A247 (and the limited opportunities to achieve this), we consider that this will be reliant upon the timings of the highways works in this area.

In our submission, it must be that the main vehicular access into the Garlick’s Arch allocation is intrinsically linked to the works to be undertaken to provide the northbound slip from the A247 onto the A3 under allocation A43a. The
The significance of this is that Appendix C to the emerging Local Plan states that these works are to be undertaken between 2021 and 2027. Despite the phasing of this works, the Main Modifications expect that housing will be phased at Garlick’s Arch as follows: 65 dwellings in 2020/21; 85 dwellings in 2021/22; 150 in 2022/23; 150 in 2023/24; and 100 in 2024/25. On that basis, the housing trajectory envisages that a significant number (more than 10%) of all the dwellings at Garlick’s Arch will be completed before the works under allocation A43a have even commenced.

Whilst we understand that the promoters of the Garlick’s Arch scheme may be able to achieve a secondary access from the B2215 alongside the site’s northern boundary, we expect that the phasing of the slip onto the A3 from the A247 is likely to restrict the delivery of housing at this site, particularly given that this is to be the key vehicular access.

On the basis of the comments set out above, we consider that GBC has been overly optimistic about delivery rates at this site. The act of increasing its capacity will fail to resolve the Inspector’s concerns about delivery rates early in Plan period.

**Attached documents:**

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**Comment: MM43 - LPMM18/6081  Respondent: Linden Homes South 17461921  Agent: Turley (Hannah Bowler)**

**Land at Hornhatch Farm, adjoining New Road, Chilworth**

The SA (2017) identifies the site as red-rated Green Belt although was not subject to any other constraints and was assessed on the basis of 80 dwellings on-site. The site scored poorly against accessibility to the District/ Local Centre, Primary School and Secondary School although scored amber against accessibility to a train station (the same as our Client’s site). In addition, the site is adjacent to the AGLV and in close proximity to the AONB alongside being identified as the ‘best and most versatile agricultural land’. We consider that there is limited commentary on why the site is appropriate compared to all reasonable alternatives within the SA (2018).

Within the Green Belt Study, the site falls within parcel E51 and was specifically identified as parcel 51B within Volume III Appendix VI. The site was identified as a potential development area although reference was made to the any development being partially constrained by the AONB.

We consider that the site does not score any higher than our Client’s site against the SA objectives and is in fact further away from the railway station in Chilworth than our Client’s site in Flexford. Furthermore the site at Chilworth is ‘red rated’ in terms of its Green Belt sensitivity when compared to our Client’s site scoring amber. No landscape evidence has been submitted demonstrate that policy P1 will not be undermined through this allocation especially given recognition with the Council’s evidence of the proximity to the site to the AGLV and AONB. There is no justification as to why the site is sequentially preferable over our Client’s site.

**Attached documents:**

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**Comment: MM44 - LPMM18/6082  Respondent: Linden Homes South 17461921  Agent: Turley (Hannah Bowler)**

**Land west of Alderton’s Farm, Send Marsh Road**

The SA (2017) identifies the site as amber rated Green Belt and was assessed on the basis of 100 dwellings. The site scores poorly on against accessibility to district/ local centres, primary and secondary schools, alongside a railway station. In addition, the site would result in the loss of Best and Most Versatile Agricultural Land. The SA further raises concerns over an additional allocation at Send Marsh resulting in ‘in combination effects’.
The SA (2018) considers the delivery of 120 homes on the site and further states at paragraph 9.10.1 that ‘the proposed package of additional allocations is perhaps less than ideal on the basis that Alderton’s Farm is known to comprises ‘best and most versatile’ agricultural land with the site being within 400m of the Papercourt SSSI (para 9.2.2). Given the findings of the SA (2017), it is concerning that the cumulative effects on Send/ Send Marsh has not been considered robustly to inform the spatial strategy not being put forward through the main modifications.

The Green Belt Study identifies the site as B15 and was identified as potential development area under B15C with the estimated development capacity as 116 dwellings.

Whilst the site scores amber against Green Belt sensitivity, it scores poorly against local facilities and the train station. In addition, it would result in the loss of the best and most versatile agricultural land unlike our Client’s site. We have further concerns that GBC has not robustly considered the cumulative effects, as identified within the SA (2017), of the level of development proposed and Send/ Send Marsh on account of this additional proposed allocation. It is noted that further development at Flexford beyond the proposed allocation at Glazier Lane has been discounted yet further development is proposed at Send Marsh despite reservation contained within the SA (2017).

Attached documents:

Comment: MM45 - LPMM18/6034  Respondent: Linden Homes South 17461921  Agent: Turley (David Murray Cox)

We write on behalf of our client, Linden Homes and are aware that Guildford Borough Council is currently undertaking consultation on the Main Modifications to the Local Plan arising from the Examination.

Linden Homes are promoting land at Westwood Lane, Flexford which has the potential to accommodate up to 350 homes as demonstrated by the enclosed Vision document.

This site is controlled by Linden who are committed to early delivery at this site in the event that it is allocated for development. We note that the Council has proposed to allocate land at Flexford in the Main Modifications and we support that approach in principle as it enables modal shift away from the private car given the presence of Wanborough railway station.

In contrast to the Council’s proposed allocation at Flexford, the land at Westwood Lane maintains the existing settlement pattern being located to the south of the railway line. Moreover this site has been assessed as being less significant in Green Belt terms than the land proposed for allocation at Glazier’s Lane, Flexford.

In comparison the site’s identified by the Council, the site (through the Council’s evidence) is assessed as follows:

- Not the best and most versatile agricultural land unlike allocations at Hornhatch Farm and Send Marsh
- Scores amber against Green Belt sensitivity and was identified as a potential development site unlike Aaron’s Farm, Hornhatch Farm and Glaziers Lane
- Is more accessible to a train station unlike the allocation at Send Marsh
- Has the same proximity to local facilities as the other allocations
- Is not constrained by being within or adjacent to the AGLV or AONB unlike the allocations at Aaron’s Farm and Hornhatch Farm
- Would round off Flexford to the west and not result in an out of character form of development unlike the site to the north of the railway line at Glaziers Lane

We will be responding to the Main Modifications consultation in due course. However we hope that this letter is useful and highlights the continuing availability of this site. It is, as is highlighted by the Council’s own proposals, at a settlement which is suitable for growth, but with a lesser impact on the Green Belt. As such, we would be grateful if
GBC’s Planning Policy team would continue to have regard to its availability and suitability to accommodate housing development.

We hope this submission is useful. Please do not hesitate to contact if you wish to discuss this matter further. Our representations have been submitted.

Attached documents:

**Comment:** MM45 - LPMM18/6083  **Respondent:** Linden Homes South 17461921  **Agent:** Turley (Hannah Bowler)

**Land between Glaziers Lane and Strawberry Farm, Flexford**

The SA (2017) considers the site for 100 dwellings and acknowledges the site is red-rated Green Belt and would introduce in-depth built form north of the railway, although it is in very close proximity to Wanborough train station (para 6.6.16). Such a position is contradicted by footnote 36(A) on page 32 which states that ‘the site is on the edge of the village relatively distant from the train station’. Page 129 states that the site ‘has a water body and stream at its eastern extent and falls within the Wanborough and Normandy Wood and Meadows BOA. The SA (2018) reiterates the comments above.

The Green Belt study identifies the site as red-rated and within parcel H10. The site was identified as parcel H10B and is identified as a potential development area. This said, it is clear that the site breaches the existing railway line with the settlement of Flexford to the south. In addition, as identified within the SA, the development of the site - besides a small scale linear development- would result in in depth form. No consideration has been given to these matters in the Council’s evidence.

Our Client has concerns that not only does the proposed allocation breach the existing boundary of the railway line and would undermine the character of the linear pattern of development of Normandy but results in removing Green Belt land which scores higher sensitivity to Green Belt than our Client’s site.

Attached documents:

**Comment:** MM45 - LPMM18/6093  **Respondent:** Linden Homes South 17461921  **Agent:** Turley (Hannah Bowler)

**Land at Westwood Lane, Flexford**

We have submitted representations in relation to the suitability, availability and deliverability of the site for residential development through the Local Plan Examination. For ease, these representations are enclosed at Appendix 2. On the basis of the concerns identified above, the additional sites proposed for allocation through the Main Modifications are not considered to be the ‘reasonable alternatives’ based on the Council’s own evidence. GBC has failed to justify why our Client’s site has discounted at this time.

In addition to the above, a Vision Document (enclosed at Appendix 1) has been prepared to demonstrate the opportunities for the site to deliver new development in light of technical considerations and accessibility. The site itself is within 800m of Wanborough railway station and is accessible to a range of local facilities within a maximum of a 20 minute walk from the site. Baseline survey work has been undertaken in relation to the technical constraints/ opportunities of the site which has led to the following design principles:

- Sensitive development to the east of the site in response to the existing housing on the boundary edge;
• The landscaping strategy should retain and enhance trees and hedges, particularly the high quality field boundary trees, to support ecology and biodiversity
• A 15m buffer to be provided to the off-site Ancient Woodland
• Additional planting and other landscape measures should be implemented to the western site boundary to create a strong landscape edge to the settlement
• The site should feature a sustainable drainage system working with the topography of the site.

In light of the above, the site could accommodate up to 350 dwellings with primary vehicular access from Westwood Lane. In addition, pedestrian links could be provided through the development linking to the surrounding PROW’s and road network. An indicative layout is shown below (as contained within the vision document).

Summary

Overall, the additional allocations proposed within the Main Modifications to the Local Plan are unjustified and based on a lack of sufficient evidence to demonstrate that ‘all reasonable alternatives’ have been robustly considered within the SA. In our view, some of the proposed allocations could significantly undermine policies contained within the draft Local Plan and could result in adverse landscape impacts which cannot be fully considered on the basis of a lack of evidence supporting this consultation. We do not consider there is sufficient justification at this time to demonstrate that the main modifications are the most appropriate strategy for the emerging Local Plan.

The land at Westwood Lane, Flexford is a suitable and sustainable location for development. It is not at risk of flooding, not subject to ecological designations or interest, is not subject to national or local landscape designations, sits within an enclosed landscape and is not at risk of flooding. Moreover, the site is approximately 800 metres from Wanborough train station and therefore offers the opportunity to support modal shift away from the car, including for trips to Guildford. The site is also close to existing bus services, such as the 694 school bus route which runs from Christmas Pie via Puttenham to Broadwater School, the 520 runs five buses per day both ways between Aldershot and Guildford via Flexford. The PT5 service provides a school bus service to St Peter’s School running during term and operates between Ash and the school.

The land at Westwood Lane, Flexford is also deliverable. The involvement of a national housebuilder highlights its availability for development and it is notable that this site is not subject to any restrictions which might arise as a result of the need for infrastructure delivery for example. Linden Homes consider that this site would be achievable within 5 years and on the basis of the comments set out above, encourages the Council to support the allocation of the land at Westwood Lane, Flexford.

see attachment for appendix

Attached documents: Turley Hannah Bowler Rep_Redacted.pdf (9.6 MB)

Comment: MM13 - LPMM18/5074  Respondent: John Maycock 17462145  Agent:

MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing. The GRA adviser suggestion referred to under MM2 above is relevant here.

Attached documents:
Guildford Borough Council Local Plan
Strategy and Sites - Main Modifications 2018

I wish to object to modifications to the Local Plan as indicated below.

**MM2** The housing target set out in the Plan is wrong on the latest evidence. The public examination should be reopened so that the latest figures and household projections from the Office of National Statistics can be taken into account. These projections give new lower population and household figures correcting the flaws that previously inflated Guildford's housing figures by overestimating how many students stay and have children after their course finishes.

I understand that the Guildford Residents Association (GRA) has been advised by a leading national expert, who has calculated that a more realistic figure for extra homes is 360 rather than the 672 currently proposed in the Local Plan. This advice suggests that the present development proposed by The Local Plan in the Green Belt is simply unnecessary and cannot be justified. This new lower figure would also make it more achievable to bring forward well-planned, sensitively-designed housing in the town centre in a faster timescale than presently proposed.

**MM2** There should be no requirement for Guildford to take Woking's "unmet need", particularly as this will require further green belt release. Presumably, this "unmet need" will also be based on projections now found to be inaccurate on the basis of the latest ONS figures.

The council has not properly followed its own spatial strategy, which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road, Ripley which has not been properly considered.

**Attached documents:**

**Comment: MM23 - LPMM18/5076  Respondent: John Maycock 17462145  Agent:**

**MM23** Policy 01 waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes). Development without proper consideration of these factors will lead to development without any social connection to its immediate surroundings or those nearby.

The above is amplified by the fact that strategic sites are to be exempt from design constraints.

There is no evidence that recent case law, such as the recent European Court of Justice "People over Wind" decision, has been taken into account.

**Attached documents:**

**Comment: MM3 - LPMM18/5078  Respondent: John Maycock 17462145  Agent:**

**S3** The town centre policy is inadequate and, quite apart from comments above under MM2 and MM13, does not address the infrastructure deficit.

**Attached documents:**
SITE SPECIFIC - A35 - Three Farms Meadows
The addition of land to the south of the appeal site does nothing to mitigate the density issue already much discussed in previous planning appeals as much of the new land added to the site is constrained by the VOR.

Attached documents:

MM41 Transport strategy in the Local Plan relies on inadequate modelling. The delay of at least two years to the J10 Highways England RIS scheme will have a knock-on effect on all development that relies on this scheme (e.g. Site A35 - Three Farms Meadows; MM41 site A43-Garlicks Arch; MM44-Aldertons Farm).

There is too much reliance on A3 (Guildford) improvements that are beyond the council's control and have no fixed timescale.

Attached documents:

MM9 Infilling in and around villages will inevitably result in the weakening of protection of the countryside.

Attached documents:

MM27 MM41 MM42 and MM48 Transport Strategy
All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

Attached documents:
Comments on MM for the Guildford Local Plan

I would like to make the following comments on your plans for the proposed sites:-:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

I Object to the proposal to increase the number of homes on this site from 400 to 550.

Anyone who has actually visited the site will see how unsuitable it is.

I object to the number of homes being increased by 37%. With an average of 2 people per house and often as we all are realistically aware this means 2 cars. This also will mean a possible 1000 plus residents who will all require access to roads and amenities – medical facilities, schools, leisure!

The overwhelming and compelling evidence was strongly presented by various groups at the Council meeting. They stated very clearly how unsuitable the site was and the council’s representatives had few answers to these comments. We fail to understand how the Inspector has concluded that the site should be increased, and not scrapped is astonishing especially with all the evidence presented to him, unless of course this was his directive from the Council all along, regardless of evidence.

It is likely this will add over 750 additional cars to the traffic in the surrounding area. Access to both Guildford and Woking would add to the already present traffic jams at Send Dip and the Burnt Common Roundabout. Send Road is already the main access road between Woking and the M25 carrying heavy goods vehicles and articulated trucks. The road through Ripley is often already gridlocked at commuter times when traffic is heading to the A3 and some traffic wishes to turn out of or into Newark Lane!

There is nothing in the Local Plan about additional road infrastructure so the current small roads we currently have which are over-crowded already will simply not be able to cope. If the other proposed sites all go forward then these roads will simply gridlock making life a misery for everyone concerned. There is a serious safety angle to this problem as cars bunch and speed limits are broken to enable to get from A to B on time. The situation will be far worse during weekdays. The additional traffic which will result from the excessive building programme in Send will make the situation far worse and in all probability result in gridlock at this point as well as Newark Lane.

With the additional houses there will inevitably be families requiring schools for their children. There will be only one primary school for the villages of Send and Ripley since the recent closure of Ripley School. Secondary provision is also very restrictive, George Abbot is the nearest secondary school and for many years the children of Send and Ripley do not get into the school due to it being over-subscribed. The next nearest school is the Howard of Effingham and Hoe Valley which also currently do not take children from the villages. The secondary school of preference to the Council appears to be in Sheerwater because there is no alternative secondary school provision for the children currently living in Send and Ripley.

There are no plans to build any new schools, surgeries, dentists or amenities.

More houses will mean the current amenities will be over stretched and unable to cope.

I fail to understand these plans.

MM27 MM41 MM42 and MM48 Transport Strategy

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.
Currently buses run one an hour to Woking and so people are forced to use cars.

Attached documents:

**Comment: MM42 - LPMM18/4713  Respondent: Diana Bridges 17463169  Agent:**

**MM42 Land at Burnt Common, London Road Send, Policy A58**

I object at the proposal now to double the original area proposed especially in view of the increased capacity at the Send Business Centre and the spare capacity at Slyfield in Guildford. This will also generate additional traffic consisting of vans and larger vehicles which will all travel through the narrow and as stated earlier the already busy and congested roads of Send and Ripley. This will add to further congestion and noise and air pollution.

It seems to make far more common sense which people fail to use to centralise and develop Slyfield Industrial Estate where there is already the existing infrastructure and also spare capacity.

Common sense appears to be missing once again in the council with the failure to use what is already there to be used and developed.

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

Attached documents:

**Comment: MM44 - LPMM18/4715  Respondent: Diana Bridges 17463169  Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

I object to the proposal for 120 homes at this location which is a wholly unsuitable development in such an area and for the same reasons as the other locations in Send; namely excessive pressure on local services and additional traffic on a road system which was never intended for such potential traffic volumes. Again at this point 120 houses will more than likely mean 240 cars and the same amount of children requiring schools and a presumption of families requiring medical care at the one surgery serving the two villages.

The only way in and out of this site is through Send Marsh Road which is unsuitable to carry this amount of extra traffic generated by this many houses. Access either end, at Send Dip and Mays Corner onto Send Road is already very difficult due to the congestion through Send and Ripley and the result will be long traffic jams along Send Marsh Road. At commuter times the cars are already queued to either turn left or right depending whether they want to go south or north on the A3 from Send Dip.
This is prime green belt land and there is no reason to make an exception for housing here. There are many other areas outside of the greenbelt or on brownfield sites which can be selected. GBC do not have any explanation as to the reason for the exception to put this land on greenbelt land for this site and I fail to see why the Council elect not to prioritise brownfield sites.

Once again the evidence presented and the objections already submitted have told the council that this is not acceptable to the villages of Ripley and Send with clear reasons for their objections. This overwhelming reaction of the public has told and made their objections to the elected Council in the manner requested, but it seems that the actions of the council is to continue with their plans regardless.

Attached documents:

**Comment: MM48 - LPMM18/4719  Respondent: Diana Bridges 17463169  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry and there are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

Attached documents:

**Comment: MM9 - LPMM18/4716  Respondent: Diana Bridges 17463169  Agent:**

**MM9 Green Belt Policy**

This can hardly claim to be a policy when the above developments all impinge on the existing Green Belt which GBC seem prepared to sacrifice. Following GBC’s logic, all greenbelt land can be sacrificed and therefore is able to be built on. This breaches all GBC’s own policies and government directives.

Attached documents:

**Comment: Other comments - LPMM18/4721  Respondent: Diana Bridges 17463169  Agent:**

**General feedback**

I really don’t understand why it is necessary to comment again on these sites.
GBC do not appear to be following a democratic process. There have been over 7000 objections from Send and Ripley which is a very loud and clear message to say GBC have got it wrong. Now we are effectively gagged and can only comment on modifications to proposals which appear to be presented as a ‘done deal’.

I do not feel both my own and those of the many residents I know who all share the same feeling are being listened to and each time a plan is presented it is modified to an even more concentrated plan.

We in Send have expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before.

The opening paragraph to the local plan states

“Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough’s most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, supported by suitable infrastructure including education, healthcare and transport. The new Local Plan will be in place until 2034.”

Furthermore there are signs at various points proclaiming

“The Surrey Hills an area of Outstanding Natural Beauty.”

The Guildford Plan has been presented almost as a “job done” situation and the complete lack of listening to resident’s views can only be seen as devastating and contrary to local reaction completely.

If 7000 objections does not get the message across then I fail to see what GBC need to get the message that they have these proposals completely wrong.

Attached documents:

Comment: MM2 - LPMM18/3986  Respondent: John Patterson 17464577  Agent:

To whom it may concern, I would like to make the following objections with regard to the the local plan given that the whole thing is based on inaccurate ONS data:

5.2-1 The household projection is using out of date information! The new household projections (Sept 2018) show a substantial drop in the number of households and therefor the plan is based upon fundamentally unsound data. The same issue applies to S2-2. Given this difference the public examination must be re-opened!

S2.4 – 4 Due to the changes in the household figures…the proposed strategic sites (2) specifically those on greenbelt must be removed.

S2.5 Also the 5 new sites included in the plan (for early delivery) should be removed.

Attached documents:

Comment: MM3 - LPMM18/3987  Respondent: John Patterson 17464577  Agent:

MM3 S3.1 although the new plan finally includes a policy on the town centre it is too vague, rambling with no details of what is exactly proposed! This is unacceptable and looks like a last minute job!
SUBMISSION LOCAL PLAN: STRATEGY AND SITES - MAIN MODIFICATIONS

These representations have been prepared on behalf of Guildford College Group (GCG) who own Land at Liddington Hall Farm (LHF) in Guildford. They are submitted in response to Guildford Borough Council’s (GBC) consultation on its Submission Local Plan: Strategy and Sites - Main Modifications.

On behalf of GCG, we have promoted land at Liddington Hall as a potential residential site (together with the removal of the Merrist Wood Campus (MWC) from the Green Belt) since 2015 and submitted representations in July 2016 and again in July 2017. We also appeared at the Local Plan examination hearing sessions in June and July 2018.

We continue to be disappointed with the council’s lack of support for the GBG and the potential that both GBG sites have for residential and educational uses respectively. The council will be well aware of the financial predicament of the GBG and the importance that the allocation of the LHF site would have for the long-term future of the College. We remain firmly of the view that the LHF site, in part or as a whole, can contribute a meaningful number of homes (up to 300) in years 1-5 of the Draft Local Plan, adding further flexibility into the supply and resilience to the emerging Plan. We also believe the site is a more sustainable and appropriate location for housing development than those additional sites proposed for allocation in the Main Modifications to the Plan.

In fact, we believe the proposed additional sites are illogical when read alongside the Sustainability Appraisal Addendum (2018) and that there has been no real desire to align with the spatial strategy as set out at Policy S2 of the draft Plan. We therefore believe that the Draft Plan as modified continues to be unsound.

These representations are focused on and limited to the following main modifications as set out in the latest consultation document.
• MM2: Policy S2: Planning for the borough - our spatial development strategy
• MM27: Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”;
• MM9: Policy P2: Green Belt
• MM39: A61 – Land at Aaron’s Hill, Godalming
• MM42: A62 - Land at Hornhatch Farm, adjoining New Road, Chilworth;
• MM43: A63 - Land west of Alderton’s Farm, Send Marsh Road, Send; and
• MM44: A64 - Land between Glaziers Lane and Strawberry Farm, Flexford.

**MM2: Policy S2**

The Borough’s spatial strategy is set out within Policy S2 Planning for the borough – our spatial development strategy and the supporting text. Paragraph 4.1.6 states that the Council will focus growth to the most sustainable locations, determined by a spatial hierarchy, which identifies a ‘brownfield first’ approach. Policy S2 sets out that growth will therefore be directed to:

- Guildford town centre;
- Urban areas;
- Inset villages; and
- Identified Green Belt villages.

This hierarchy reflects the most sustainable options for growth, in line with the NPPF and we support this approach.

However, paragraph 4.1.8 contends that these four preferred locations are unable to accommodate all the new development that is needed and that therefore additional development should then be directed to:

- Countryside beyond the Green Belt;
- Urban extensions to Guildford and Ash and Tongham;
- New settlement at the former Wisley airfield; and
- Development around villages (including some expansion).

Given that Guildford is the Borough’s most sustainable settlement, development should be directed towards urban extensions to Guildford (and Ash and Tongham) ahead of new settlements (ie Wisley airfield) and development around villages (ie Chilworth, Flexford and Send Marsh). The hierarchy at paragraph 4.1.6 encourages this and we again support this approach.

However, the robustness of the spatial strategy continues to be undermined by the Council’s over-riding priority to the protection of the Green Belt over the presumption in favour of sustainable development and the exceptions made to include some large strategic sites low down in the hierarchy based on the infrastructure they could provide.

The LHF site adjoins the Guildford urban area to the north west and therefore sits higher in the settlement hierarchy. The site is well-served by local bus routes with good cycling connections to the town centre. It is also within walking distance of the local facilities in Fairlands. The site is therefore in a sustainable location.

However, despite this, less sustainable sites such as those identified at Ash and Tongham and the new settlement at Wisley, which falls below Liddington Hall in the hierarchy, have been allocated instead. The impact of this approach is that growth will not be focused on the most sustainable locations in conflict with the aspirations of Policy S2.

This position is further exacerbated by the allocation of new sites at Flexford, Chilworth and Send Marsh as well as the increase in units at Garlick’s Arch, which form the Main Modifications to the Proposed Submission Plan and the primary subject of these representations.

We believe the Sustainability Appraisal Addendum (2018) that assesses and attempts to explain the council’s rationale for selecting these additional sites is inconsistent, at times non-sensical, and the council as a consequence have selected a package of sites that do not align best with the purported spatial strategy.
At Paragraphs 5.2.8 to 5.2.12 of the SA (2018), the council’s consultants AECOM set out the parameters for identifying potential additional sources of supply for housing. Firstly, that a sequential approach is followed, in other words that capacity at the most suitable sites higher up the hierarchy should be fully utilised before moving down the next tier in the hierarchy. There needs to be flexibility to deviate from this strict approach if constraints e.g. AONB, heritage; reliance on infrastructure; policy constraints e.g. Green Belt, or delivery indicate otherwise. Secondly that schemes shouldn’t be dependent on the A3 RIS schemes, and finally must be able to contribute meaningfully to the council’s five year supply position. The Inspector has concluded that this is the main purpose of identifying additional sites at this stage in the Plan’s formulation as this is a primary weakness that has been identified.

The SA (2018) goes on at 5.2.11 to say that in terms of robust delivery that the implications are that additional supply must be:

- delivered across a package of sites, as reliance on one site would create a risk that the five year supply might be lost, should that one site not deliver as anticipated;
- geographically spread, again to minimise the risk of unanticipated delays to delivery;
- at locations where delivery is not dependent on prior delivery of new or upgraded infrastructure, the timing of which is outside the Council’s control.

This approach is understood and generally accepted. What isn’t understood or accepted is then the SA’s but ultimately the council’s application of this approach.

Our first contention is the grouping of Green Belt around Guildford with Green Belt around Godalming/Farncombe. Guildford is by far the most sustainable location in the borough and indeed the wider Surrey area. At nearly 80,000 people, it is almost four times the size of Godalming, with the employment, educational, leisure, and retail opportunities to match. Godalming, at circa 17,000 population is not even the largest settlement in Waverley, only being defined as a ‘Community with Key Services’ within the Waverley. It is closer in size to Worplesdon (circa 8,500 population), a Green Belt village and next in the spatial strategy hierarchy than it is to Guildford. For this reason, we believe that Godalming/ Farncombe should be in a lower order tier (perhaps Tier 9), with all options to Urban Extensions to Guildford (Tier 8) exhausted before moving onto Godalming/Farncombe (Tier 8). At present, Land at Aaron’s Hill, Godalming is placed on a ‘even playing field’ in terms of sustainability to LHF and this is not correct.

We believe that given that Guildford is the Borough’s most sustainable settlement, comprising all levels of services, facilities, and employment needs, it is wholly logical that development should be prioritised towards sites with the best access to Guildford and its town centre. Urban extensions to Green Belt villages are in Tier 10, the bottom of the spatial hierarchy and the least preferable therefore should not be identified without exhausting earlier tiers. This continues not to be fully addressed, with the Main Modifications only going to exacerbate this misapplication of the spatial strategy.

A further contention is the assertion at paragraph 5.3.18 that it is not a desirable outcome to have a full allocation of LHF (and indeed Clandon Golf Club) delivering in the middle part of the Plan period. LHF could deliver 600 homes in total. The council now accept that LHF can deliver in the early part of the Plan period (300 homes can be delivered in the first five years and this has been accepted by the council in its examination of a 300-home part of the LHF in the SA (2018). The fact that the site could deliver beyond Year 5 should not preclude the site from further assessment, particular when over 30% of the proposed site allocations are in the lowest two tiers of the spatial hierarchy e.g. Tier 9 ‘new settlements’ and Tier 10 ‘Development around Villages’. LHF would be in Tier 8. Whilst the exam question set by the Inspector is to allocate proposed additional sites that can deliver within Years 1-5, the fact that LHF, a site higher up the spatial strategy can also produce a spatial distribution more aligned to the proposed spatial strategy should be seen as a positive and not a negative that justifies only assesses part of LHF (300 homes) as a reasonable alternative housing option. The council’s approach appears more about retrofitting their proposed additional sites around their submission plan rather than objective assessing the merits of the promoted sites and a real desire to align these with their spatial strategy.

We also contest the ‘given’ scenario that an additional 150 homes could or indeed should be delivered at Send/Garlick’s Arch. Firstly, we question how capacity of the site could have increased by nearly 50% overall and by a further 12.5% in the first 5 years. We have seen no evidence to prove this despite the assertion in para 13 of the Examination Document GBC-LPSS-020. Indeed, provision of an additional 450 homes in five years in a village of circa 1,700 homes, represents a 30% increase. This is unlikely from a build-out perspective, due to the concerns expressed in the SA (2018) relates to
saturation and indeed not desirable from sustainable growth point of view. The council confirm at 5.2.12 of the SA (2018) that it is not ideal concentrating housing at one location, to avoid geographical clusters of sites as it is proportionately more likely to saturate the local market. In fact, Box 5.2 of the SA (2018) states that no more than one site should be identified per village. The Green Belt village of Send has two sites, totalling 550 houses.

Furthermore, as set out in then paragraph above, provision of additional homes (100 in this case) in the middle part of the draft Plan was considered sufficient to warrant non-consideration of other housing options as reasonable alternatives. This should be particular true if it is in the lowest order spatial tier and when other higher tier options exist such as LHF.

The flawed conclusions are ultimately confirmed in the council’s overall selection of proposed additional housing sites at Paragraph 7.2.1 of the SA (2018) and MM2. The council’s preferred approach is Option 3, which involves Aaron’s Hill, Godalming (200 homes), Land at Alderton’s Farm, Send Marsh Road, Send Marsh (120 homes), Land east of Glaziers Lane, Flexford (105 homes) and Land at Hornhatch Farm, New Road, Chilworth (80 homes), leading to a total of 555 additional homes being delivered in the first five years of the plan. In addition, an additional 150 homes is supported at the Garlick’s Arch submission allocation (50 in the first five years) to ensure that best use is made of this site.

We will come on to the criticisms of the specific sites but this approach scored only 4th highest out of the assessed 7 scenarios. The scoring was not really even close with the council’s preferred approach scoring almost 20% worse than the top score. Every scenario that included the identification of ‘Development around Villages’ scored most poorly. The top three scoring approaches all included Urban Extensions to Guildford, with two or the top three including LHF. None of this is surprising given the spatial strategy proposed is to target development at the most sustainable locations, with these locations being the most sustainable out of the options assessed. The conclusions of the SA (2018) therefore only go to confirm that appropriateness of the council’s spatial strategy but that their application of it is flawed. The SA (2018) at paragraph 7.2.1 concludes that ‘the appraisal does not identify Option 3 as performing notably well in terms of any of the topic headings, but equally it is not identified as performing notably poorly in terms of any topic’. This is particularly damning.

We believe that LHF should form part of the preferred approach and should have been identified as an proposed additional housing site in MM2. As drafted, the proposed MM2 is not robust or effective and therefore the draft Local Plan is unsound.

Attached documents:

Comment: MM27 - LPMM18/5975 Respondent: Guildford College Group (Guildford College Group) 17467233 Agent: Indigo Planning Limited (Aaron Peate)

MM27: Policy ID2 - Supporting the Department for Transport’s “Road Investment Strategy”

Policy ID2 states that Guildford Borough Council is committed to working with Highways England to facilitate major, long-term improvements to the A3 trunk road and M25 motorway in terms of both capacity and safety, as mandated by the Department for Transport’s “Road Investment Strategy”.

The Council has added in a paragraph to this policy to commit to reviewing its transport evidence base in the event that there is a material delay in the anticipated completion and or a reduction in scope of the A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) “Road Investment Strategy” scheme from that assumed in plan-making, or cancellation of the scheme.

It states that such a review would investigate the consequent cumulative impacts of approved developments and Local Plan growth including site allocations on the safe operation and the performance of the Local Road Networks and the Strategic Road Network.
Further, it states that in the case of material delay in the anticipated completion and or a reduction in scope in the A3 Guildford scheme, the review will consider the period up to the revised date of completion of the scheme. The outcome of this review will determine whether development can continue to be completed in accordance with the Local Plan trajectory or will determine whether there needs to be a review of the Local Plan.

Whilst the inclusion of such a commitment is welcome and a step in the right direction, it does not go far enough in committing the Council to reviewing its Local Plan at the earliest opportunity should delays be incurred in completing the A3 Road Investment Schemes or if they are reduced in scope.

The SNR2 A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) ‘Road Investment Strategy’ scheme is reported in the Local Plan to be completed between 2024 and 2027.

However, despite SRN2 being a scheme that the Council considers to be necessary to enable the three main strategic allocations to be delivered, it is only a scheme that Highways England (HE) is exploring. HE has not yet come up with a design or a conclusion on whether there is the business case for it to be delivered. There is also no funding in place for the scheme.

Given this uncertainty, a review mechanism must be built into the Local Plan which commits the Council to review its Local Plan should HE report that SRN2 has been scaled back or cancelled.

In light of the impact that such changes would have on the deliverability of the three main strategic allocations (and others in close proximity to the A3), the Local Plan should commit to undertaking a review at the earlier of either:

- HE reporting changes to / or a cancellation of the SRN2; or
- Within three years of the Local Plan being adopted.

We consider that the above is required in order to assess whether additional allocations should be identified in light of any changes to SRN2.

**Attached documents:**

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**Comment: MM39 - LPMM18/5977**  **Respondent: Guildford College Group (Guildford College Group) 17467233**  **Agent: Indigo Planning Limited (Aaron Peate)**

**MM39: A61 – Land at Aaron’s Hill, Godalming**

MM39 introduces new Policy A61 relating to land at Aaron’s Hill, Godalming. The policy proposes to allocate the site for approximately 200 homes.

As discussed above, we believe this site suffers from combined site deliverability issues, given 462 houses are now proposed on the edge of Godalming. This poses serious deliverability due to the size of the overall allocation combined with the Waverley allocation. Furthermore, the site sits adjacent to an Area of Great Landscape Value (AGLV), with limited defensible boundaries. The site also comprises and sits near to two Grade II listed buildings.

LHF does not have these landscape or heritage sensitivities and has the distinct advantage of being closest to Guildford.

Proposed additional housing site A61 should not be included within the Main Modifications to the Plan, particularly at the expense of LHF.

**Attached documents:**
Comment: MM43 - LPMM18/5978  Respondent: Guildford College Group (Guildford College Group) 17467233  
Agent: Indigo Planning Limited (Aaron Peate)

MM42: A62 - Land at Hornhatch Farm, adjoining New Road, Chilworth

MM42 introduces new Policy A62 relating to land at Hornhatch Farm, adjoining New Road, Chilworth. The policy proposes to allocate the site for approximately 80 homes.

As well as its location in the lowest spatial tier, demonstrating its poor sustainability credentials generally, the Chilworth site is within an AGLV and in close proximity to AONB.

LHF does not have these landscape sensitivities and has the distinct advantage of being closest to Guildford. Every option assessing LHF scores more positively than any option involving Chilworth (A62).

Proposed additional housing site A62 should not be included within the Main Modifications to the Plan, particularly at the expense of LHF.

Attached documents:

Comment: MM43 - LPMM18/5979  Respondent: Guildford College Group (Guildford College Group) 17467233  
Agent: Indigo Planning Limited (Aaron Peate)

MM43: A63 - Land west of Alderton’s Farm, Send Marsh Road, Send

MM43 introduces new Policy A63 relating to land west of Alderton’s Farm, Send Marsh Road, Send. The policy proposes to allocate the site for approximately 120 homes (C3), including some self-build and custom house building plots.

As well as its location in the lowest spatial tier, demonstrating its poor sustainability credentials generally, the site utilises grade 2 agricultural land (best and most versatile). Perhaps more importantly, the provision of an additional 450 homes in five years in a village of circa 1,700 homes, represents a 30% increase. This is unlikely from a build-out perspective, due to the concerns expressed in the SA (2018) relates to saturation and indeed not desirable from sustainable growth point of view. The council confirm at 5.2.12 of the SA (2018) that it is not ideal concentrating housing at one location, to avoid geographical clusters of sites as it is proportionately more likely to saturate the local market. In fact, Box 5.2 of the SA (2018) states that no more than one site should be identified per village. The Green Belt village of Send has two sites, totalling 550 houses.

LHF does not have these agricultural land or deliverability issues and has the distinct advantage of being closest to Guildford. Every option assessing LHF scores more positively than any option involving Alderton’s Farm (A63).

Proposed additional housing site A63 should not be included within the Main Modifications to the Plan, particularly at the expense of LHF.

Attached documents:

Comment: MM45 - LPMM18/5981  Respondent: Guildford College Group (Guildford College Group) 17467233  
Agent: Indigo Planning Limited (Aaron Peate)
MM44: A64 - Land between Glaziers Lane and Strawberry Farm, Flexford

The policy proposes to allocate the site for approximately for approximately 105 homes (C3), including some self-build and custom house building plots.

The proposed site is detached from the main Flexford settlement, being on the other side of the railway line, an important and permanent defensible boundary which defines the village of Flexford.

LHF does not have these landscape issues and has the distinct advantage of being closest to Guildford. Every option assessing LHF scores more positively than any option involving Flexford (A64).

Proposed additional housing site A64 should not be included within the Main Modifications to the Plan, particularly at the expense of LHF.

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

- The site is in a sustainable location on the edge of Guildford and within easy reach of the Fairlands Estate;
- It is well-served by local bus routes with good cycling connections to the town centre. It is within walking distance of the local facilities in Fairlands;
- The level of additional traffic generated from LHF and affecting the A3 would be very low and the level of traffic impacting the key links during the peak periods would be minimal. A scheme for only half the site i.e. 300 homes would have an even more limited impact;
- From this, it can be concluded that no further work would be required to the junctions and there would not be a severe impact with the addition of LHF over and above the developments already assumed to be delivered in the early part of the plan period. A scheme for only half the site i.e. 300 homes would have an even more limited impact;
- The above does not take into account modal shift that could be enabled as a result of improvements to bus / pedestrian / cycle network in and around LHF. It does also not take into account other factors such as peak spreading / changing working from home patterns, etc. Clearly, these would reduce the impact on the A3 during the critical peak periods even further;
- The site is well connected at present and the development of the site has the potential to enhance the pedestrian, cycle, and public transport network significantly for the wider population. To do so, would require relatively limited improvements compared to other sites. LHF is well placed to assist and benefit from the Sustainable Movement Corridor (SMC) given that SMC1 appears to be the only element of the whole corridor that has secured Local Growth Funding, undergone public consultation and has advanced designs. The delivery of c.300 units allows scope to secure additional financial contributions towards the local walking and cycling routes around and across the site that exist at present to link up with the SMC. In terms of public transport, LHF is already well connected with 6 bus services running adjacent to the site including three high frequency routes (KITE and 26/27). There may be opportunities to divert services into the site, promote new services and/or improve frequencies of existing services;
- GBC are in advanced discussions with Berkeley Homes and that this would aid the delivery of the site, particularly in the short term. It is our view and Berkeley Homes’ that the LHF site could delivery up to 300 homes within the next five years. The site is in single ownership, is not incumbered by any significant transport constraints/infrastructure needs, and discussions are advanced with various housebuilders. There is no impediment to early delivery;
- We are also confident that the site can be master planned to avoid any significant impact on the openness of the Green Belt. Although we disagree with the conclusions and scoring of the LHF site in the Council’s Green Belt Study anyway, if a smaller portion of the LHF site were reassessed, we are confident that the site would not be scored as ‘highly sensitive’ Green Belt
  - The existing footpaths already connect the site back in to adjoining residential areas;
  - The site is effectively surrounded on three sides by existing development and two streets of existing development extend into the site from Aldershot Road;
• The substantial tree belts and small copses on the western and southern boundary, together with the settlement edges and road corridors on the northern and eastern boundaries establish a sense of containment to the site;
• The site has clear defensible boundaries and an appropriate Masterplan for the site could provide a robust green edge;
  • The site has a very limited role in preventing the merging of Guildford and Fairlands;
• The site has only a limited role in containing the sprawl of urban areas;
• The site plays no role in preserving the setting and special character of an historic town;
• The site is not subject to any landscape-related, ecological, archaeological or heritage designations;
• None of the land is high grade agricultural land (predominantly grade 3 with some grade 4);
• The site is not a flood zone;
• Residential development of the site would be compatible with adjacent residential land uses; and
• Appropriate access into the site can be achieved.

Soundness of the Proposed Submission Local Plan with Main Modifications

As with the previous versions of the draft Local Plan, we maintain that the Proposed Submission Local Plan with Main Modifications is unsound because:

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

I trust that the above is clear but please let me or my colleague, Ben Frodsham, know if you have any questions.

Attached documents:

Comment: MM9 - LPMM18/5976  Respondent: Guildford College Group (Guildford College Group) 17467233
Agent: Indigo Planning Limited (Aaron Peate)

MM9: Policy P2: Green Belt

We believe that the proposed modification to Policy P2 does not go far enough and request an amendment to the supporting text to draft Policy P2 to remove the Merrist Wood Campus from the Green Belt.

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

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

We request an amendment to the supporting text to draft Policy P2 as follows:
Para 4.3.15 The following major previously developed sites are now inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute, the University of Law Guildford and Merrist Wood College.

Comment: MM2 - LPMM18/4892  Respondent: Morten Frisch 17472865  Agent:

I object to the proposed amendments to the Guildford Borough Local Plan for the reasons stated below:

1. NUMBER OF HOUSES (MM2)

I object to the planned 12,600 new houses. The recent ONS household forecast has reduced by 6,635 (40%) since the previous forecast, and this needs to be reflected in the Plan. This reduction in households is roughly equivalent to two strategic sites plus all five of the new sites that were included after the Local Plan Examination in Public, and cannot be ignored. The Plan should be updated and resubmitted to the Planning Inspector.

Attached documents:

Comment: MM3 - LPMM18/4893  Respondent: Morten Frisch 17472865  Agent:

2. NEW POLICY S3 ON THE TOWN CENTRE (MM3)

The new Town Centre Policy does not include details of what is planned for the town, whereabouts it is planned, or when it is proposed that it should happen. At the Examination in Public the Council stated that the need to demonstrate a 5-year housing supply had led them to allocate rapidly developable sites that were at the least sustainable, and were at the bottom of the hierarchy. The Town Centre Policy should be revised to take advantage of the sustainable opportunities in the town centre, and to reduce the development of sites in the Green Belt.

Attached documents:

Comment: MM40 - LPMM18/4895  Respondent: Morten Frisch 17472865  Agent:

4. POLICY A35: FORMER WISLEY AIRFIELD (MM40)

The inclusion of Wisley airfield as a development site in the Local Plan ignores the recent dismissal of planning appeal on that site by Secretary of State. The traffic impacts of the proposed development would be the same as those just rejected by the Secretary of State, and are therefore unacceptable, as are the impacts on the local infrastructure (parking, medical provision, schooling etc), particularly when ONS household projections, on which the Local Plan should be based, have been reduced by 40%.

The Site of Nature Conservation Importance (SNCI) which used to cover the entire airfield site has been reduced to about 15-20% of its former size, and about one third of that residual area is land that is “safeguarded” for waste operations. This is inconsistent with paragraph 10(a) of the Policy A35 which states that “Every effort must be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.”

Attached documents:
I object to the inclusion of the site

Attached documents:

Comment: MM9 - LPMM18/4894  Respondent: Morten Frisch 17472865  Agent:

3.POLICY P2: GREEN BELT (MM9)

Given the greatly reduced housing projections from ONS, and the fact that 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt, then by definition the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist. I strongly object to development in Green Belt under these circumstances.

Attached documents:

Comment: MM2 - LPMM18/2747  Respondent: Derek Gillmore 17490561  Agent:

I would like you to note my following comments as a resident of West Clandon for 14 years.

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited

3. There is too much reliance on A3 improvements and these are beyond the council’s control

4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit

5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’. Just wishing

1. I would like the Inspector to RE-EXAMINE the Local Plan because:

2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.
The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

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The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

Attached documents:

Comment: MM2 - LPMM18/2748  Respondent: Derek Gillmore 17490561  Agent:

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

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MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2751 Respondent: Derek Gillmore 17490561 Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

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MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

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MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

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Attached documents:

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Attached documents:

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MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/2752  Respondent: Derek Gillmore 17490561  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2753  Respondent: Derek Gillmore 17490561  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2754  Respondent: Derek Gillmore 17490561  Agent:
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2755  
Respondent: Derek Gillmore 17490561  
Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2756  
Respondent: Derek Gillmore 17490561  
Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2757  
Respondent: Derek Gillmore 17490561  
Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2750  
Respondent: Derek Gillmore 17490561  
Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
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   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

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   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by that organisation in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

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**Attached documents:**

**Comment:** MM2 - LPMM18/3831  **Respondent:** Moira Maidment 17491425  **Agent:**

Please find my name here in support of the comments, suggestions and objections made to you in respect of your Local Plan for development, by the Residents of West Clandon where I live and own my property.

Just a reminder that you now have **less than 24 hours** to respond to Guildford Council's modified Local Plan which will result in massive building on Green Belt around West and East Clandon, including a major industrial estate, and the consequent impact on our villages with dangerous, unsustainably increased traffic.

**THE DEADLINE IS NOON TOMORROW TUESDAY 23 OCTOBER.**

A great deal of work has gone into researching and writing the response we have created for you to use - **PLEASE USE IT and do not waste this opportunity to get the Plan pulled back in for re-examination.**

As before we have made it as easy as possible for you by creating a full response (below our sign off in this email) - all you have to do is:

1. Copy and paste the text below our sign off into a new email
2. Add your name and address at the top of this text where shown and your name at the bottom (this is important as the Council will not count anonymous responses)
3. Send it to localplan@guildford.gov.uk with the words 'Response to Modified Guildford Local Plan' in the subject line

**ALTERNATIVELY WE HAVE ATTACHED A WORD DOCUMENT WITH THE RESPONSE SO THAT YOU CAN ADD YOUR NAME AND ADDRESS AT THE TOP, AND NAME AT THE END, TO SEND AS AN ATTACHMENT IF PREFERRED.**

**BUT PLEASE, WHATEVER YOU DO, SEND A RESPONSE TO GUILDFORD COUNCIL NOW - the more that are sent the more likely we are to achieve a re-examination.**

Thank you!
RESPONSE TO MODIFIED GUILDFORD LOCAL PLAN

(Your name and address)

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

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**Comment:** MM31 - LPMM18/3835  **Respondent:** Moira Maidment 17491425  **Agent:**
MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

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**Attached documents:**

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**Comment:** MM32  -  LPMM18/3836  **Respondent:** Moira Maidment 17491425  **Agent:**

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Ref: Guildford Borough Council’s Modified Local Plan consultation

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2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
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6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**
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1. The junction with the current A3 south-bound slip road (modifications are underway)
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3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
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10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expectGuildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.
Attached documents:

**Comment: MM23 - LPMM18/5444  Respondent: Margaret Perkins 17491489  Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect *locally distinct* patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address *character* adequately.

MM23 Promotion of “*green approaches*” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the *Wey Corridor* then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A *height limit* should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

**Comment: MM3 - LPMM18/5436  Respondent: Margaret Perkins 17491489  Agent:**

MM3 In (5) new town centre development should avoid adverse *impact on surrounding residential* areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to *prevent inappropriate garden grabbing* and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

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MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

**Comment: MM31 - LPMM18/5445**  **Respondent: Margaret Perkins 17491489**  **Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

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MM31 There appears to be no allocation for an **all-direction bus interchange**.

Attached documents:

**Comment: MM32 - LPMM18/5446**  **Respondent: Margaret Perkins 17491489**  **Agent:**

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**Comment: MM33 - LPMM18/5448**  **Respondent: Margaret Perkins 17491489**  **Agent:**

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Attached documents:

Comment: MM44 - LPMM18/5450  Respondent: Margaret Perkins 17491489  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/5437  Respondent: Margaret Perkins 17491489  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/1809  Respondent: Samantha Gilchrist 17495393  Agent:

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**Comment: MM48 - LPMM18/1810  Respondent: Samantha Gilchrist 17495393  Agent:**

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Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

Attached documents:

**Comment:** MM9 - LPMM18/1813  **Respondent:** Samantha Gilchrist 17495393  **Agent:**

MM9 In Green Belt, proposed limited *infilling outside identified settlement* boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

**Comment:** MM2 - LPMM18/2794  **Respondent:** B Lockie 17604577  **Agent:**

- There seems to be no sound reason why Guildford should be taking up the shortfall for Woking Borough Council’s ‘unmet housing need’, especially as Woking wants to protect it’s Green Belt land and so is not proposing to build on its Green Belt but Guildford is proposing to do this and do it on a large scale, with an increase because of taking up Woking’s ‘unmet housing need’.
- The very recently released Office for National Statistics (ONS) figures show that Guildford does not need so many new houses (a fall of 40-45% from its previous figures). Neighbouring councils also show a reduction in need of approximately 36% for Woking and 27% for Waverley. These figures need to be accurately reflected in the proposed GBC local plan as the figures previously proposed are unsound.
- The Government said that councils could not build on Green Belt land unless there were exceptional circumstance: there are no exceptional circumstances for GBC to propose building on Green Belt land, especially as brown field sites are available. Greenfield sites rely on cars, brown field sites largely negate the need for cars.

Attached documents:

**Comment:** MM27 - LPMM18/2790  **Respondent:** B Lockie 17604577  **Agent:**

MM27, MM41, MM42, MM48 Transport Strategy

- Not only are there implication for Send from the proposed developments at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s but there are also knock-on effects with the proposals for Gosden Farm: the proposed Wisley/Ockham A3 and Clandon slip roads changes have not been properly assessed with thousands more vehicles crowding the areas and impacting on Send roads as well as traffic heading to Woking. Noise will increase along with pollution, delays and gridlock.

Attached documents:
MM41 Land at Garlick’s Arch, Send Marsh, Policy A43

- 7000 objections to the previous number of houses has been ignored
- This is in Green Belt that contains ancient woodland.
- The proposed increase of 37% is far too much, within an area that is frequently congested, further adding to the already overloaded infrastructure.
- Send, Burnt Common and Ripley are distinct areas and this will join up these areas making the villages’ area more like an urban sprawl
- This site can be frequently flooded with a culvert that takes water from the Surrey Hills in wet weather. With building on this site, particularly in such high numbers, where is the water to go? Flood prevention works undertaken 10 years ago to protect houses in Send Marsh are falling apart and disintegrating anyway but regardless of this, surely with such a high density of housing proposed, there would again be a risk to flooding to land and has already landed in our garden on occasions, new houses on this site would be even more at risk and how much lead shot in on the land?
- The Portsmouth Road and Send Road are the only main roads in the areas and these are often congested. Our other ‘roads’ are one track lanes. Building so many houses would mean at least 800-1000 more cars to block local roads. Even ideas of building another junction to the A3 would not alleviate traffic on local roads, and even more so when the A3 is gridlocked (which has happened several times in the past few weeks.)
- Already the schools and doctors are overcrowded with no spaces for more patients/children plus the parking for these is difficult at the moment and would be impossible for in excessive of another 2000 people (based on 4 people per household).
- Public transport is not great and does not run after 7.30pm in the evening so people need cars.

Attached documents:

Comment: MM41 - LPMM18/2791 Respondent: B Lockie 17604577 Agent:

MM27, MM41, MM42, MM48 Transport Strategy

- Not only are there implication for Send from the proposed developments at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s but there are also knock-on effects with the proposals for Gosden Farm: the proposed Wisley/Ockham A3 and Clandon slip roads changes have not been properly assessed with thousands more vehicles crowding the areas and impacting on Send roads as well as traffic heading to Woking. Noise will increase along with pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/2787 Respondent: B Lockie 17604577 Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

- This proposal was deleted from the 2014 plan. Not only is it reinstated but has now increased from 7000 sq m to 14,800 sq m.
- The speed and frequency of traffic coming off the A3 would make this very dangerous
- With the congestion on local road a problem anyway, along with any extra housing, this would further magnify the problem
- No other village in the borough has been allocated such a vast increase in industrial sites
• There is no conceivable need to put this proposed industrial site on Greenbelt land when Slyfied has unused room to increase its capacity and the better road structure to accommodate it.
• There seem to be no special circumstances to contradict MM9
• The ELNA showed a reduction in demand for industrial land not more need
• Send Business Centre is proposing a 25% increase: this plus the proposed industrial unit at Burnt Common would make a concentration in Send that is much higher than other villages with no proof that the demand for this is needed.
• The Portsmouth Road, Send Road and the very short distance of London Road are the only main roads in the area and these are often congested. Our other ‘roads’ are largely one track lanes. The use of this site for industrial use would mean blocking local roads. Even ideas of building another junction to the A3 would not alleviate traffic on local roads, particularly when the A3 is gridlocked (which has happened several times in the past few weeks.)
• Pollution from this extra heavy goods lorries would further increase the already high nitrogen dioxide levels.

Attached documents:

Comment: MM42 - LPMM18/2792  Respondent: B Lockie 17604577  Agent:

MM27, MM41, MM42, MM48 Transport Strategy

• Not only are there implication for Send from the proposed developments at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s but there are also knock-on effects with the proposals for Gosden Farm: the proposed Wisley/Ockham A3 and Clandon slip roads changes have not been properly assessed with thousands more vehicles crowding the areas and impacting on Send roads as well as traffic heading to Woking. Noise will increase along with pollution, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/2788  Respondent: B Lockie 17604577  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

• This was previously deleted from a previous draft local plan because of many objections and was not included in the recent local plan until the public examination in July.
• This is Green Belt land with no special circumstances so contradicts MM9
• Send Marsh Road is is more like a country lane with a single track bridge and has a 90 degree bend in it. Many accidents have occurred at the bend with one house at the bend frequently having vehicles knocking down its walls. Already ‘maniacs’ travel along there with no heed to local road conditions. Large lorries come down there several times a day as their sat navs send them that way. With even more houses on this road, where there is also an old people’s home that would be adjacent to the proposed houses, this road is becoming increasingly dangerous year on year.
• The village nature of Send Marsh Green and its heritage buildings will be compromised if this planned housing goes ahead
• Traffic at Send crossroads is already busy and this would further increase traffic in the area as well as have a knock-on effect for Old Woking.
• Already traffic also backs up along Send Marsh Road at the junction with Portsmouth Road and the problem would be further exacerbated at this other end of the Send Marsh Road as well as at the crossroads.
• All the problems with this cannot be taken in isolation: the proposals for Garlick’s Arch, Clockbarn, Winds Ridge and the proposed industrial site at Burnt Common must also be taken into account. Send would increase by nearly 50% which is far too much for our infrastructure as well as completely changing the nature and make-up of Send and the surrounding area.

Attached documents:

Comment: MM48 - LPMM18/2793  Respondent: B Lockie 17604577  Agent:

MM27, MM41, MM42, MM48 Transport Strategy

• Not only are there implication for Send from the proposed developments at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s but there are also knock-on effects with the proposals for Gosden Farm: the proposed Wisley/Ockham A3 and Clandon slip roads changes have not been properly assessed with thousands more vehicles crowding the areas and impacting on Send roads as well as traffic heading to Woking. Noise will increase along with pollution, delays and gridlock.

Attached documents:

Comment: MM9 - LPMM18/2789  Respondent: B Lockie 17604577  Agent:

MM9 Green Belt Policy

• What is GBC doing under this policy. This test is subjective, has considerable uncertainty and negates Green Belt protection. Land surrounding our village could be used for development and developers would speculate, not having any regard for people living in Send (Look at Cayman Island speculators have fought for development at Wisley)

Attached documents:

Comment: MM13 - LPMM18/5552  Respondent: Talullah Scotland 17633313  Agent:

• MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

Comment: MM2 - LPMM18/5550  Respondent: Talullah Scotland 17633313  Agent:
I have not been advised of this consultation (despite being advised previously by email) and only heard of it by my neighbours. Why have you stopped informing me?

I fully support the representation made by Wisley Action Group and their legal team. In particular, their observations that:

• MM2 The housing target is wrong.

• MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.

• The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/5555  Respondent: Talullah Scotland 17633313  Agent:

• MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes) – (this makes it easier for developers)

• Strategic sites are to be exempt from design constraints (which will result in developments such as that proposed on Three Farm Meadows)

• There is no evidence that recent case law such as “People over Wind” has been taken into account

Attached documents:

Comment: MM3 - LPMM18/5556  Respondent: Talullah Scotland 17633313  Agent:

• S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/5557  Respondent: Talullah Scotland 17633313  Agent:

SITE SPECIFIC – A35 – Three Farms Meadows

• The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR

• Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
• MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.

• The biodiversity of the SNCI will be destroyed by the proposed development.

• An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Attached documents:

Comment: MM41 - LPMM18/5554  
Respondent: Talullah Scotland 17633313  
Agent:

• MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].

• There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Attached documents:

Comment: MM9 - LPMM18/5551  
Respondent: Talullah Scotland 17633313  
Agent:

• MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM2 - LPMM18/2406  
Respondent: Gladman Developments Ltd (Richard Agnew) 17752321  
Agent:

MM2: Policy S2: Planning for the borough - our spatial development strategy

It remains Gladman’s position that the Council should be following the Sedgefield approach for calculating a rolling five-year housing land supply rather than the Liverpool approach. The significant backlog that has accrued since the start of the plan period should be dealt with within the first five years of the plan. We recognise that this backlog is significant however there is a clear need for these homes now and not later in the plan period.

Attached documents:

Comment: MM6 - LPMM18/2407  
Respondent: Gladman Developments Ltd (Richard Agnew) 17752321  
Agent:

MM6: Policy H2: Affordable homes
Gladman are concerned that the policy is still seeking for ‘at least’ 40% of homes as affordable. The NPPF establishes in paragraph 17 and 154 the importance of the local plan setting out unambiguous policies that support predictable and efficient decision making. It is therefore essential that affordable housing requirements are set out as maximums not minimums as this provides the clearest indication as to how a decision maker should react with regard to this policy. It also ensures that applicants are confident that they will not be asked for a higher level of affordable housing requirement by the Council.

When considering this policy, it is also important to recognise that it will be implemented on the basis of paragraph 57 of the revised NPPF. This states that where an application complies with the development plan then it should be assumed to be viable. No further assessment of viability is required, and no additional provision of affordable housing should be sought by the Council. To provide the necessary clarity on this the Council should set out its requirement as 40% to ensure certainty for applicants as well as deliver consistent decision making in future that is compliant with the revised NPPF.

Attached documents:

Comment: MM2 - LPMM18/6039  Respondent: Thakeham Homes (Sir or Madam) 17976417  Agent: RPS
Planning & Development (Mr Cameron Austin-Fell BA)

Guildford Local Plan: Consultation of Main Modifications

These representations have been made by RPS on behalf of Thakeham Homes, who have land interests to the west of Fairlands.

RPS has been involved in the Examination sessions for the Local Plan, where substantive concerns were raised surrounding the soundness of the Council’s strategy for new growth and the ability of the Council to deliver the necessary housing within the Plan period. RPS does not consider that the Council’s proposed Main Modifications (MMs) address these concerns, and the Council will not be able to maintain a deliverable supply of housing land post adoption of the plan.

RPS remain of the view that the MMs are not appropriate, or justified, and further work is necessary to ensure that these concerns can be addressed. In addition, RPS has identified further discrepancies in the Council’s Sustainability Appraisal, which has reoccurrenty failed to address Thakeham’s land interests to the west of Fairlands as a reasonable alternative site. As such, the findings of the Sustainability Appraisal do not legitimise the Council’s findings and further work is necessary in order to ensure that the most appropriate sites are brought forward as part of the Plan.

Sustainability Appraisal

In support of the MMs, the Council has prepared a Sustainability Appraisal Addendum [GBC-LPSS-028a], dated September 2018. This document sets out the Council’s selection of reasonable alternative sites and provides justification for the Council’s preferred approach.

As part of this approach, the Sustainability Appraisal Addendum (SA Addendum) presents seven options for additional housing scenarios, summarised in Appendix 1. None of these options include the potential for land west of Fairlands, as a legitimate reasonable alternative site. RPS considers that this approach is unjustified.

Upon request from the Council, Thakeham Homes provided an updated masterplan for land west of Fairlands, which demonstrated how a smaller site could come forward, consistent with the need for more non-strategic sites [INS ID/6]. A plan was provided to the Council (Appendix 1), which presents a Phase 1 scheme for 270 dwellings, which would also include a community hub and SANG provision. This plan was available to the Council when considering the site for the purposes of the SA process.

The justifications in the SA for discounting the sites are provided within paragraph 5.4.8 of the SA, which surprisingly identifies that Land to the west of Fairlands could ‘deliver in full within the first five years of the plan’ and ‘does not
stand out as subject to constraint’. The SA however rules out the site as a reasonable alternative on the following grounds set out within paragraph 5.4.8:

‘Firstly, there is a need to consider the reasonableness of scenarios involving land to the west of Fairlands. The site does not stand out as subject to constraint, and Fairlands appears no less suited to growth than other settlements; however, a concern is with the size of the allocation. The resulting scenario would involve additional supply via just two sites, and hence could be associated with a degree of delivery risk. Whilst scenarios 1, 2 and 7 would equally involve reliance on just two large sites, they are preferable as they align closer with the spatial strategy.’

The logic presented here in the SA is flawed and contradictory, particularly given the Council’s decision to include 200 homes at Aaron’s Hill, Farncombe in the plan although delivery of this site, as demonstrated above is uncertain. Given that Garlick’s Arch (see comments on MM41) does not deliver the Inspectors requirement for early delivery, the site at the west of Fairlands has the potential to be delivered alongside 2 or 3 of the tier 10 sites and therefore ruling the site on its restriction to be delivered only with 1 other site is unfounded. The SA should clearly not have discounted Land to the West of Fairlands on the basis of site size. The SA does also indicate that this could be reduced further (paragraph 5.4.6), yet no justifications have been given as to why this has not been considered as an option.

Indeed, the SA also recognises that Land West of Fairlands would present the most sequentially preferable site in Fairlands (Box 52 refers), and can come forward in a way which presents strong defensible boundaries.

An earlier version of this SA Report Addendum (namely the draft version submitted to members in August 2018) included an analysis including an appendix dedicated to ‘Supplementary information on site options’. (Appendix 1). The decision was subsequently taken however to delete that appendix referenced on site options (footnote 11, p10) as ‘the information presented was simply a repeat of the information presented in Appendix IV of the SA Report Update and, on reflection, was deemed unnecessary and with the potential to cause confusion.’ It is unclear why the decision was taken to remove this table, however turning to it, it appears that some consideration has been given to Land West of Fairlands. For the benefit of the Examination, this has been enclosed as Appendix 2 of these representations, to ensure transparency in the process.

If the table in Appendix 1 had not been omitted however it would have demonstrated that several of the chosen sites were in unsustainable or less sustainable locations than the site at Fairlands represented herein. All of the chosen sites are outside of a 2km walking distance from the facilities of a district or local centre, all besides Aaron Hill are further than 2km walking distance from a primary school and all are more than 1km walking distance from a health centre (more than 2km for Aaron’s Hill and Glazier’s Lane). RPS advises that the findings of this SA Appendix are taken into account when considering the options for reasonable alternative sites.

The site at Fairlands however lies within 0.2 miles/0.3km (4 minutes walk of Fairlands Practice/Rowlands Pharmacy, 0.3 miles/0.5km (6 minutes walk) of Worplesdon Primary School, and 0.3 miles/0.5km (6 minutes walk) of Fairlands Local centre including 2 convenience stores, hair and beauty and other retail establishments. Furthermore the site lies within 3 miles/4.8km of Guildford town centre, easily accessible within 20 minutes by a regular bus service and also within 9 minutes via a single A road (A323). The site is not reliant on the uncertain delivery of improvements to the A3 and the site will furthermore reduce the traffic within Guildford town centre through a new park and ride scheme. The site will also provide a SANG in excess of its own requirement. Although the omitted analysis made an assessment based on both the Fairlands sites, the draft SA found that these presented more favourable scores than the preferred options. The scores for Land to the West of Fairlands may have even scored more preferably if assessed on its own merits. The site is therefore not just more sustainable than the Council’s chosen options but it will also enhance the district centre’s and district’s ecological, transport and air quality sustainability.

The Council have however chosen sites subject to additional delivery constraints, further from Guildford and other local services, and reliant on improvements to the A3, of which delivery is uncertain (Policy ID2). Aaron’s hill is in close proximity to Godalming but as suggested within the SA Godalming is ‘on a significantly smaller scale compared to Guildford Town Centre.’ (p59) Also this approach does not ‘maintain Guildford borough and Guildford Town’s economic role’ or enhance the district’s local economy.

Fairlands however lies less than a mile from the edge of Guildford and acts as a suburb to the town. Development here will provide improved access to the town centre via a new park and ride and increase the population utilising the town
centre economy, facilitating its growth in accordance with the retail, employment and spatial strategies of the plan. This demonstrates that the Council have unjustifiably chosen unsustainable and undeliverable sites and omitted the evidence base behind this. The Council’s reasoning for omitting the site is therefore contradictory and justified on delivery grounds where they have previously said there were no concerns. This would determine that the SA is not soundly based and has been unobjectively skewed towards the Council’s preferred options from the outset.

The advice provided regarding the sustainability appraisal of the emerging Huntingdonshire Local has been a consideration of these representations which recognise that a SA is a planning judgement of the Local Authority. The Council are however required to consider all ‘reasonable alternatives.’ Paragraph 40 of the Hickinbottom case (R (RLT Built Environment Ltd) v Cornwall Council (2016) EWHC 2817)) set out the key principles as to what is required for something to be a reasonable alternative. This determines that ‘an option which will, or sensibly may, achieve the objectives is a reasonable alternative.’ Whether this is achieved is a matter of evaluative judgement on behalf of the authority and if the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative’.

The Council’s reasoning evidence for the site however only demonstrates that the site does meet the objectives consideration as a reasonable alternative and on this basis, it is perverse that the site has been excluded from assessment. This, alongside the Council’s decision to omit supportive information, suggests that the report presents some uncomfortable truths, and has been unobjectively prepared.

In summary the Council’s judgement to discount this site from assessment is not appropriate or justified and has omitted a clear reasonable alternative site from the selection of further sites. RPS, considers that this is not a good practice, and consequently will prevent delivery of the Borough’s immediate housing need due to the inclusion of undeliverable sites early in the plan period. Omission sites should therefore be considered outside of the SA on their merits, considering their sustainability, benefits, deliverability and their ability to contribute development early in the plan period. RPS would recommend that the SA is revised, to take a fair and transparent view of Land to the West of Fairlands as a reasonable alternative in light of existing options to consider whether the Council are planning for the right strategy, or simply retrofitting based on initial decisions made.

Led by Thakeham Homes, RPS considers that Land to the West of Fairlands represents a sustainable option for growth that can see delivery in the next five years, consistent with the Inspector’s Note ID6. The Council has proposed to meet this through a number of new sites, which RPS provide comment on below.

**Attached documents:**

**Comment:** MM39 - LPMM18/5834 **Respondent:** Thakeham Homes (Sir or Madam) 17976417 **Agent:** RPS Planning & Development (Mr Cameron Austin-Fell BA)

**Main Modification 39 (MM39) – Site A61**

The Modifications suggest that the greatest contribution to early housing delivery will be made via a constrained site with an uncertain delivery. The Sustainability Appraisal determines Aaron’s Hill as the most appropriate larger site due to its location in relation to Godalming and its relationship to the emerging proposed allocation in the Waverley Local Plan Part 2.

The Waverley Local Plan is not however far advanced, currently at preferred options stage. It cannot therefore be given weight in determining the suitability of the site. The relevant proposed allocation has also been submitted as a planning application, but this is not decided and is currently the subject of several environmental concerns and consultation objections. Adoption of the Waverley Local Plan is not anticipated until late 2019, and prior to approval of the above-mentioned site (if this should be achieved) the comprehensive design requirements of a cross boundary site under separate applications and the delivery of infrastructure across multiple Council’s should only hinder the delivery of the
site. The delivery of a site of this scale within the first 5 years of the plan with these delivery constraints is therefore unlikely and its inclusion would make the plan unsound.

**Attached documents:**

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**Comment:** MM41 - LPMM18/5835  **Respondent:** Thakeham Homes (Sir or Madam) 17976417  **Agent:** RPS Planning & Development (Mr Cameron Austin-Fell BA)

**MM41 – Site A43 Garlicks Arch**

Given that the purpose of finding additional allocations is to provide more certainty of delivery in the early years of the plan, increased delivery at Garlick’s Arch should not be taken as a given without proper justification. Additional housing on a large existing site does not meet the purpose of this exercise and therefore any additional development at Garlick’s Arch should be additional to the 550 additional dwelling allocations requested by the Inspector.

Secondly, in proposing this additional housing in addition to site A63 (Land West of Alderton’s Farm, Send Marsh Road, Send) the Council are effectively proposing that they will deliver 570 homes (100 homes at Garlick’s Arch at year 6) across 2 sites within a single village in the first 5 years of the plan. This appears unrealistic whilst avoiding market saturation and fails to consider the capacity of existing community infrastructure to which the Sustainability Appraisal states that ‘higher growth at Send/Marsh may be considered problematic on the basis that this area is already set to receive a considerable amount of housing’ but concludes this with ‘however it is again difficult to assign any particular weight to this consideration.’ (page 60)

Furthermore, both sites (A43 and A63) are at least partially dependant on the development of the A3 of which delivery timescales are uncertain. The new slip roads to the A3 at Burnt Common are immediately adjacent to site A43 and yet page 72 of the Sustainability Appraisal considers only the larger sites at Clandon Golf, Liddington Hall and Aaron’s Hill. Site A43 is a large site relied upon for the early delivery of homes and is reliant on upgrades to the A3. Alone and cumulatively with site A63 the site will have a significant impact on traffic congestion on the A3, which is not duly considered within the Council’s evidence base. The provision of community and transport infrastructure can cause significant delays to development to which the Council have given no weight. The delivery of these sites is therefore uncertain and they cannot be relied upon to accommodate the Council’s shortfall in the early years of the plan. Their inclusion would therefore make the Plan undeliverable and therefore unsound.

In addition, no reference is made to the additional SANG requirement needed to accommodate the additional homes proposed at site A43. In addition to the requirement to protect the Thames Basin Heath Special Protection Area, the development of both this site and site A63 will impact on the Papercourt SSSI which lies within 400m of the sites. Particularly if the SANG capacity above is not provided for these developments could place additional pressure on the most significant habitat that is in close proximity to any of the omission sites. Evidence should therefore be provided to demonstrate that the site is capable of accommodating this additional area of SANG in order that the sites development does not harm the SSSI and to demonstrate accordance with emerging Policy P5 (Thames Basin Heaths Special Protection Area).

**Attached documents:**

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**Comment:** MM43 - LPMM18/5836  **Respondent:** Thakeham Homes (Sir or Madam) 17976417  **Agent:** RPS Planning & Development (Mr Cameron Austin-Fell BA)

**MM43 – Policy A62: land at Hornhatch Farm, adjoining New Road, Chilworth**

In addition, no reference is made to the additional SANG requirement needed to accommodate the additional homes proposed at site A43. In addition to the requirement to protect the Thames Basin Heath Special Protection Area, the development of both this site and site A63 will impact on the Papercourt SSSI which lies within 400m of the sites. Particularly if the SANG capacity above is not provided for these developments could place additional pressure on the most significant habitat that is in close proximity to any of the omission sites. Evidence should therefore be provided to demonstrate that the site is capable of accommodating this additional area of SANG in order that the sites development does not harm the SSSI and to demonstrate accordance with emerging Policy P5 (Thames Basin Heaths Special Protection Area).
This site lies adjacent to the AGLV and in close proximity to the AONB. The landscape sensitivity and necessary mitigation measures are however unassessed. The Landscape Character Assessment provided by the Council considers areas at a broad scale and not individual sites therefore the landscape impact of developing the site close to these designated areas is uncertain.

In addition to this the site lies on high quality agricultural land, which whilst it is recognised that it is a small area, in combination with AONB, AGLV and Green Belt impacts suggests a limited regard by the Council towards environmental impacts. The Council have also followed this approach at Aaron’s Hill (See MM39) which also lies adjacent to an AGLV.

Conversely the site to the west of Fairlands is affected by no landscape constraints besides the Green Belt designation (as is common across all of the alternative sites) and it lies on the lowest grade (grade 4+) of agricultural land. This suggests that whilst alternative sites of less environmental quality are available insufficient weight is being given to environmental impacts.

The Sustainability Appraisal is therefore not in accordance with the NPPF2 which gives great weight to conserving and enhancing AONB’s (para 172) and requires plans to ‘allocate land with the least environmental or amenity value’ where consistent with other policies within the Framework. (para 171). Due to this the Appraisal is an unsound document and should not be given weight in the determination of additional allocations.

Attached documents:

Comment: MM44 - LPMM18/5837  Respondent: Thakeham Homes (Sir or Madam) 17976417  Agent: RPS Planning & Development (Mr Cameron Austin-Fell BA)

MM44 – see MM39/MM41

Main Modification 39 (MM39) – Site A61

The Modifications suggest that the greatest contribution to early housing delivery will be made via a constrained site with an uncertain delivery. The Sustainability Appraisal determines Aaron’s Hill as the most appropriate larger site due to its location in relation to Godalming and its relationship to the emerging proposed allocation in the Waverley Local Plan Part 2.

The Waverley Local Plan is not however far advanced, currently at preferred options stage. It cannot therefore be given weight in determining the suitability of the site. The relevant proposed allocation has also been submitted as a planning application, but this is not decided and is currently the subject of several environmental concerns and consultation objections. Adoption of the Waverley Local Plan is not anticipated until late 2019, and prior to approval of the above-mentioned site (if this should be achieved) the comprehensive design requirements of a cross boundary site under separate applications and the delivery of infrastructure across multiple Council’s should only hinder the delivery of the site. The delivery of a site of this scale within the first 5 years of the plan with these delivery constraints is therefore unlikely and its inclusion would make the plan unsound.

MM41 – Site A43 Garlicks Arch

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states that ‘higher growth at Send/Marsh may be considered problematic on the basis that this area is already set to receive a considerable amount of housing’ but concludes this with ‘however it is again difficult to assign any particular weight to this consideration.’ (page 60)

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In addition, no reference is made to the additional SANG requirement needed to accommodate the additional homes proposed at site A43. In addition to the requirement to protect the Thames Basin Heath Special Protection Area, the development of both this site and site A63 will impact on the Papercourt SSSI which lies within 400m of the sites. Particularly if the SANG capacity above is not provided for these developments could place additional pressure on the most significant habitat that is in close proximity to any of the omission sites. Evidence should therefore be provided to demonstrate that the site is capable of accommodating this additional area of SANG in order that the sites development does not harm the SSSI and to demonstrate accordance with emerging Policy P5 (Thames Basin Heaths Special Protection Area).

Attached documents:

**Comment:** MM45 - LPMM18/6264 **Respondent:** Thakeham Homes (Sir or Madam) 17976417 **Agent:** RPS Planning & Development (Mr Cameron Austin-Fell BA)

**MM45 – see MM39**

**Main Modification 39 (MM39) – Site A61**

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Attached documents:

**Comment:** MM2 - LPMM18/3004 **Respondent:** David Wilson 18641057 **Agent:**
I am writing to **OBJECT** to a number of the modifications and matters relating to the modifications to the Local Plan.

1. **Number of Houses – MM2 - OBJECT**
2. In the current version of the Plan the number of houses has increased from the previous version. This is despite the fact that the 20th September 2018 ONS household growth projections for Guildford have reduced. In fact, the ONS number of projected growth in households over the relevant plan period has now reduced from 11,142 (old version of Plan) to 6,635 ……. a reduction of 4,507.
3. The household growth figures are therefore materially wrong.
4. Because of these huge discrepancies between the assumed housing growth in both the old and new versions of the Plan, and the correct ONS figures, **the Public Examination of the Plan by the Planning Inspector should be reopened (MM2).**

Attached documents:

**Comment:** MM2 - LPMM18/3008 **Respondent:** David Wilson 18641057 **Agent:**

5. **Methodology of Plan and Modifications- OBJECT**

a. The Plan and its modifications have not properly observed the correct hierarchy of development, and in particular, Brownfield opportunities in the town centre have not been made sufficient use of. (Policy S3, MM3)

Attached documents:

**Comment:** MM3 - LPMM18/3005 **Respondent:** David Wilson 18641057 **Agent:**

2. **Town Centre new policy S3 - MM3- OBJECT**

a. The town centre policy is woolly, unsound and inappropriate. When you take account of the current well-established trend for retail selling space to be replaced by internet sales, far more house building should take place in the town centre, and far less retail development. Indeed, there should be a plan for making use of future reductions in retail space in the town centre, and using these for housing. This would have the add on benefit of reducing journey times and pollution for people working in the city centre.

Attached documents:

**Comment:** MM40 - LPMM18/3007 **Respondent:** David Wilson 18641057 **Agent:**

4. **Former Wisley Airfield – MM40 Policy A35- OBJECT**

a. It is a nonsense for this site to still be included in the Plan when the development application of similar scale was refused by the Council (15/P/00012) and on appeal was subsequently rejected by the Secretary of State.

b. Additionally, when you look at the reduced ONS projection for housing growth, at least two of the “strategic sites” should now be removed from the Plan.
Comment: MM9 - LPMM18/3006  Respondent: David Wilson 18641057  Agent:

3. Green Belt - MM9 - Policy P2- OBJECT

a. This policy needs completely reworking to take account of the reduced housing needs.

b. There should no longer be a need for insetting of villages

c. The GBC never produced a plausible argument for the exceptional circumstances required to build on the Green Belt, and now it is clear that there should NO BUILDING ON THE GREENBELT AND INSETTING OF VILLAGES.

Comment: MM11 - LPMM18/6059  Respondent: Surrey County Council (Mr James Greene) 19097313  Agent:

Guildford Borough Council Consultation on Schedule of Main Modifications to the Submission Local Plan (2017) September 2018

Thank you for consulting Surrey County Council on the schedule of proposed Main Modifications to the Guildford Borough Submission Local Plan.

We have comments to make which relate to our role as the county authority for flooding, education and minerals and waste planning policy. You notified our heritage conservation team directly about the consultation and so the team has submitted separate comments, via the online portal, regarding Main Modification 25.

With regard to surface flood water management, by way of a general comment, we would draw the borough council’s attention to the recent changes to the National Planning Policy Framework July 2018. In particular, it should be noted that paragraph 165 strengthens the requirement for SUDs for all developments at risk of flooding, unless there is clear evidence that this is inappropriate. It also includes a reference to the County Council’s role as lead local flood authority. We suggest that consideration should be given to incorporating this new guidance in the final version of the Local Plan.

Our comments on two specific Main Modifications are set out below.

Comment: MM39 - LPMM18/4672  Respondent: Surrey County Council (Mr James Greene) 19097313  Agent:

MM39 Policy A61 Aaron’s Hill
Description - Key Considerations

Green Oak Primary School should be referred to as “Green Oak C of E Primary School”

Attached documents:
MM45 Policy A64
Land between Glaziers Lane and Strawberry Farm Flexford

We are concerned about the proposals to redevelop the land between Glaziers Lane and Strawberry Farm, Flexford, Normandy because of the potential impact that the proposed residential units could have on the existing Strawberry Farm Waste site. The proposed new residential development in such close proximity to the facility could potentially comprise a future threat to the operation of this existing site. It is therefore considered, in accordance of paragraph 182 of the NPPF, that the plan making authority, as ‘the agent of change’ in promoting this development, must ensure that suitable mitigation can feasibly be delivered to safeguard the future operation of the existing waste facility.

Attached documents:

Comment: MM2 - LPMM18/5950  Respondent: Waverley Borough Council (Gayle Wootton) 19607073  Agent: 1973 of 2554

Guildford Local Plan: Main Modifications Consultation

I am writing on behalf of Waverley Borough Council in response to the proposed Main Modifications to the Guildford Local Plan: Strategy and Sites.

The Council’s comments are set out below:

Policy S2 – MM2

The Council’s comments relate to the issue of unmet housing need from Woking. During the Examination Hearings the Inspector issued his note ID/6, which included a section on unmet housing need. In that section the Inspector stated that Guildford should be seeking to accommodate a meaningful amount of around 25%, which he calculated as 787 dwellings. The Inspector noted that in Waverley, which was being asked to pick up 50% of the unmet need, the allowance was being spread over the whole Plan period. He said that if the same approach was taken in Guildford, this would amount to 41 dwellings per annum (dpa).

It is noted that in the proposed modifications, an allowance has been included for 42 dpa as a contribution towards the Woking unmet need. However, this is only applied to the period from 2019, rather than from the start of the Plan period (2015). As a result, the contribution only amounts to 615 dwellings, rather than the 787 identified in the Inspector’s note. The contribution towards the unmet need is, therefore, around 20% not the 25% identified by the Inspector.

The Council appreciates that the Inspector will have given this matter careful consideration. However, in the modifications that Guildford Borough Council is consulting on, there does not appear to be a justification as to why the contribution towards the Woking unmet need does not apply from the start of the Plan period. This was the approach taken with the Waverley modifications. If there is a justification for not including this within the period 2015 to 2019, then it is still possible for Guildford to contribute towards meeting 25% of the unmet need, by increasing the contribution for the period 2019 to 2034 from 41 to 53 dpa, which would ensure delivery of the 787 identified by the Inspector in his note. From the information available there appears to be no reason why this increase in the contribution to Woking’s unmet needs cannot be accommodated, given that the Plan anticipates a total supply of 15,107 against a proposed target of 12,600.

Attached documents:
Comment: MM39 - LPMM18/5951  Respondent: Waverley Borough Council (Gayle Wootton) 19607073  Agent:

Policy A61 – MM39

This relates to land at Aaron’s Hill on the edge of Godalming. This is one of a number of sites that Guildford Borough Council is proposing to allocate in order to deliver more housing in the first five years of the Plan than originally proposed. The first observation is that it will be necessary for Guildford Borough Council to be satisfied that this site is capable of delivering housing in that timescale. If the site is to be brought forward, then it is essential that there is proper integration of the proposals for this site with the adjoining site within Waverley Borough and the Council welcomes the commitment to comprehensive masterplanning in requirement 1. However, it wishes to see an emphasis on infrastructure added into this requirement within the policy. Many of the impacts will be felt by residents of Waverley and so it is imperative that infrastructure contributions are sought to address impacts on either side of the Borough boundary. It will be essential to ensure that any potential cross-boundary impacts are properly addressed and mitigated if this development is to go ahead.

Attached documents:

Comment: MM43 - LPMM18/5952  Respondent: Waverley Borough Council (Gayle Wootton) 19607073  Agent:

Policy A62 – MM43

This relates to land at Hornhatch Farm in Chilworth, another site brought into the Plan to boost housing supply in the early years. The Council notes that this site adjoins the boundary with Waverley. Therefore, if this site is to come forward, it is essential that any cross boundary impacts, such as from additional traffic, are addressed within the policy. Careful consideration will also need to be given to the landscaping, given that the adjoining land in Waverley to the south is within the Green Belt and the AGLV.

Attached documents:

Comment: MM2 - LPMM18/1754  Respondent: Wisley Action Group (Dr Malcolm Aish) 19627297  Agent:

Dear Sir,

I strongly object to the Main Modifications.

I support the representation made by the Wisley Action Group which was written with advice from Richard Harwood QC.

1. The housing projections in MM2 are overstated. Half the 'requirement' is for students who will leave at the end of their course. The latest ONS figures recognise this. The Hearing should be re-opened to take account of the latest figures. This should eliminate the requirement for Guildford to take Woking's unmet need and the release of Green Belt for this purpose.

Attached documents:

Comment: MM23 - LPMM18/1758  Respondent: Wisley Action Group (Dr Malcolm Aish) 19627297  Agent:
3. MM23 reduces the requirements for sustainability on pedestrian and cycle routes and for design constraints. The recent case of 'People over Wind' needs to be taken into account

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/1757</th>
<th>Respondent: Wisley Action Group (Dr Malcolm Aish) 19627297</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. The Transport Strategy in MM41 needs to be re-modelled to include the delay in J10 Highways England RIS Scheme and its impact on Site A35 and others.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM50 - LPMM18/1759</th>
<th>Respondent: Wisley Action Group (Dr Malcolm Aish) 19627297</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>4. I live next to the additional land for site A35. Much of this land is unsuitable for housing due to its proximity to the air traffic control VOR beacon and the Ockham Conservation Area and is visible from the Surrey Hills AONB. The site A35 qualifies for SNCI status and there is no justification for altering the boundary which would result in a severe reduction in biodiversity. The absence of an Appropriate Assessment and Habitats Regulation Assessment is in breach of case law.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM44 - LPMM18/2101</th>
<th>Respondent: Chris Wood 20020353</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I strongly object to the proposed main modifications. This proposal is for inappropriate residential development within the Green Belt with no statement of justification, no indication of any Very Special Circumstances for the development and it is completely contradictory to MM9 Policy P2 as regards development within the Green Belt.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The proposal for 120 houses is extremely excessive and creates an overly dense form of development when compared against the surrounding form of development which comprises a mix of detached and semi-detached bungalows and cottage style houses. A rough calculation of the local density for a site of the same gross area would indicate a figure of around 70 units as more in keeping with the character of the immediate area. A dense development would detract from this rural character and what can now be regarded as a countryside street scene would become much more suburban.

The substantial increase in vehicular traffic would further impact on the Send Crossroads, and considerably increase the potential for incidents at the sharp and narrow bend in the road at Send Marsh Green which is already quite dangerous and the narrowing of the road over a small bridge just past Old Hall.

This proposal would also have a huge impact on the local wildlife which currently includes wild deer, bats, barn owls, little owls, nesting buzzards, nesting green and spotted woodpeckers, heron and many other species of flora and fauna.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

**Attached documents:**
Comment: MM41 - LPMM18/3  Respondent: Mr Paul Broughton 20364545  Agent:

I find it deplorable that despite all of the objections to the development of Garlicks Arch you have seen fit to increase this from 400 to 550 homes. There is not enough infrastructure to support this level of development - roads, doctors, schools etc. Your desire to turn Ripley, Send Marsh, Send and Burnt Common into 1 village is destroying this part of the borough. You are doing away with the reason why people want to live here. The destruction of this age of woodland, and the biodiversity this supports is unwarranted. The fact you can take land out of green belt and then build on it may be legal but is immoral.

Attached documents:

Comment: MM42 - LPMM18/4  Respondent: Mr Paul Broughton 20364545  Agent:

These changes are just to allow you to build more than originally planned. This despite all of the objections of over development, lack of road capacity and the fact there are other sites ready for use e.g. expansion of Slyfield. You are destroying the look and feel of this part of the borough. People and goods will have to come by road. There is no close, reliable public transport. You are adding to congestion, degradation in air quality and the environment.

Attached documents:

Comment: MM44 - LPMM18/5  Respondent: Mr Paul Broughton 20364545  Agent:

The village has insufficient resources for these homes - roads, schools, doctors, public transport

Attached documents:

Comment: MM43 - LPMM18/26  Respondent: Sam Burgess 20370049  Agent:

MM43 POLICY A62: Land at Hornhatch Farm, adjoining New Road, Chilworth

Dear sir/madam,

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

[Details redacted], I grew up in the adjacent village of bramley, I went to primary school at Salford infant, middle school at tillingbourne (adjacent to horn hatch farm) and secondary at glebelands in Cranleigh.

I grew up in [details redacted], Bramley/Shalford. most of my immediate family live in Bramley/shalford/guildford.

I spent the majority of my time in the above villages.
I feel that adding 80 homes to hornhatch farm, near Chilworth, or the village of Shalford that it comes under would have a negative effect on the surround villages.

My reasons are stated below

1. It is unsustainable taking into consideration the local amenities
2. it would increase the already strain on the A281
3. It would further dilute the village environment on the villages of chilworth, Shalford, bramley, wonersh and shamley green with the increase of people not accustomed to living in a village.
4. The loss of precious greenbelt land in an area of nature beauty
5. The nearest supermarkets are Sainsburys, Waitrose in Godalming, Sainsburys, co op in Cranleigh, and Tesco's, Waitrose in Guildford, which would further traffic in those already heavy traffic area's.
6. Would put strain on local area's of wildlife and beauty spots which include, Chinthurst hill, St Martha's, Pewly down & Blackheath
7. would increase parish, and Guildford borough council tax for the area to residents to accommodate 80 new homes.
8. would increase strain on the local schools surrounding the area particularly Salford, Bramley and Tillingbourne schools.
9. would further strain the nearest doctors surgery which is wonersh surgery.
10. traditional villages are becoming more and more diluted by building on greenbelt land and traffic, the Surrey hills and surrounding area is a substantial addition to the south of England un tainted by city life, Guildford has already been overrun by commuters and some unfortunate people who have not experienced living in a small community that is a village, they have not experienced the ability to step outside there front door to be met with woodland and countryside, chilworth and the surrounding villages are already operating at there maximum capacity whilst retaining a village community and feel, these are the qualities that draw people to the area. whilst increasing the population will unfortunately and undeniably tip it over the edge.

Attached documents:

Comment: MM2 - LPMM18/2411  Respondent: Michael Williams Planning (Mr Michael Williams) 20377153
Agent:

OBJECTIONS set out in five parts:
. Policy S2 – Spatial Strategy
. Cross-reference to SHMA Reports
. Deliverability & the NPPF
. Mods Sites A63 & A64
. Substitution Site Advocated – Land at Ripley

(1) Policy S2 – Spatial Strategy
We consider that the OAN of 671 dwellings per annum does not fully reflect the housing need of the Borough, and the stepped trajectory is unsatisfactory. The Inspector’s note on this subject raised concerns, as follows:

“It would negate the purpose of the 20% buffer (which the Council accept), frustrate attempts to address key factors affecting worsening affordability, and would be contrary to Government policy which is seeking to boost the supply of housing.”
Extending that point, the Inspector’s note on OAN sets out that in not adopting a stepped trajectory, GBC should identify additional sources of housing delivery in the early years of the Plan and should aim for a flat trajectory and not rely on completion of the A3 Road Improvement Strategy, which is not due until at least 2027.

Our overall conclusion is that additional housing sites are vital and necessary to increase delivery rates early in the Plan period (see Section 3). Clearly, the Modifications are responsive, but they are insufficiently attuned to realistic delivery rates- especially in relation to Wisley Airfield. Moreover, there is the update in OAN, via the population projections and economic growth conclusions to consider, as set out in Section (2), below.

But before coming to that, we also feel that there is a philosophical deficit in the Plan’s dependence on small sites (below 30 units) and (very often) displacement of commercial uses; many of which perform valid functions for community/ societal needs. Instead, there should be greater emphasis on sites of between 100-250 units – allowing for new open space to be created; for affordable and mixed housing; and for cohesive layouts/ development patterns to be achieved. These functional attributes are much more difficult to realise through small/ piecemeal site development.

(2) Cross-reference to the two key SHMA Reports
We refer to the May 2014 Draft Guildford SHMA Report and the December 2014 Surrey SHMA in respect of Guildford Borough. The later report updates the 2012 Sub-National population projections as the starting point for considering housing need.

The December Report acknowledges that accurately projecting household formation rates is difficult, but the adopted model shows a need for 549 homes per year. However, alongside that is the result of the Guildford Employment Needs Assessment, prepared by URS: this reveals higher than expected growth in jobs.

As a result, the December Report indicates that housing provision may need to be adjusted upwards from the “demographic-led” figure. That leads to a need for 712 homes per year to support the projected economic growth within the Borough.

Overall, the December Draft SHMA Report concludes by identifying a need for between 620 – 816 homes per annum in Guildford Borough. The full OAN is described as 816 homes per annum. As that figure is based on the latest population projections, predicted economic growth and G.L. Hearn’s stats on student growth Persimmon Homes consider that the Local Plan should be based on 816 dpa; and that further housing sites will be necessary. We urge that the site at Ripley, set out in Section 5, below be considered.

(3) Deliverability and the NPPF
Persimmon Homes’ direct experience, as a national developer, is that very large sites, with major infrastructure requirements, are simply not delivering the quantum of units required within initially anticipated timescales.

For its part, Guildford Borough is placing over reliance on a number of exceptionally large sites - such as the Former Wisley Airfield (2,000 homes) and the Slyfield Regeneration Project (1,500 homes) both of which require major infrastructure. And, therefore, cannot be relied upon to deliver housing in the first five years of the Local Plan. We are concerned that the draft local plan is overly dependent on these exceptionally large sites to deliver the Borough’s housing strategy.

Whilst we have no objection to the principle of large scale sites, there has to be recognition of the significant amount of lead-in time to begin construction of major development - where programmes frequently suffer long term delays and delivery rates can initially be slower than anticipated.

The latest guidance in the NPPF is seeking to ensure housing sites are deliverable and the Inspector in the recent Woolpit (Mid Sussex District) decision (PINS Ref: 3194926) states;

“The up-dated PPG on Housing and economic land availability assessment sets out guidance on what constitutes ‘deliverable sites’ and covers the evidence that a site with outline permission is expected to have in support of its inclusion in the supply. The PPG places great weight on the adequacy and sufficiency of consultation with those responsible for delivering dwellings. It is noteworthy that in this case, the Council has failed to adequately demonstrate it has done so. An assessment of the Council’s AMR against the updated PPG reveals that the AMR falls substantially short of producing that evidence that a LPA is expected to produce”.
As a result of this decision, the Council should provide clear evidence that all sites granted outline permission can start to deliver housing within 5 years, otherwise the Council's five year land supply can be called into question.

As noted earlier, where major infrastructure is required the delivery will be delayed early in the plan period or the rate will be significantly slower than anticipated. Put simply, Guildford Borough do not want to look back in five years asking why their housing target is unmet? And this is likely to be with case with the infrastructure, land issues, and build complexities of the major allocated sites. Based on Persimmon Homes' current experience, this is inevitable. Moreover, the draft Letwin analysis makes it clear that a range of sites need to come forward (both large and small sites). Paragraph 21 of this report states: ‘this cannot be a question of either / or. We will continue to need more new housing both on smaller sites and on large sites’. This is now reflected in the NPPF which states there should be a sufficient mix of sites (para 67) acknowledging the important contribution of small and medium sites for early delivery (para 68).

Consequently, the (Plan’s) over-reliance on a number of major allocations is contrary to that advice. Additional housing allocations should be made on smaller sites of up to 250 units ensuring a steady supply of land for housing in the first five years (where the need is very great), and throughout the plan period. The current contingent is not enough, especially with the over reliance on a number of large sites and against the context of a growing affordability issue in the Borough.

Since the publication of the White paper, ‘Fixing Our Broken Housing Market’ central Government has been adamant that both national and local housing production has been far below that needed. This is both as measured demographically and as measured through market signals – largely in terms of affordability ratio’s. The political, social and planning importance of increasing housing output from the very low levels currently being achieved has permeated every facet of advice issued by DCLG and Ministerial speeches.

NPPF (March 2012) highlights the need to boost significantly the supply of housing whilst the NPPF (July 2018) strengthens further the importance which Central Government attaches to increasing housing production since it was one of the primary reasons for reviewing the document with Paragraph 59 of the NPPF stating:

“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.

4) Modifications Sites A63 and A64 - Objection

Respectively, land West of Alderton’s Farm, Send (120 dwellings) and land at Flexford (105 dwellings).

... The Alderton’s Farm’s allocation ignores the (settlement) impact of the 550 dwellings, etc development (already planned), and close by at Garlick’s Arch. This allocation has increased from 400 dwellings to 550 units: in short, the village will be overwhelmed if it is now to take a further 120 dwellings at Alderton’s Farm.

... The Mods site at Flexford is remote and has little by way of social infrastructure; its only merit is the local rail station. The position is clearly seen when one considers the distance between the “development site” and its nearest local facilities:

. 1km to the nearest primary school
. 1km to the nearest health facility
. 1km to the nearest “A” category road
. 1km to the nearest public open space
. 0.75km to the nearest village hall.

Instead we urge that land controlled by Persimmon Homes Thames Valley at Georgelands/ Devonia Farm, on the west flank of Ripley be considered before these sites as much needed housing can be delivered within five years if the site were to carry an allocation for housing. The site details are as follows.

5) Details of the Proposed Substitution Site/ or Candidate for additional housing land release
This site has no impact on the gap between Ripley and Send Marsh, for the reason that the Grove Heath Neighbourhood stands mid-way between the two settlements. This is illustrated in the plan below, which also shows the close distance of the "substitution site" (marked “A”) to the village centre.

- The site is outside the Ripley Conservation Area.
- It is within walking distance of the Village Centre – see the plan below.
- The site is only 3 minutes walk to the local Primary School.
- It is practically adjacent to the local Health Centre.
- Direct access to a Category “A” road is achievable.

Overall, this block of land amounts to 25.97 acres, of which 12.66 acres would be developed for housing: a yield of approximately 200 dwellings, 40% of which would be affordable units.

The preliminary layout on page 8, below, shows Public Open Space on the south flank of the site, and also along the west boundary: that means that the development area has a settled appearance and strong green boundaries, with little discernible profile from the Portsmouth Road. These public open spaces / green corridors/ and SANG elements amount to 11 acres.

The site is under the control of Persimmon Homes, a major housebuilder with a track record of building out consented schemes as soon as practicable. Commencement and development completion is possible within the next 3 years.

The location is shown below, followed by a red-lined plan, and then a preliminary layout to show the development configuration and open space elements.

[See attached PDF for maps]

Attached documents: Ripleyfinal.pdf (1.5 MB)

Comment: MM35 - LPMM18/12  Respondent: Mr Raymond Whiteley 20391521  Agent: The proposed addition of 1800 new houses and therefore over 4000 additional cars at Gosden Hill Farm will cause gridlock at Burpham that the modifications to the transport strategy fail to address.

At present there are constantly very long queues along the B2234 New Inn Lane up to the roundabout with the A3100 which have recently been made much worse by the new Aldi situated opposite the roundabout. Cars in the queue to get into the Aldi car park regularly block the roundabout allowing no cars to proceed along the B2234 and turn right onto the A3100.

With the addition of the Golden Hill Farm development cars coming from Merrow to the A3 will no longer be able to go down Merrow Lane to avoid this roundabout and in addition many of the over 4000 new cars from this development will have to use this same roundabout to access the A3100 into Guildford.

I can see no provision in the original local plan or modifications to the transport strategy to to address this serious road traffic issue.

I therefore object to the local plan Policy A25 Golden Hill Farm and the proposed main modifications MM35 as they are currently set out.

Attached documents:
Comment: MM2 - LPMM18/13  Respondent: Mr James Masterman 20392641  Agent:

MM2 - 12600 new homes represents an increase of 30% in housing stock and population. Local roads into and out of Guildford are already chronically congested from all directions. The A3 through Guildford is a dangerous, noisy, polluting local, regional and national embarrassment. A 30% increase in homes and population with only minor tinkering with infrastructure is NOT A VIALABLE PLAN. It is rather a shot in the dark, with the gun held to the heads of local Guildford residents. The modelling details and assumptions have never been explained or properly justified to local residents associations, despite multiple representations throughout this planning process. But nothing seems to shift you guys - keep going then, but on your heads and consciences, be it. And be brave enough to put your names to this "plan".

Attached documents:

Comment: MM2 - LPMM18/153  Respondent: Mr James Masterman 20392641  Agent:

The ONS has reduced its population growth figures by 40%, meaning 4662 new households in the Guilford Borough, by 2034, rather than 7717 previously predicted. This new housing need can now be met from the utilisation of brownfield sites alone, and should clearly preferentially be done so. In turn this will preserve the greenbelt, negating the need to build on sites such as Gosden Hill. The Guildford plan must be changed to reflect these new population growth figures.

Attached documents:

Comment: MM27 - LPMM18/15  Respondent: Mr James Masterman 20392641  Agent:

The proposed changes to the A3 will solve none of its problems, and will cause huge disruption if attempted. BE BOLD AND BRAVE AND DO SOMETHING THAT WILL, AND THAT WILL GARNER THE SUPPORT OF RESIDENTS. GUILDFORD NEEDS A TUNNEL SO BUILD ONE. And if you need an example of how effective this can be, just go 15 miles south and visit Hindhead.

Attached documents:

Comment: MM35 - LPMM18/16  Respondent: Mr James Masterman 20392641  Agent:

MM35 - 1800 new homes at Gosden Hill will double the housing stock of Merrow and Burpham. Infrastructure cannot cope today - have any of you stood outside Aldi Burpham recently, pretty much any time of day? The infrastructure / rail link / schools ......part of "the plan" remains inspirational and not factual. Anyone who thinks a rail station will be built by any rail company, or who believes that the local residents believe this will happen, must be completely delusional. No local area should suffer more than their natural proportion of the local plan for new house building, meaning max 600 houses at Gosden Hill.

And please also refer to your own section 27, green belt protected from development. Which means no houses at Gosden Hill, unless I am missing something??

Attached documents:
Comment: MM9 - LPMM18/14  Respondent: Mr James Masterman 20392641  Agent:

MM9 : You open this section by saying that the Green belt will continue to be protected against development. (Forget your "get out" words such as "according to the policies map" and "inappropriate"). So 1700 new homes on the green belt at Gosden Hill Farm? Am I missing something, or are you making this up as you go along? **OBJECTION!!**

Attached documents:

Comment: MM39 - LPMM18/21  Respondent: Mrs E Komor 20408737  Agent:

The key consideration not even mentioned in your schedule is the impact on the already dire traffic situation on Eashing Lane and Flambard Way, Godalming.

I am disgusted that the decision to ruin the lives of the current residents is even being considered.

Eashing Lane CANNOT COPE with anymore traffic.

Portsmouth Road CANNOT COPE with anymore traffic.

Flambard Way CANNOT COPE with anymore traffic.

The A3 CANNOT COPE with anymore traffic.

When there is an accident on the A3 and traffic is diverted through Milford and Eashing Lane the whole of Godalming is gridlocked.

With this proposed housing plan alongside the Ockford Park Aarons Hill building of 262 homes this would mean 800 more cars on Eashing Lane. **THIS WOULD MAKE GODALMING PERMANENTLY GRIDLOCKED.**

There needs to be a year study on the current traffic levels on Eashing Lane, Portsmouth Road, Flambard Way, A3 Milford to Guildford to show how bad at rush hour when all the schools and colleges are in term the traffic is. Then apply the impact of the 462 houses being built at Aarons Hill and the traffic chaos that will ensue.

Please provide your traffic analysis regarding your proposed plan.

Attached documents:

Comment: MM32 - LPMM18/29  Respondent: Ms Anne Deacon 20453409  Agent:

Have you any architects plans for this development? How many stories are proposed for the residential usage?

Should have left it as the hotel and adapted that years ago

Attached documents:

Comment: MM33 - LPMM18/30  Respondent: Ms Anne Deacon 20453409  Agent:
is it possible to change the access? Either add an entrance off the A3 or make the filter lane coming from Woking direction longer, which is the easiest option and would take a few foot of the waste ground which nobody uses any more as nobody walks anymore. This causes traffic bottlenecks at 7.30 am!! Just to get through the Slyfield traffic lights.

Attached documents:

Comment: MM35 - LPMM18/31  Respondent: Ms Anne Deacon 20453409  Agent:

If you are going to build a new estate (or have to to fit government plans which who knows if they get their immigration policy together we might not need all this extra housing for our already overcrowded island - please do not replace a farm/rural area with a high density estate with no front gardens and no possibility for mature trees to ever grow. A "Green" in the centre is not the same.

Attached documents:

Comment: MM37 - LPMM18/32  Respondent: Ms Anne Deacon 20453409  Agent:

Could you make your maps simpler? Without going and looking it is impossible to see what is changing. Maybe add photos? What is there now?

Attached documents:

Comment: MM37 - LPMM18/33  Respondent: Ms Anne Deacon 20453409  Agent:

How much of this farmland is being destroyed?

Attached documents:

Comment: MM43 - LPMM18/34  Respondent: Ms Anne Deacon 20453409  Agent:

please ensure this is not high density housing with no front gardens and no room for mature trees

Attached documents:

Comment: MM44 - LPMM18/35  Respondent: Ms Anne Deacon 20453409  Agent:

I need to save this comment! Ditto - no development without front gardens and room for mature trees
and the same again - no high density housing and without front gardens and room for mature trees

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.

Whilst I am fully aware that Guildford and the surrounding area needs more housing, I feel that the proposed 80 properties will put considerable pressure on the infra structure of both, Chilworth, Shalford and Wonersh. All the extra traffic will be funnelled onto an already congested junction, which is also impacted at school drop off and collection times. This traffic will then head along the A248 or A281. The A281 is easily congested and is going to be put under even more extreme pressure with the Dunsfold development, so the extra volume of traffic that 80 properties generate will just add to the strain on an already heavily used road junction and adjoining roads. I therefore feel that this development should be rejected.
**Comment: MM41 - LPMM18/49  Respondent: Mr James Jackson 20511297  Agent:**

This proposal is excessive, it is devastating as it is green belt containing ancient woodland.

Excessive amount of vehicles, where will they all go?

no school and medical facilities, Send is almost full, how short sited to close a primary school in Ripley

**Attached documents:**

---

**Comment: MM42 - LPMM18/51  Respondent: Mr James Jackson 20511297  Agent:**

there is no need for this size of industrial site this large close to a residential area. Send is village, there is no proven demand in the area for such a large area. The employment land needs assessment shows a reduction in demand for industrial land.

The nitrogen dioxide levels are dangerous already, there will be related health issues with no health facilities to cope

**Attached documents:**

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**Comment: MM44 - LPMM18/50  Respondent: Mr James Jackson 20511297  Agent:**

This is green belt, there are no special circumstances

as MM41 this will increase road traffic on small local residential roads.

There is NO infrastructure, where will the children who will no doubt live in these properties go to school both primary or high school.

**Attached documents:**

---

**Comment: MM41 - LPMM18/56  Respondent: Christopher Barlow 20514881  Agent:**

I hereby reject the development proposals of the GBC as detailed in the "High Noon for Send" action newsletter dated 25.9.18. I am also writing on behalf of my grandmothers address [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

My name is Christopher James Barlow, This address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

Send is primarily a green belt area and should be treated as such. Send Marsh also contains ANCIENT WOODLAND which must not be developed upon. I do not appreciate the GBC's attitude in handling this matter.
I also object to MM27, MM41, MM42, M48 due to the traffic implications that are going to several impact Send barns lane and send road. The noise and pollution will be unacceptable.

Attached documents:

I object to MM41 land at Garlicks Arch, Send Marsh. policy A43.

This is a massive increase on proposed houses. 7000 people have already objected to this. There is ancient woodland that will be destroyed.

The local facilities and infrastructure will not be able to cope.

Attached documents:

I also object to MM27, MM41, MM42, M48 due to the traffic implications that are going to several impact Send barns lane and send road. The noise and pollution will be unacceptable.

Attached documents:
I also object to MM42 m Burnt common road. Policy A58. We do not need new industrial sites on green belt land. Slyfield has capacity already so this cannot be justified. Traffic considering do not appear to have been taken into account.

Attached documents:

**Comment:** MM44 - LPMM18/96  **Respondent:** David Kean 20542785  **Agent:**

I , David Kean , [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] would like to object to the proposed local plan for Send.

I object to MM44 at Alderton’s farm, Send Marsh road policy A63 on the basis that this is green belt land and the local traffic particularly at Send crossroads will not be able cope. This proposal was deleted from an earlier draft and has now been re inserted.

Attached documents:

**Comment:** MM48 - LPMM18/100  **Respondent:** David Kean 20542785  **Agent:**

I also object to MM27,MM41,MM42,M48 due to the traffic implications that are going to several impact Send barns lane and send road. The noise and pollution will be unacceptable.

Attached documents:

**Comment:** MM27 - LPMM18/109  **Respondent:** Chris Smith 20545313  **Agent:**

I would like to object to proposed changes in my village, Send. The reference numbers are MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48.

The proposed developments will constitute over development and the road infrastructure will not cope. The traffic around Send and Ripley is bad already. Much of the developments will be on Green Belt land.

Attached documents:

**Comment:** MM41 - LPMM18/104  **Respondent:** Chris Smith 20545313  **Agent:**

I would like to object to proposed changes in my village, Send. The reference numbers are MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48.
The proposed developments will constitute over development and the road infrastructure will not cope. The traffic around Send and Ripley is bad already. Much of the developments will be on Green Belt land.

Attached documents:

Comment: MM42 - LPMM18/105  Respondent: Chris Smith 20545313  Agent:

I would like to object to proposed changes in my village, Send. The reference numbers are MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48.

The proposed developments will constitute over development and the road infrastructure will not cope. The traffic around Send and Ripley is bad already. Much of the developments will be on Green Belt land.

Attached documents:

Comment: MM44 - LPMM18/106  Respondent: Chris Smith 20545313  Agent:

I would like to object to proposed changes in my village, Send. The reference numbers are MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48.

The proposed developments will constitute over development and the road infrastructure will not cope. The traffic around Send and Ripley is bad already. Much of the developments will be on Green Belt land.

Attached documents:

Comment: MM48 - LPMM18/113  Respondent: Chris Smith 20545313  Agent:

I would like to object to proposed changes in my village, Send. The reference numbers are MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48.

The proposed developments will constitute over development and the road infrastructure will not cope. The traffic around Send and Ripley is bad already. Much of the developments will be on Green Belt land.

Attached documents:

Comment: MM9 - LPMM18/108  Respondent: Chris Smith 20545313  Agent:

I would like to object to proposed changes in my village, Send. The reference numbers are MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48.
The proposed developments will constitute over development and the road infrastructure will not cope. The traffic around Send and Ripley is bad already. Much of the developments will be on Green Belt land.

**Comment:** MM37 - LPMM18/128  **Respondent:** Mrs Nicola Carol Brown 20546209  **Agent:** MM37, MM41, MM42and MM48

I am extremely concerned about the traffic implications arising from the proposed developments and it is hard to see that proposed changes to the A3 and Clandon slip roads would help. The huge increase to road use with resultant queues and pollution is of grave concern.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/124  **Respondent:** Mrs Nicola Carol Brown 20546209  **Agent:** MM41 Policy A43

I am writing to object to modifications proposed to the local plan following the Inspector's report.

MM41 Policy A43

I find it extraordinary that, notwithstanding the 7000 odd objections previously made, this modification proposes an increase in housing allocation. The objections I have already made still apply and with even greater urgency in view of this proposed increase. Specifically I object to:

- the affect on Green Belt and the ancient woodland;
- inappropriate and excessive development affecting the nature of the villages of Send and Ripley causing great pressure on the roads and services such as schools and GP surgeries. Send and Ripley will effectively become conjoined;
- flooding problems at the site, which will further exacerbate flooding problems to surrounding areas;
- the increase in traffic will have a negative impact on the already busy local roads.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/129  **Respondent:** Mrs Nicola Carol Brown 20546209  **Agent:** MM37, MM41, MM42and MM48

I am extremely concerned about the traffic implications arising from the proposed developments and it is hard to see that proposed changes to the A3 and Clandon slip roads would help. The huge increase to road use with resultant queues and pollution is of grave concern.

**Attached documents:**
### Comment: MM42 - LPMM18/125  
**Respondent:** Mrs Nicola Carol Brown 20546209  
**Agent:**

MM42 Policy A58

I object to the increase in industrial and storage allocation. This is by far the largest new industrial allocation in any village in the borough and, indeed, is totally unnecessary in view of unused capacity at Slyfield. Moreover, the Employment Land Needs Assessment showed a reduction in demand for industrial land. This modification contradicts MM9 as there are no special circumstances to site this here in the Green Belt. Again, this would further exacerbate traffic problems to the surrounding roads.

**Attached documents:**

---

### Comment: MM42 - LPMM18/130  
**Respondent:** Mrs Nicola Carol Brown 20546209  
**Agent:**

MM37, MM41, MM42 and MM48

I am extremely concerned about the traffic implications arising from the proposed developments and it is hard to see that proposed changes to the A3 and Clandon slip roads would help. The huge increase to road use with resultant queues and pollution is of grave concern.

**Attached documents:**

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### Comment: MM44 - LPMM18/126  
**Respondent:** Mrs Nicola Carol Brown 20546209  
**Agent:**

MM44 Policy A63

I object most strongly to this new proposal. This was previously removed from the plan because of objections and so was not considered at the inquiry. To introduce it again at this late stage seems underhand and a cynical way of trying to push the development through.

This development will further increase the traffic problems along Send Marsh Road, the Old Portsmouth Road and the Send cross roads which is already congested in rush hours.

The whole character of the area will change - it will create a continuous development along Send Marsh Road, spoiling Send Marsh Green with its heritage buildings and removing the few remaining bits of countryside around the village. Again, this is supposed to be Green Belt so it is in contravention of MM9.

Flooding is also a potential problem as Send Marsh Road regularly floods near the culvert and this development would adversely impact on this problem.

This proposal, along with - Garlicks Arch (550), Clockbarn (60) and Winds Ridge (40) adds 770 houses to the 1700 currently in Send - a huge increase of 45% which is excessive and too great a burden on our infrastructure.

**Attached documents:**
Comment: MM48 - LPMM18/131  Respondent: Mrs Nicola Carol Brown 20546209  Agent:

MM37, MM41, MM42and MM48

I am extremely concerned about the traffic implications arising from the proposed developments and it is hard to see that proposed changes to the A3 and Clandon slip roads would help. The huge increase to road use with resultant queues and pollution is of grave concern.

Attached documents:

Comment: MM9 - LPMM18/127  Respondent: Mrs Nicola Carol Brown 20546209  Agent:

MM9  Green Belt Policy

This modification introduces much uncertainty about what would constitute "limited infilling outside settlement boundaries" and negates Green Belt protection. Surely, infilling should take place within and not outside settlements.

Attached documents:

Comment: MM39 - LPMM18/140  Respondent: Rachael Hogg 20549217  Agent:

Eashing Housing Plan A61

I express my concern and strong objection to the proposed Housing Development Plan at Aaron's Hill Eashing.

The infrastructure plans are inadequate, with insufficient school places and doctors surgery.

The extra traffic would be impossible in Eashing Lane.

Attached documents:

Comment: MM41 - LPMM18/355  Respondent: Mrs Suzanne Loggia 20550209  Agent:

I am writing to strongly object to the MM41 and MM42 proposed building plans.

Firstly it is an excessive amount of homes your proposing to build and this area does not have the correct infrastructure to cope with these properties; i.e we have just lost Ripley 1st School and surrounding other schools are completely full, Doctors and medical facilities are strained already. Traffic and pollution is already horrendous in this area and we are often gridlocked if an accident should arise on the A3.

The Green Belt contains ancient woodland which I feel should be protected!
The site frequently floods and I believe to be contaminated by lead shot. The land also contains electricity pylons and there is a clear association between living close to power lines and an increased risk of cancer. International studies have shown that children living within 50 meters of power lines have an increased risk of developing acute Leukemia!

Attached documents:

**Comment:** MM42 - LPMM18/356  **Respondent:** Mrs Suzanne Loggia 20550209  **Agent:**

As for MM42 at Burnt Common; do we really need more industrial sites in the green belt? when Slyfield has unused units and capacity!

Attached documents:

**Comment:** MM35 - LPMM18/150  **Respondent:** Mr Andrew Johnson 20550849  **Agent:**

My biggest concern is after they built Aldi, Burpham ground to a halt pretty much every weekend and evening...with 1800 new houses just a mile away is the current Burpham infrastructure going to cope. I know there are provisions for new on and off ramps on the A3 up near Clandon area, but people wanting to get to town or to Sainsbury's etc...they're going to come down New Inn Lane? A narrow country lane. The roundabout by Aldi/BP really needs redesigning as it is, with 1800 more houses nearby it will turn into a nightmare!

Attached documents:

**Comment:** MM39 - LPMM18/152  **Respondent:** Mrs Emm Walton 20551713  **Agent:**

There is not the infrastructure and too many proposed houses.

The area is semi-rural and proposed housing is over-development

Attached documents:

**Comment:** MM41 - LPMM18/158  **Respondent:** Miss P McAleese 20554817  **Agent:**

I object to Policy A43. Land at Garlicks Arch.

- There is no proven need for additional 400 new houses on top of the 13,860 already proposed by the borough, and now they have increased that to by 37% to 550.
- The Health Surgery at send cannot cope, the local schools cannot cope.. The entire plan is ill conceived.
- It continues to ignore over 7,000 of previous objections.
- There is no proven demand for Travelling Show people plots in this location.
- There are no “exceptional circumstances” exist for removing this site from the greenbelt.
• The land is subject to frequent flooding and is currently flood Zone 2 allocation.
• It will join the villages of Send and Ripley and defeat one of the intended purposes of the greenbelt.
• The roads in send cannot cope and this will add at least 800 extra cars

Attached documents:

Comment: MM42 - LPMM18/159  

I object to Land at Burnt Common London Road, policy A58

• The exit heading North from the A3 is one of the most dangerous exists, and you want to intentionally put more heavy goods traffic through it.
• They have double the allocation to 14,800 sq m and there is still lots of unused capacity at Slyfield?
• The impact on the surrounding roads will be immense and cause traffic gridlock.
• Nitrogen Dioxide levels are already at dangerous levels.
• It was deleted from the 2014 draft because of the amount of objections made.
• The word “minimum” is changed to the previous maximum in the 2016 plan.
• There is no need to build more industrial or warehouse development in the middle of the greenbelt when Slyfield and Guildford still have empty sites.

Attached documents:

Comment: MM9 - LPMM18/6266  

I object to the erosion of the Green Belt.

Why bother to spend all the money and time constructing the Green Belt in the first place, if you can just remove what you wish to at will.

It is very sad and ill conceived that the Borough wishes to remove any Surrey Villages from the Green Belt.

Attached documents:

Comment: Other comments - LPMM18/157  

I object to the creation of the new north and southbound slip roads to and from the A3.

I live on [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] next to the A3, and worked in and around Ripley since the late 80’s. The major bottle neck is Send Village, which this plan will on exacerbate.

The main danger is the off slip going North at Burnt Common, this will exacerbated with more people using it.
I object to the Limited Consultation Period.

I find it disingenuous to the last minute inclusion of new sites i.e. Garlick’s Arch with less than two weeks notice, just because it would appear that the developer has offered a new on and off slip to the A3.

Summary.

Your plans have blighted my family home for years, the 2014 plan originally put a development at the back of my house, and the 2016 plan changed it to the development at the front of my family home. Now your new plan does both!!!

You ill conceived plans have had a huge detrimental effect on the value of our family home, destroying our views of the farmland at the front and rear. Therefore your poorly thought through local plans have provided uncertainty and anxiety to myself and my family.

As no speed restrictions, speed camera or traffic calming measures on the blind corner heading towards send over the A3 is an accident waiting to happen. As it is we can only turn left when leaving our home and even then it is very dangerous.

You have not addressed the infrastructure requirements such as schools, health centres and hospital capacity, in these proposals, for new homes.

Therefore this plan needs to be thought through, and new alternative proposals need to be looked at..

I trust the above is to your satisfaction, however if you have any questions the best number to get through to me on is the mobile on [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

I am writing to strongly object to the plans for the local area around Send and Ripley. I live in Send and have done for the past 5 years. I also am hoping to move house, staying within the villages. I am disgusted by the suggestions for the local area and feel as though it would destroy the environment both in around both Send and Ripley.

First, I would like to object to the planning on Garliks Arch. (Reference number MM41) This is Green Belt land which contains ancient woodland. We should be doing all we can to preserve and protect our environment and not destroying what's left of it. Regardless of the fact that it is Green Belt land, the extra volume of traffic that this would produce is ridiculous. Even with the impending and expected expansion of the M25/A3 junction, with all the 'suggested' developments in and around the local area, the roads would not be able to cope with the extra traffic. I am also most disappointed that over 7000 objections have been ignored. People's opinions are extremely important, especially if they live in the local area. I feel extremely let down by Guildford Borough Council with regards to this development.
<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/166</th>
<th>Respondent: Matthew Woods 20560225</th>
<th>Agent:</th>
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<tr>
<td>Sadly, it does not end here. I would also like to object to the development of land on the Burnt Common site (Reference number MM42). The public opinions are well documented, yet the council has the audacity and believes it holds the right to increase the industrial and storage space to around 14,800 sqm. Building here makes no sense and contradicts MM9 (The Metropolitan Green Belt, as designated on the Policies Map, will continue to be protected against inappropriate development in accordance with the NPPF). Slyfield has the capacity and space for extra storage units, as well as having two major road networks linking it to Woking and the A3. Not only is the development not needed for this site but the Employment Land Needs Assessment has shown a reduction in the demand for industrial land.</td>
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<th>Respondent: Matthew Woods 20560225</th>
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<tr>
<td>The plan which most affects me personally is the shambles that is the building of 120 homes on Alderton's Farm (Reference number MM44). Living down Send Marsh Road, I consider myself very lucky. It is an exceptionally beautiful place to live with reasonable traffic flows and an abundance of Green Belt land. However, once again it appears that Guildford seem to believe they have the right to destroy this land by building 120 homes on. It is Green Belt land, something which GBC have absolutely no authority to build on despite the 'limited infilling' which is against national legislation. Once again this contradicts MM9 (The Metropolitan Green Belt, as designated on the Policies Map, will continue to be protected against inappropriate development in accordance with the NPPF). Living on the crossroads and travelling down through Send Marsh each day, I know better than most that the demands on the roads will be far too much. The traffic congestion will be abhorrent and there will be sharp rise in pollution levels.</td>
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<th>Comment: MM9 - LPMM18/168</th>
<th>Respondent: Matthew Woods 20560225</th>
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<td>In with MM9 the document refers to the 'limited infilling' which suggests that any land on the edge of villages could be used for development. Is there any point in having Green Belt land if councils like GBC feel they can override this, find loopholes and continue with building works? My favourite part of the whole farce is the lack of any transport 'strategy'. GBC seem intent on building on every plot of land around Send and Ripley, yet they cannot come up with any suggestions on how the local transport network will cope. This excellently highlights just how ridiculous and incompetent the planning committee at GBC are. I am sure that should everything proceed, it won't be long before the same people are scratching their heads and wondering why the pollution levels have sky rocketed and the roads are gridlocked heading into Woking and on both carriageways on the A3 and M25. With the population continuing to rise, the national transport networks are extremely strained, I think it is laughable how anybody can conceivably think that the roads around Send and Ripley will be able to cope with any increase of traffic. Finally, please can somebody explain to me how the Villages Medical Practice and Send Primary School will cope with the suggested increases? Once again, this is another failure of GBC and continues to highlight what a shambles the local plans are.</td>
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I am writing to object to the proposed travellers site and 40 house on Send hill

Not to mention all the other prospered plan such as MM44 & MM41/MM9/MM42/MM48

This was once a peaceful and picturesque little village that has slowly been eroded and destroyed by greedy and thoughtless developers

I have lived in send for 20 years and it is sickening and sad to see it being over developed

So I strongly object to the plans to specified above

Attached documents:
This was once a peaceful and picturesque little village that has slowly been eroded and destroyed by greedy and thoughtless developers.

I have lived in Send for 20 years and it is sickening and sad to see it being over developed.

So I strongly object to the plans to specified above.

**Attached documents:**

---

**Comment:** MM9 - LPMM18/206  **Respondent:** Jake Gibbs 20566913  **Agent:**

I am writing to object to the proposed travellers site and 40 house on Send hill.

Not to mention all the other prospered plan such as MM44 & MM41 / MM9 / MM42/MM48.

This was once a peaceful and picturesque little village that has slowly been eroded and destroyed by greedy and thoughtless developers.

I have lived in Send for 20 years and it is sickening and sad to see it being over developed.

So I strongly object to the plans to specified above.

**Attached documents:**

---

**Comment:** MM2 - LPMM18/208  **Respondent:** Thomas Gibbs 20566945  **Agent:**

I am writing to object to the proposed travellers site and 40 house on Send hill.

Not to mention all the other prospered plan such as MM44 & MM41 / MM9 / MM42/MM48.

This was once a peaceful and picturesque little village that has slowly been eroded and destroyed by greedy and thoughtless developers.

I have lived in Send for 20 years and it is sickening and sad to see it being over developed.

So I strongly object to the plans to specified above.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/210  **Respondent:** Thomas Gibbs 20566945  **Agent:**

Not to mention all the other prospered plan such as MM44 & MM41 / MM9 / MM42/MM48.

This was once a peaceful and picturesque little village that has slowly been eroded and destroyed by greedy and thoughtless developers.
I have lived in Send for 20 years and it is sickening and sad to see it being over developed
So I strongly object to the plans to specified above

Attached documents:

**Comment:** MM42 - LPMM18/212  **Respondent:** Thomas Gibbs 20566945  **Agent:**

Not to mention all the other prospered plan such as MM44 & MM41/MM9/MM42/MM48
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Attached documents:

**Comment:** MM44 - LPMM18/209  **Respondent:** Thomas Gibbs 20566945  **Agent:**

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So I strongly object to the plans to specified above

Attached documents:

**Comment:** MM48 - LPMM18/213  **Respondent:** Thomas Gibbs 20566945  **Agent:**

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<th>Comment</th>
<th>MM27 - LPMM18/237</th>
<th>Respondent: Miss E Frankland 20569633</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM9 Green Belt policy and MM27 MM42 MM48 Transport Strategy</td>
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<td>The Green Belt should be protected and preserved for future generations. Wild life and walkers alike need our greenbelt areas and over development of our villages devastating the rurality of the area. I do not wish to live in a town, choked by increased volume of traffic with reduced places to enjoy nature, peace and a walk with my family and dogs.</td>
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Attached documents:
MM9 Green Belt policy and MM27 MM42 MM48 Transport Strategy

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Attached documents:

Comment: MM41 - LPMM18/253  Respondent: Neil Frankland 20576257  Agent:

As relatively new resident to Send having moved from West Byfleet due to over development, I wish to strongly object to the following:

MM41 Land at Garlicks Arch, Send Marsh

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Attached documents:

Comment: MM42 - LPMM18/254  Respondent: Neil Frankland 20576257  Agent:

MM42 Land at Burnt Common, London Road, Send

This development seems to me unnecessary considering there is unused capacity at Slyfield. It is again Green Belt land and would put unnecessary strain on the local roads.

Attached documents:

Comment: MM42 - LPMM18/258  Respondent: Neil Frankland 20576257  Agent:

MM9 Green Belt policy and MM27 MM42 MM48 Transport Strategy

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Attached documents:

Comment: MM44 - LPMM18/255  Respondent: Neil Frankland 20576257  Agent:
MM44 Land at Alderton’s Farm, Send Marsh Road

Send is a village and should remain one. Another Green Belt site with no special circumstances therefore contradicting policy MM9. The additional traffic will increase the pressure on local roads and it will detract from the heritage buildings at Send Marsh Green.

Attached documents:

Comment: MM48 - LPMM18/259  Respondent: Neil Frankland 20576257  Agent:

MM9 Green Belt policy and MM27 MM42 MM48 Transport Strategy

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Attached documents:

Comment: MM9 - LPMM18/256  Respondent: Neil Frankland 20576257  Agent:

MM9 Green Belt policy and MM27 MM42 MM48 Transport Strategy

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Attached documents:

Comment: MM27 - LPMM18/297  Respondent: Linda Boardman 20579745  Agent:


It is obvious that with the above policies & strategies are still reflecting directly from what has gone before; amending & increasing on the Local Planning Foot Print. These changes are shown in shaving bits off here and adding bits to there.

These amendments:

Still disregards all technical impacts on current & future structures. Most structures sit on a deep clay base which needs speculated ground water to function as a foundation base.

Tweaking weak infrastructures, no way puts in place any future proofed infrastructures.

Increasing these capacities will greatly increase all impacts on enviroment. Not all of which is yet to be fully understood or been considered.
Concreting over "Green Belt" is just not on, now or anytime in the future. We all complain about the forests in South America being cut down, along with plastic waste; this is no different.

The impact of such large developments, will swamp Send & all surrounding areas. If Wisley was a no no; then these proposals are doubly bad.

So what part of NO, does the current dominant political power not understand?

It seems as if the first judgement, common sense (Wisley) went against the current political-monied power houses. How strange that with a new judge conforms now to their wishes. How did all this happen?

Stop faffing about! Ask the local populous "What they want to happen by holding a Local Referendum." Just like Switzerland.

Attached documents:

Comment: MM41 - LPMM18/294  Respondent: Linda Boardman 20579745  Agent:


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Attached documents:

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**Comment:** MM9 - LPMM18/296  **Respondent:** Linda Boardman 20579745  **Agent:**


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Attached documents:
Comment: MM27 - LPMM18/364  Respondent: Donna Carley 20583841  Agent:

**MM27, MM41, MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/361  Respondent: Donna Carley 20583841  Agent:

Object to the following:

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

The increase from 400 to 550 homes of which 450 to be built in the first five years

- It is Green Belt containing ancient woodland
- An increase of 37% in the number of houses proposed is excessive
- 7000 ejections to the previous lower number have been ignored
- It will join up Send and Ripley and constitute over development
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads
- School and medical facilities will be strained to breaking point

Attached documents:

Comment: MM42 - LPMM18/362  Respondent: Donna Carley 20583841  Agent:

**MM27, MM41, MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to the nearby Golden Hill and Wisley / Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Attached documents:

Comment: MM42 - LPMM18/365  Respondent: Donna Carley 20583841  Agent:

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The increase from 7000 to a minimum of 14,800 sq m of industrial and storage is excessive
• Since being deleted from the 2014 plan this has been increased twice, doubling the area
• It is by far the largest new industrial allocation in any village in the borough
• There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9.
• The Employment Land Needs Assessment showed a reduction in demand for industrial land.
• This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand.
• Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerously high.

Attached documents:

Comment: MM42 - LPMM18/366  Respondent: Donna Carley 20583841  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM48 - LPMM18/367  Respondent: Donna Carley 20583841  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM9 - LPMM18/363  Respondent: Donna Carley 20583841  Agent:

MM9 Green Belt Policy

Although the ‘modifications’ claim to protect the Green Belt except in very special circumstances GBC make an exception for ‘limited infilling outside of the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village’. This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of the residents and the environment.

Attached documents:
Comment: Other comments - LPMM18/368  Respondent: Donna Carley 20583841  Agent:

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 Houses at Clockbarn in Tannery Land and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM45 - LPMM18/393  Respondent: Nick Sargent 20587137  Agent:

I am disappointed by the inclusion of site A64 (Normandy) into the latest version of the draft local plan. The reason I object to the development of this site is;

1. No exceptional circumstances have been provided as to why the green belt boundary should be redrawn in Normandy.
2. Several previous applications on this land have been refused.
3. The current sewage systems are already overloaded and this would make it worse.
4. Access to this site is dangerous due its close proximity to the railway bridge.
5. It will potentially damage views of the Surrey Hills (AONB).
6. This site is also prone to surface water flooding and is a natural run off for the surrounding area.
7. The local community has not been consulted on what development they would like in the area.
8. This site sets a potentially dangerous precedent for green belt development.

Attached documents:

Comment: MM27 - LPMM18/407  Respondent: Mrs Lesley Peed 20589281  Agent:

MM27 - The traffic impact on Send of the planned developments for Clockbarn in Tannery Lane, Garlick’s Arch, Burnt Common and Alderton’s Farm would be completely unacceptable. Local roads are already choked with traffic and the ensuing pollution levels and delays. These concerns have not been adequately addressed. The traffic impact on Send of the planned developments for Clockbarn in Tannery Lane, Garlick’s Arch, Burnt Common and Alderton’s Farm would be completely unacceptable. Local roads are already choked with traffic and the ensuing pollution levels and delays. These concerns have not been adequately addressed.

Attached documents:

Comment: MM27 - LPMM18/409  Respondent: Mrs Lesley Peed 20589281  Agent:
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Attached documents:

Comment: MM41 - LPMM18/408  Respondent: Mrs Lesley Peed 20589281  Agent:

MM41 This is Green Belt land containing ancient woodland. Its destruction is irretrievable and it will not be there for future generations to enjoy. Ripley and Send are, and always have been two distinct villages with their individual character. This development will join them together. The infrastructure of the villages in terms of school and medical facilities will not cope with the planned 550 homes and an extra around 800 cars will clog already congested roads. The traffic impact on Send of the planned developments for Clockbarn in Tannery Lane, Garlick’s Arch, Burnt Common and Alderton’s Farm would be completely unacceptable. Local roads are already choked with traffic and the ensuing pollution levels and delays. These concerns have not been adequately addressed.

Attached documents:

Comment: MM42 - LPMM18/405  Respondent: Mrs Lesley Peed 20589281  Agent:

MM42 Putting further industrial sites in the Green Belt contradicts MM9. As a resident of Send, I am very concerned by the proposal to put a minimum of 14,800 sq m of industrial and storage facilities and Burnt Common. Slyfield has unused capacity and the Employment Land Needs Assessment shows a reduction in demand for industrial land. This proposal would be on top of the 25% increase in Send Business Centre, giving Send a much larger concentration of industrial square footage than any other village. There is no proven demand for this.

Attached documents:

Comment: MM44 - LPMM18/404  Respondent: Mrs Lesley Peed 20589281  Agent:

MM44 This is Green Belt land. The increase in traffic that this development will bring will cause unacceptable pressure on Send Cross Roads. 770 houses will be added across the planned developments at Garlick’s Arch, Clockbarn and Winds Ridge to a village which currently has 1700. The infrastructure of Send, given its nature as a village, will not be able to cope.

Attached documents:

Comment: MM9 - LPMM18/406  Respondent: Mrs Lesley Peed 20589281  Agent:

MM9 The Green Belt protection is being put at risk by GBC policy. Uncertainty has been introduced when GBC says it will make an exception for ‘limited infilling outside the identified settlement boundaries where it can be demonstrated
that the site should be considered to be within the village’. Land on the edge of the village could be taken for development by speculators, adding further pressure to an already stretched infrastructure and further destroying the village feel of the area.

Attached documents:

Comment: MM43 - LPMM18/5764  Respondent: Mrs Patricia Allen 20596225  Agent:

Consultation on Modification MM43 to the new Local Plan

Policy A62: Hornhatch Farm, land adjoining New Road, Chilworth – proposed early housing development of 80 new homes

I wish to object to this proposal as being unsustainable for the following reasons:

- It would require very strong justification to go ahead with this proposal as recent figures from the Office of National Statistics are showing that the predicted Guildford Borough housing needs will be far below the Borough Council’s proposed housing targets used to prepare the new Local Plan
- This development would have significant impact on views from the surrounding AONB
- The site is currently in the Green Belt and outside the settlement area and should remain so to keep the land permanently open to protect the AONB/AGLV, prevent urban sprawl and further linear development, and protect the nearby wild life corridors
- Brownfield sites in the Borough should be used instead of agricultural fields in the Green Belt surrounded by the AONB, even if this means a slightly longer delivery period
- The site is near a bend and right next to the very busy road junction of the A248 and B2128 which already has traffic issues with long delays and tail backs at peak times
- This development will create a large number of extra motor vehicle movements per day and put even more pressure on the junction and New Road
- This site lacks an ideal access point for easy and safe exit and entrance particularly at peak times
- Over 40 new homes have already been built in Chilworth recently as infilling and this has meant more traffic on the A248 and reduced parking areas due to entrances to the new development sites, all of which has made it difficult to drive through the village. This development would only add to the problems.
- A gas pipeline across the land could mean significant physical constraints to the development and could reduce delivery time
- There is poor public transport due to limited train and even more limited bus services, and Chilworth train station has no parking and is just over a mile away. Shalford Station also has a limited train service and parking in Shalford is a serious problem. It makes no sense to build where the public transport is poor and people will be reliant on their cars. This is not sustainable development.
- If it does go ahead, I think the number of houses should be significantly reduced; there needs to be good screening and planting to reduce the visual impact; a round-about at Rice’s Corner would be required; there should be some rental housing included in the development as well as affordable housing

Attached documents:

Comment: MM27 - LPMM18/426  Respondent: Mr Alex Beames 20602977  Agent:

As per this MM27, since the scheme has been delayed, why have you increased the number of dwellings and square meterage of MM41, MM42 and MM44? This contradicts your own policy does it not?
Comment: MM41 - LPMM18/423  Respondent: Mr Alex Beames 20602977  Agent:

The increase from the present number of dwellings is far in excess of that which is reasonable. It will seriously detract from the character of the area and will unreasonably increase traffic. The area is Green Belt and contains ancient woodlands, will most likely fill the present 'gap' between Send and Ripley, thus making them impossible to differentiate. The existing social infrastructure, doctors, schools, shops and so forth will not be able to cope with such an increase in demand. I am surprised that a figure above 100 dwellings has even been suggested for this site due to the absolute knowledge that all new properties are not adequately served by public transport and the absolute reliance on personal vehicles as a form of transportation.

Comment: MM42 - LPMM18/424  Respondent: Mr Alex Beames 20602977  Agent:

I would propose that the already high Nitrogen dioxide levels will exceed permitted levels should this development take place. There is little to no consideration for anyone not able-bodied enough to walk or cycle in terms of transport and again displays a lack of thought in terms of how people will get to work there, let alone the further additional goods vehicle traffic through the villages of Ripley, Send and West Clandon. The A247 is only just wide enough for 2 cars to pass each other through parts of East Clandon, yet sees articulated vehicles regularly, surely you cannot be suggesting you wish to increase this? There is a major safety concern when the only way to pass is to mount a footpath and wait. East Clandon does not need it's road widening, there are parts that you couldn't even if you wanted to. What it needs is sensible planning when it comes to new traffic generation, this is not it.

Comment: MM44 - LPMM18/425  Respondent: Mr Alex Beames 20602977  Agent:

With respect to MM41, should that atrocity of a proposal be accepted in full (550 homes) then this is not acceptable in the slightest. Your proposals would look to increase residence by over 40% in the village, that is insanity. The current infrastructure will not cope with it. Air Quality and Environmental issues with the amount of building you are proposing to allow should have set alarm bells ringing way before this got to print.

Send has terrible public transport links, there is a limited bus service, it is 2 miles to the nearest train station on unlit roads with poor pedestrian footpaths (not continuous and therefore you are forcing people to cross a 40 MPH road that is often liable to speeding, possibly in the dark) and no cycle paths - further in fact from this location shown. You need to improve this greatly before considering any further development in the area. Assuming an aggregate of 1.5 cars per household, you intend with these proposals to add 1000 vehicle movements at each end of the day to an area which simply is not designed for it, can not cope with it and will likely suffer for it. This shows a tremendous lack of foresight.
Comment: MM45 - LPMM18/427  Respondent: Mrs Elaine Sibley 20603265  Agent:

Why would Guildford Borough consider building 105 houses in an area that has no existing facilities and already is suffering from increased traffic and pressure on local health services? In addition, the road and sewage systems in Normandy and Flexford are already overloaded and building yet more houses would make matters a lot worse. Guildford Borough Council has also not explained clearly what ‘exceptional circumstances’ are needed to redraw the Green Belt boundary around Normandy. It seems to local people that this proposed planning application would lead to the urbanisation of our community and place long term strain on it without any benefit.

Attached documents:

Comment: MM45 - LPMM18/455  Respondent: Mrs Elizabeth Owver 20605793  Agent:

Area A64. Glaziers Lane. 105 Houses.

I am writing to object to the plan to build 105 houses on A64 in Glaziers Lane, Normandy. This is the third, and biggest, application to build on this site. The last 2 smaller developments were turned down and nothing has changed.

Green Belt

This is valuable green belt land dividing the settlements of Normandy and Flexford. I see no exceptional circumstances which make it necessary to sacrifice green belt for housing.

A64 was not in the local plan at all until recently but has been added later. There are brownfield sites which should be used for housing. I understand it may cost more to develop brownfield sites but brownfield areas need to be used sometime and must be cleaned up sooner or later. Councils need to bite the bullet and do it now. People can then live where they work + not see abandoned land in towns going wild + being neglected. Our green belt is *priceless* and once it has been built on and violated it is lost forever.

Enviroment + Flooding

A64 is not suited for building. It is good grazing land but remains waterlogged throughout the winter with a high [unreadable text], as illustrated by the lake which is full, even after an exceptionally dry summer.

Flooding + surface water drainage are by [unreadable text] in Normandy (ref. Flood Forum minutes for the last few years). A64 is a valuable "sponge" holdup water + preventing harmful run-off + problems elsewhere.

Traffic

Glaziers Lane is a D-road + not designated a Lane for nothing. Access from 100 houses onto the Lane would be a nightmare. One of the reasons planning was refused before. They will all have cars, an essential in an isolated village for school, shopping and work. Just because it is near a railway station people still need a car.

Infrastructure

As a D-road there are lots of parts of the Lane needing repair, a bumpy bridge, subsidence at the North end. We have waited 3 years for the repair of a collapsed drain outside our house - it took 3 men 4 days - and at last surface water is not spreading into gardens. The men doing it said it was a result of heavy traffic. This shows our infrastructure is struggling now and cannot take anymore strain. The sewage system to the north of us also fails to cope at times, so it too cannot take any more.

Please, hands off our Greenbelt.
Comment: MM2 - LPMM18/456  Respondent: Chris Blow 20605953  Agent:

MM2 – the very recent data from the Office of National Statistics on projected household formation show significant change and provide a clear indication that the Guildford housing requirement should be lowered. I suggest that the Inspector must re-open the Examination of the Local Plan in public to examine this new data and take further advice from the experts.

MM2 – in view of the many critical comments about the required provision of new homes to meet Woking’s unmet need and since Guildford are experiencing exactly the same Green Belt constraints as Woking, it is argued that the figure of 42 new homes per year to meet Woking’s unmet need should be significantly reduced, and, if possible, eliminated completely. This view is reinforced by the further observation that Woking’s unmet need is itself likely/undoubtedly overstated following their latest ONS household formation data reduction.

Attached documents:

Comment: MM44 - LPMM18/461  Respondent: Miss Karen O'Sullivan 20606593  Agent:

This will be catastrophic for Send if this goes ahead. Why so many developments for such a small village? Send will no longer be a village but just another urbanised town with no green belt left. How many trees will have to be felled to make way for all these developments? Traffic will become so congested. It will leave Send with MORE traffic jams, MORE air pollution and MORE road surface damage. Facilities will be stretched to a maximum. With all these developments, will you be building extra schools, surgeries and shops to accommodate this?

NO NO NO to these developments!!

SAVE OUR VILLAGE

THINK OF OUR FUTURE

Attached documents:

Comment: MM44 - LPMM18/462  Respondent: Miss Daniela Genco 20606657  Agent:

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SAVE OUR VILLAGE

THINK OF OUR FUTURE

Our response to the proposals is that we submitted our response in the original plan Guildford, Merrow, Burpham, Send, Ripley, West Clandon, West Horsley, Wisley Airfield. There is no infrastructure to support any of these proposed developments on Green Belt Land. There is no justification for taking land out of the Green Belt in order that it can be built on when there are many brownfield sites that can be used. We do not have the time to go through page after page of these proposed alterations to the plan.

The traffic through all of these areas is already more than can be coped with and we have not seen any proposals that would prevent this being an overflow from London. Which is exactly what the developers at Wisley told us when we went to view their first proposal for development. The people in the villages have a right to quality of life, free from pollution and noise generated by traffic.

The National Statistics Office have clearly stated that you have overestimated the housing requirement for this area and they do not expect it to change. They have slashed their forecasts for population growth in the borough by 40%

September 20th 2018, that the figure would be 4,662. This means the housing requirements could be met on existing brownfield sites within the town.

There is no reason that is acceptable that Guildford and the surrounding villages should meet Woking's unmet housing needs when Woking has ignored their residents' needs.

We therefore hope that without spending a great deal of tax payers money this housing assessment will be reviewed and that priority will be given to the quality of life for residents and wildlife conservation.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/584</th>
<th>Respondent: Mrs Kathy Mylet 20610209</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>An increase of nearly 40% in the proposed number of houses is ridiculous.</td>
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<tr>
<td>Garlicks Arch contains ancient woodland and is classed as Green Belt. This development would lead to Ripley and Send being overdeveloped. The knock on effect would be an increase of approximately 1000 cars on the local roads, insufficient doctors at the local Medical Centre and now that Ripley School has closed, not enough places at Send Primary School for the additional children that would want to go there.</td>
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<th>Respondent: Mrs Kathy Mylet 20610209</th>
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<tr>
<td>Narrow surrounding roads will become gridlocked leading to an increase in Nitrogen dioxide levels which are already very high. This site is by far the biggest new industrial site in any village in the borough. Slyfield has unused capacity so should be used first. Combined with the 25% increase at Send Business Centre means that Send will have a much bigger industrial concentration than any other village in the borough.</td>
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<tr>
<td>The additional traffic generated by building these houses, will put more pressure on Send Crossroads. With Garlick's Arch, Clockbarn, Winds Ridge it will add nearly 800 houses to the 1700 houses currently in Send, an increase of nearly 50%. This would put a huge strain on the current infrastructure.</td>
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<th>Respondent: Mrs Kathy Mylet 20610209</th>
<th>Agent:</th>
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<td>Excessive development makes a mockery of the Green Belt Protection.</td>
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<tr>
<th>Comment: MM41 - LPMM18/597</th>
<th>Respondent: Mr Thomas Tuck 20615617</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I wish to register my objections to the increased number of houses proposed to be built on this site.</td>
<td></td>
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<tr>
<td>In spite off my earlier objections regarding housing adjacent to a six lane highway, you now see fit to increase further those persons who shall be effected by the known dangers to children’s health from noxious fumes.</td>
<td></td>
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</tr>
</tbody>
</table>
Respondent: Mrs Anne-Marie Rosoman 20621153
Agent:

The land proposed to be removed from the Green Belt provides a contrast to the surrounding housing. Development will be damaging in both ecological and environmental terms. The traffic generated will put further strain on the roads around Godalming, which are already too busy. The infrastructure just won't be able to cope.

Attached documents:

Comment: MM39 - LPMM18/606  Respondent: Andrew Baker 20622593  Agent:

I write with reference to the local plan and the current proposal to construct 460 homes under reference A61. We have attended a meeting about the proposal in the past.

It is clear to me that the infrastructure plan is inadequate in most respects. Sufficient provision has not been included for the infrastructure components that are necessary for such a large development in such a rural location.

The traffic implications for Eashing Lane and elsewhere are alarming and have not been properly considered or provided for.

There would, of course, be a significant number of school children and students. The requirement for school and college places appears to have been largely ignored and so also has the need for other essential local services, such as health and social service requirements.

The proposals, as they stand, would place a huge new burden and an extremely negative effect on the rural spaces South of Godalming. They are ill-thought out and would result in a further serious deterioration of the local environment. They require substantial amendment.

Attached documents:

Comment: MM41 - LPMM18/643  Respondent: Jane Harris 20622881  Agent:

I would like to object to the large increase in the number of houses proposed in the Send area. Please find below my reasons for objection:

**MM41**

An increase in the number of houses of 37%

Despite a large number of objection to the previous lower number this has been completely ignored.

It is green belt containing ancient woodland.

It will mean that the distinction between Send and Ripley will be lost.
The site has a known history of flooding.

A large number of extra cars will add to the already congested local roads.

With the closure of Ripley school where will all the extra children go as Send school is already full?

It is difficult to get an appointment at the Send Surgery so where will all the extra residents go for medical treatment?

Attached documents:

**Comment: MM42 - LPMM18/644  Respondent: Jane Harris 20622881   Agent:**

**MM42**

Having already been deleted from the 2014 plan this has increased twice doubling the size of the area.

The size of this industrial development is far too large for a small village.

Why not put in Slyfield which has unused capacity rather than in green belt.

Where is the demand for this industrial development?

Already gridlocked local roads will become unuseable.

Attached documents:

**Comment: MM44 - LPMM18/645  Respondent: Jane Harris 20622881   Agent:**

**MM44**

Why has this been reinserted after being removed earlier due to local objections?

This is green belt with no special circumstances so contradicts policy MM9.

This will only add to the already heavy traffic using Send crossroads.

With the other developments this adds 770 houses to the 1700 currently in Send a 45% increase!!

Attached documents:

**Comment: MM27 - LPMM18/650  Respondent: Cam Pulham 20622913   Agent:**

MM27, MM41, MM42 and MM48
This strategy, although considering the access onto the A3, does not consider the impact on local roads. As it is, these roads are already heavily congested and leads to poor air quality for residents. The slips roads may well be an improvement, but it is not offset by the proposed changes listed elsewhere.

These roads are not policed for speed and residents are already subjected to high noise levels through speeding traffic and high speed motorcycles. The congestion may also lead to an increase in accidents and a further slowing down to the response time of emergency vehicles.

**Attached documents:**

**Comment:** MM41 - LPMM18/646  **Respondent:** Cam Pulham 20622913  **Agent:**

I am writing to comment on and object to the modifications to the local plan as follows.

MM41

An excessive increase in the number of houses in the area is unsustainable with local resources and despite previous objections, this is still being considered. It will lead to the villages of Send and Ripley having their own identities and will become merged. One of the attractions is the woodland, and the effect of the removal of some of this may lead to localised flooding. In addition to this, the already overloaded roads in the area will become even more gridlocked at peak times. The schools and doctors surgery are already at capacity and the increase in restricted road blockages will be caused by the transportation of children to and from school.

**Attached documents:**

**Comment:** MM41 - LPMM18/651  **Respondent:** Cam Pulham 20622913  **Agent:**

MM27, MM41, MM42 and MM48

This strategy, although considering the access onto the A3, does not consider the impact on local roads. As it is, these roads are already heavily congested and leads to poor air quality for residents. The slips roads may well be an improvement, but it is not offset by the proposed changes listed elsewhere.

These roads are not policed for speed and residents are already subjected to high noise levels through speeding traffic and high speed motorcycles. The congestion may also lead to an increase in accidents and a further slowing down to the response time of emergency vehicles.

**Attached documents:**

**Comment:** MM42 - LPMM18/647  **Respondent:** Cam Pulham 20622913  **Agent:**

MM42

The doubling of the proposed industrial development at Burnt Common is yet to be a proven need especially as it is in a green belt area. We already have Slyfield, which has unused areas past the existing car dealerships that could be used as a
better option. It would seem that the advertising for industrial units has shown that there is still current spare capacity. There is already a disproportionate level of commercial traffic in the Send Area due to the development at the Send Business centre which in itself is proposed to be expanded.

The access roads in the area are already restrictive in terms of width and would suffer with any further development.

Attached documents:

Comment: MM42 - LPMM18/652  Respondent: Cam Pulham 20622913  Agent:

MM27, MM41, MM42 and MM48

This strategy, although considering the access onto the A3, does not consider the impact on local roads. As it is, these roads are already heavily congested and leads to poor air quality for residents. The slips roads may well be an improvement, but it is not offset by the proposed changes listed elsewhere.

These roads are not policed for speed and residents are already subjected to high noise levels through speeding traffic and high speed motorcycles. The congestion may also lead to an increase in accidents and a further slowing down to the response time of emergency vehicles.

Attached documents:

Comment: MM44 - LPMM18/648  Respondent: Cam Pulham 20622913  Agent:

MM44

As before, the main impact would be on the traffic levels and the overloading of local amenities and resources which are already at capacity. It will be out of character for the area, especially with the extension to the use of self build plots which will introduce a level of out of character houses and diversity of structure.

This will lead to traffic build up at the crossroads in Send which are already overloaded at peak times and will further increase the air pollution in the area. The infrastructure will not allow for the massive increase in housing in the area.

Attached documents:

Comment: MM48 - LPMM18/653  Respondent: Cam Pulham 20622913  Agent:

MM27, MM41, MM42 and MM48

This strategy, although considering the access onto the A3, does not consider the impact on local roads. As it is, these roads are already heavily congested and leads to poor air quality for residents. The slips roads may well be an improvement, but it is not offset by the proposed changes listed elsewhere.
These roads are not policed for speed and residents are already subjected to high noise levels through speeding traffic and high speed motorcycles. The congestion may also lead to an increase in accidents and a further slowing down to the response time of emergency vehicles.

These are my objections to the plans which I hope will be documented.

Attached documents:

Comment: MM9 - LPMM18/649  Respondent: Cam Pulham 20622913  Agent:

MM9

There is no evidence that this proposed change will have any positive effect on preserving the green belt status and will lead to the loss of identity of the villages.

Attached documents:

Comment: MM27 - LPMM18/662  Respondent: Elsa Pulham 20623329  Agent:

MM27, MM41, MM42, MM48

The planned road strategy, which allows for more and safer access onto the A3, will only serve to cause more congestion on local roads which are already overloaded at peak times. As these roads are rarely policed, this already leads to speeding and pollution to local residents.

Attached documents:

Comment: MM41 - LPMM18/658  Respondent: Elsa Pulham 20623329  Agent:

With regards to the proposed plans, I am writing to oppose these on the following grounds.

MM41

The local amenities will not accommodate this increase in housing as well as the impact on local traffic. This will lead to gridlock on local roads as well as an increased risk of flooding by the loss of woodland. There would also be no real distinction between the villages of Send and Ripley, causing a loss of identity.

Attached documents:

Comment: MM41 - LPMM18/663  Respondent: Elsa Pulham 20623329  Agent:
MM27, MM41, MM42, MM48

The planned road strategy, which allows for more and safer access onto the A3, will only serve to cause more congestion on local roads which are already overloaded at peak times. As these roads are rarely policed, this already leads to speeding and pollution to local residents.

Attached documents:

Comment: MM42 - LPMM18/659  Respondent: Elsa Pulham 20623329  Agent:

Sly field has sufficient capacity to absorb this in an already commercial area and should be used instead of in a rural area where the roads will suffer. This is especially true of the Send Business Centre where the local roads are already overused and unsuitable.

Attached documents:

Comment: MM42 - LPMM18/664  Respondent: Elsa Pulham 20623329  Agent:

MM27, MM41, MM42, MM48

The planned road strategy, which allows for more and safer access onto the A3, will only serve to cause more congestion on local roads which are already overloaded at peak times. As these roads are rarely policed, this already leads to speeding and pollution to local residents.

Attached documents:

Comment: MM44 - LPMM18/660  Respondent: Elsa Pulham 20623329  Agent:

MM44

The increase in traffic is disproportionate to the area. The houses will no doubt be out of character and will result in traffic backlogs at pinch points such as Send crossroads, leading to poorer air quality, noise and delays to local residents.

Attached documents:

Comment: MM48 - LPMM18/665  Respondent: Elsa Pulham 20623329  Agent:

MM27, MM41, MM42, MM48
The planned road strategy, which allows for more and safer access onto the A3, will only serve to cause more congestion on local roads which are already overloaded at peak times. As these roads are rarely policed, this already leads to speeding and pollution to local residents.

These are my objections to the current modification to the plan

**Attached documents:**

**Comment:** MM9 - LPMM18/661  **Respondent:** Elsa Pulham 20623329  **Agent:**

MM9

I am unclear as how this impacts the green belt status and consider it to be detrimental to the area

**Attached documents:**

**Comment:** MM45 - LPMM18/667  **Respondent:** Bryan Starkey 20624065  **Agent:**

I wish to register my objection to the above which relates to the proposed development of 105 dwellings North of the railway line to the East of Glaziers Lane, Normandy.

My reasons are as follows:

1. No exceptional circumstances have been cited for removing the area from the Green Belt - or building on Green Belt land. Indeed, previous planning applications for smaller developments on the site have been rejected on the grounds that the area makes an important contribution to the openness of the Green Belt.

2. Such a development would increase the population of Normandy significantly, increasing the load on local infrastructure - roads, sewerage and drainage, schools, healthcare etc. There appears to be no mention of the need - and expenditure required - to improve the infrastructure to cope with the proposed new development.

**Attached documents:**

**Comment:** MM39 - LPMM18/668  **Respondent:** Heather and Stephen Wahl 20624353  **Agent:**

We should like to register our objection to the change to the Local Plan which will take land to the north of Aarons Hill out of the green belt and with the pending application for 200 houses. This is land which neighbours Waverley Borough Land. The access roads are inadequate for this size of development. There appears to be no consideration of further problems with the infrastructure of services especially the supply of water, electricity and gas or waste.

It is of interest to note that the increased impact of this population will not be beneficial to Guildford but will be detrimental to Waverley. The local schools are Waverley ones. What contribution will be made to these services?

This area has bridleways and public footpaths which are used regularly. At the top of a hill, bordering ANOBs and will detract from the enjoyment of the area by the public.
To the planning application committee:

I wish to submit my objection to the proposed development of land in Aarons Hill, 16116, the proposal to take the land out of the green belt.

My objections are:

There will be parking, access and turning issues along Eashing Lane, which is the main access road to development.

There will be increased noise in the residential area.

There will be a threat to wildlife, including a rare species of bat which lives in the proposed area.

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Please see below my objections to the main modifications:

An increase of 37% in the number of houses proposed is excessive

7000 objections to the previous lower number have been ignored

It is Green Belt containing ancient woodland

It will join up Send and Ripley and constitute over development

The site is subject to frequent flooding and contaminated by lead shot
The East Clandon Stream which runs through the site is shown as a high-risk flood area by the Environment Agency and any development on the site will increase water run-off endangering properties downstream in Send Marsh which are already at risk

At least 800 extra cars will block up the adjacent roads

School and medical facilities will be strained to breaking-point

With Alderton’s (120), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure

**Attached documents:**

---

**Comment: MM41 - LPMM18/675  Respondent: Stephen Harnor 20624417  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

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**Comment: MM42 - LPMM18/671  Respondent: Stephen Harnor 20624417  Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

Since being deleted from the 2014 plan this has been increased twice, doubling the area

It is by far the largest new industrial allocation in any village in the borough

There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9

The Employment Land Needs Assessment showed a reduction in demand for industrial land

This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand

Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

**Attached documents:**

---

**Comment: MM42 - LPMM18/676  Respondent: Stephen Harnor 20624417  Agent:**
The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

**Comment:** MM44 - LPMM18/672  **Respondent:** Stephen Harnor 20624417  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road, Policy A63**

This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July. It is a Green belt site with no special circumstances so it contradicts policy MM9.

It will detract from the heritage buildings at Send Marsh Green.

The additional traffic will increase pressure at the Send Crossroads and the already congested junction of Send Marsh Road and Portsmouth Road.

With Garlick’s Arch (550), Clockbarn (60), Winds Ridge (40), it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

**Attached documents:**

**Comment:** MM48 - LPMM18/677  **Respondent:** Stephen Harnor 20624417  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking and the A3 every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

**Comment:** MM9 - LPMM18/673  **Respondent:** Stephen Harnor 20624417  **Agent:**

**MM9 Green Belt Policy**

Although the “modification” claim to protect the Green Belt except in very special circumstances, GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This introduces a subjective test, considerable uncertainty and effectively
negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM39 - LPMM18/680  Respondent: Paul Tite 20624641  Agent:

I wish to object to the above proposal for the above land to be taken out of the Green Belt for its use as housing. Together with the adjoining land which has a planning application for 262 no houses, a development of this size is most unsuitable for its location. The reasons are numerous, but can be summarised as follows:-

Eashing Lane is narrow with tight bends, much of it without footpaths.

Towards the A3, the bridge at Eashing is single lane and has a weight limit which makes it totally unsuitable for heavy goods vehicles, plant movements etc, let alone the extra traffic that would be generated by new residents. At times, customers using The Stag use the road as an overflow car park right up to the traffic lights for the bridge which can cause problems for traffic heading towards the A3. Towards Godalming there are often long tailbacks getting on to the A3100 towards Godalming, especially if traffic is waiting to turn right towards Milford. Residents of Eashing Lane have to park on the road, thus making it too narrow for two large vehicles to pass each other.

The proposed development is home to several rare and threatened species which use the proposed site for feeding and breeding, and is close to ancient woodland. For example, I am informed that it is home to Barbastelle bats which are protected in the UK under the wildlife and countryside act 1981, and are a Priority Species under the UK Post-2010 Biodiversity Framework.

Building on Green Belt land will reduce habitat and food sources for wildlife. It will also increase pollution, affect climate change and increase the risk of flooding etc, and is a loss of valuable farming land. It will ruin the landscape for future generations and wildlife, and will change the character of Godalming.

Together with the extra traffic generated on the local roads, it is already difficult to obtain appointments for doctors, dentists etc, and this development would make the problem worse.

I strongly request that this land is not taken out of the Green Belt and is not used for housing.

Attached documents:

Comment: MM42 - LPMM18/692  Respondent: Mr and Mrs Joyce 20625505  Agent:

To the planning decision makers

Really!!!!

There is truly no need to increase industrial/storage facilities in our local vicinity.

In and around Surrey there so many units standing empty many of those more closely located nearer to transport links for workers employed by such companies that would likely inhabit such facilities.

Attached documents:
Comment: MM39 - LPMM18/694  Respondent: Jennifer Isaacs 20625569  Agent:

As a long time resident in Guildford Borough, for well over 50 years, I strongly object to the proposed urbanization of historic Green Belt and Area of Great Landscape Value in order to provide mainly market housing on this site in open countryside. The Inspector’s decision to incorporate this site within Godalming Is opposed by Godalming Town Council whose views should carry more weight than Waverley or Guildford. Guildford cannot justify a decision to reverse its earlier public stance that this site was not suitable for development.

There was wholly inadequate consultation by Waverley regarding this site which was not recommended for development in the Green Belt review. The population in both Waverley and Guildford local to the site is I believe almost wholly opposed to this development apart from those who have a commercial interest.

The site is served by a single public country road and cannot possibly support traffic which will be generated by the site. No theoretical calculation of traffic use can justify a result which will support a conclusion that this is a sustainable site. The decision by Waverley resulted from a questionable decision by the Inspector to require increased housing in Waverley’s OAN failing which he would find Waverley’s Local Plan unsound. Guildford’s Plan does not require the houses at Aaron’s Hill to meet its OAN.

I tried to submit this objection on line but the algorithm you use prevents me from registering as my husband is already registered. The website is very difficult to navigate and there is no clear means of reaching the get involved part of the site.

Attached documents:

Comment: MM41 - LPMM18/696  Respondent: Alastair Graham 20625825  Agent:

I wish to strongly object to the following excessive developments which are planned for Send:

MM41 Garlicks Arch

The building of 400 new houses at Garlick’s Arch, Send March, is an unacceptable intrusion on Green Belt land and yet you are now proposing to increase the number of houses to 550 which makes the Green Belt invasion even worse. This will effectively join up Send and Ripley which comprises over-development resulting in urban sprawl and a massive increase in cars on already over-stretched roads in the neighbourhood, particularly the Portsmouth Road through Ripley to the A3.

Attached documents:

Comment: MM42 - LPMM18/697  Respondent: Alastair Graham 20625825  Agent:

MM42 Burnt Common

The proposal to increase the land at Burnt Common, London Road, Send from 7,000 to 14,800 sq.m. of industrial and storage space is an excessively large burden of industrial space for the village of Send to have to bear. There is no evidence of the need to such a large area of industrial space in Send, and if the UK leaves the EU as a result of Brexit, demand for industrial space is actually likely to fall very significantly due to the reduction in the UK’s exports to Britain’s largest market, the EU. Therefore the allocation of even 7,000 sq ft of industrial space to Send should be
reduced, not increased to 14,800 sq.ft. The village does not need additional employment opportunities, it also does not need the increase in pollution from heavy goods vehicles, it does not need increased traffic congestion.

Attached documents:

Comment: MM44 - LPMM18/698  Respondent: Alastair Graham 20625825  Agent:

MM44 Aldertons Farm

The proposed building of 120 new houses at Alderton’s Farm is a further invasion of Green Belt land of a rural and peaceful character. The proposed development is far too close to the ancient houses of 16th and 17th century historical interest at Send Green, and will result in yet more traffic congestion in Ripley and vibration damage to this village’s heritage buildings in the rush hours as commuters access the AS Northbound. It will mean at least 150 additional cars clogging the narrow Send Marsh Road, including at the crossroads at the junction of Send Marsh Road and Send Barnes Lane at one end of Send Marsh Road, as well as at the T junction of Send Marsh Road and the Portsmouth Road. Additionally the extra traffic will substantially increase the risk of accidents and injuries at the very sharp bend in Send Marsh Road at the junction of Polesden Lane.

Attached documents:

Comment: MM35 - LPMM18/703  Respondent: The Clandon Society (Eric Palmer) 20626273  Agent:

The Clandon Society is the Residents’ Association of the villages of East and West Clandon.

The Association is restricting its comments in this consultation to matters which could directly affect our residents.

The Association is very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Association expressed its concerns in the strongest terms, pointing out the inadequacies of the road. The major modifications now proposed to the Plan will bring additional pressure on this road.

The Association welcomes the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 (MM48) and the amount of development proposed in the area nearby. (MM41. MM42. MM44. MM35.) However, residents are of the view that the provision of £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the likely traffic.

Residents do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available, if indeed it is technically feasible.

We believe that in a few years time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs when traffic diverts because of congestion on the A3. This was pointed out in detail in previous submissions by the Association, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint but this is not a unique problem
viz. the widening of the Boxgrove Road bridge. It is already the intention to build a station next to the Merrow Lane bridge.

The £1 million funding could with advantage be used to make the A247 safer.

Why do we believe that traffic will increase significantly?

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic. (MM42).
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247. (MM41).
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh. (MM44).
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Comment: MM48 - LPMM18/699  Respondent: The Clandon Society (Eric Palmer) 20626273  Agent:

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Attached documents:

**Comment:** MM9 - LPMM18/714  **Respondent:** Richard Derwent Cooke 20631329  **Agent:**

There simply is no allowance for the extra impact of all these new families on the infrastructure such as roads schools etc, this plan and others such as Dunsfold and Eashing will ruin this for all existing tax paying residents

**Attached documents:**

**Comment:** MM39 - LPMM18/715  **Respondent:** Simon Pugh 20631393  **Agent:**

The Guildford site comprises less than 50% in area of field in Godalming. Waverley BC has surreptitiously removed from the Godalming portion from the Greenbelt and earmarked it for the building of 262 houses, to great local shock and disapproval. There are numerous practical reasons why the Godalming portion alone would be disastrous to the area, but with the proposed removal of green belt status for the addition of the 200 houses on the Guildford site, the development becomes absurd. The failure by the developers and Waverley Borough Council to consult in a reasonable manner with the residents on any aspect of this developed was compounded by the news of this move by Guildford Borough Council, the announcement of which came after the period of consultation on the Waverley portion had closed.

Few would disagree that building genuinely affordable and available housing in Waverley, Guildford and beyond is a critical requirement for the sustainability of the area. This development is not, however, any part of the answer. The developers claim that a proportion of the proposed housing is ‘affordable’, but 80% of the fair value of any new home on this site greatly exceeds the budget of key workers and young people in the area. Further, those ‘affordable’ homes would revert to market price after 10 years, providing a windfall for the lucky first time buyers. There is an urgent need to secure brownfield sites for the development of public housing and genuine lower cost housing.

I urge those with any responsibility for the addition of this land to the Guildford Plan to visit the site and take serious note of the location and transportation issues in the area. Please approach the site from the three possible directions; that is, up Eashing Lane from Godalming or down Eashing Lane from Milford, and across the ancient one-way only stone bridge in Eashing. However, please do not add to the traffic queues by attempting your journey in the hours when locals are using the roads for travelling and from work, schools, etc. or any other busy time.

You should understand that the spread of Godalming above its valley setting has already exceeded its natural limits. The residential areas of Bushridge, Ockford Ridge and Aarons Hill are served by narrow roads that follow the geographical features defined by excavated paths through the Bargate stone terrain. There are no alternative routes, and no realistic options to increase the traffic flow. These roads are already incapable of handling the school, commuting and recreational traffic Godalming currently enjoys. These unalterable geographic limits alone demand that common sense prevails and
the plans on both the Waverley and Guildford sites be rejected, even without factoring in the disastrous environmental
damage, safety issues and various other serious concerns that are detailed by the Godalming Community Group and
others. We do not intend to expand here, but are happy to do so as required.

Please inform us of any public meeting where this issue will be discussed.

Attached documents:

Comment: MM27 - LPMM18/730  Respondent: Christina Reeves 20634753   Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for the above proposed developments added to nearby Gosden Hill, Wisley and Ockham have not
been properly addressed by the A3 changes and the Clandon slip roads. Guildford Borough Council offer no proper
assessment of the combined traffic on Send Barns Lane and Send Road when hundreds more cars use the roads every
day, causing more pollution, noise, delays and gridlock.

Attached documents:

Comment: MM41 - LPMM18/726  Respondent: Christina Reeves 20634753   Agent:

This e-mail is to show my objection to the Main Modifications to planning in and around Send. I accept that some new
homes need to be built but without new roads and supporting infrastructure the modified quantities will cause gridlock in
Send.

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

This is Green Belt land which has old woodland on it. There would be loss of habitat for wildlife. In effect Send and
Ripley will join up and constitutes over development.

This site can and does flood.

To increase the proposed number of dwellings by 37% is excessive. Previously 7000 objections were provided against
this development, these have been ignored!

The local schools and medical practice will not cope with the extra demand. The roads will not cope with the extra
vehicles.

Attached documents:

Comment: MM41 - LPMM18/731  Respondent: Christina Reeves 20634753   Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
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Attached documents:

Comment: MM42 - LPMM18/727  Respondent: Christina Reeves 20634753  Agent: 

MM42 Land at Burnt Common, London Road, Send, Policy A58

This plan has been increased twice since 2014.

This is the largest industrial development in any village in the borough. Slyfield has empty units – why not use these instead?

The roads around Burnt Common are narrow and extra vehicles will cause gridlock, plus lots of extra pollution (it’s already at a dangerous level).

There is not enough parking around the garage (mini Waitrose) as it is.

Attached documents:

Comment: MM42 - LPMM18/732  Respondent: Christina Reeves 20634753  Agent: 

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM44 - LPMM18/728  Respondent: Christina Reeves 20634753  Agent: 

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63

New site for 120 homes.

This is a “green belt” site which contradicts  Policy MM9. It has no special circumstances. It will not fit in with the buildings at Send Marsh Green.

The increase in traffic will put extra pressure on surrounding (narrow) roads.

Attached documents:
Together with the proposed developments at Garlicks Arch, Clockbarn and Winds Ridge this adds a further 770 houses to those already in Send. This is a increase of 45%. The current infrastructure cannot cope with this massive over development.

Attached documents:

Comment: MM48 - LPMM18/733  Respondent: Christina Reeves 20634753  Agent: 

MM27 MM41 MM42 and MM48 Transport Strategy

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Attached documents:

Comment: MM9 - LPMM18/729  Respondent: Christina Reeves 20634753  Agent: 

MM9 Green Belt Policy

Although green belt is supposed to be protected Guildford Borough Council allow “limited infilling” in exceptional circumstances. This leads to uncertainty for residents. Any land on the edge of our village could be “picked off” for development!

Attached documents:

Comment: Other comments - LPMM18/734  Respondent: Christina Reeves 20634753  Agent: 

Other Developments

This consultation excludes the chance to object again to 40 houses and a travellers’ site on Send Hill. 60 Houses at Clockbarn in Tannery Lane and a 25% increase in the size of Send Business Centre despite the Wey Conservation Area. This consultation only allows comment on main modifications.

Such heavy concentration of development in one village is too much. Surely this could be more evenly shared with many other villages.

Attached documents:

Comment: MM27 - LPMM18/739  Respondent: Mr. David Minnett 20636033  Agent:
The proposed changes to the A3 junction into Clandon and Send which will change the A247 into a major artery towards Woking will cause such a significant increase in through traffic that the quality of life for roadside and all other residents of Send Village will be changed catastrophically forever, as will the character of the area.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/748</th>
<th>Respondent: Mr. David Minnett 20636033</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>A 37% increase in the proposed number of houses for this development. Guildford Borough Council must listen to the local residents. 7000 residents previously objected to this proposal and have now have been ignored as this increased proposal is the table again. The Green Belt must be protected vigorously by GBC on behalf of its residents who they are meant to represent. More traffic and more strain on the local infrastructure. This is not what the local residents want.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM42 - LPMM18/740</th>
<th>Respondent: Mr. David Minnett 20636033</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM42 The intended plan for a minimum 14,800 sq m of industrial and storage sites, again on Green Belt land in Send is unfounded and scandalous. Deleted from the 2014 plan, this is now over double its previous size and is unnecessary as demand for industrial land locally is proven to be in decline. The road network to feed this plan is currently inadequate and will necessitate future road widening. The residents of Send do not want this.</td>
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<th>Comment: MM44 - LPMM18/741</th>
<th>Respondent: Mr. David Minnett 20636033</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>The building of 770 new houses in Send would increase the number of residents living in the village to such an extent the local infrastructure will be unable to cope. The 120 new houses that are planned for Alderton's Farm are to be built on precious Green Belt land which is supposed to be protected by law. Guildford Borough Council must comply with Green Belt policy as it was originally intended, and not use 'get out' clauses as a convenience. Already deleted from a previous draft due to local objection, the Council must again listen to their residents, for whom they supposedly represent. Combined with the proposed changes to the Send junction on the A3, if that and an Alderton's Farm development were both to go ahead, then the crossroad at Send Marsh Road will become a living nightmare for all residents living nearby.</td>
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<td><strong>Attached documents:</strong></td>
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</table>
Comment: MM9 - LPMM18/737  Respondent: Mr. David Minnett 20636033  Agent:

I am most concerned that the terminology which was intended to protect our Green Belt can be reinterpreted so as to suit the immediate needs of Guildford Borough Council instead of as was originally intended. Picking off sections of land or fields on the borders of our villages as 'exceptions' suitable for 'limited infilling' can only erode the protective strength of our Green Belt policy and will certainly weaken it further for future generations. There is no uncertainty as to what the residents of Send and other villages effected by these plans believe 'Green Belt' to mean. There only seems certainty that Guildford Borough Council is willing to disregard their views. Let us hope I am wrong.

Attached documents:

Comment: MM45 - LPMM18/738  Respondent: Mr Christopher Read 20636065  Agent:

I have lived in Normandy for 15 years and I am in favour of this new policy, ie I would like to see development on this site.

I share the concerns of my neighbours on infrastructure but, as an alternative to resisting development, I would urge the council, in due course, to apply with resolve policies on s106, CIL and Affordable Housing and not to let the developers argue down or out these benefits on spurious grounds of viability as too often happens.

If the requirements on infrastructure improvements and Affordable Housing are known and clear in advance, this should inform the site price (regardless of whether this land is already 'optioned'). If the developer is too keen and and if the landowner is too greedy and a deal is struck on the land at a level which, after costs, delivers a reduced level of profit, then, since the relevant policies (in particular on affordable housing and s106) will by then be clear, the council should ensure that there is no reduction in community/infrastructure benefits to subsidise this; the risk must lie with the developer and not with the community,

I do not object to this proposal on grounds of loss of green belt; too many times such arguments are allowed to prevail when, in reality, and crudely, there is plenty of green belt and this should not be allowed to prevent desperately needed housing.

I believe that, far from being detrimental to the character and life of the village, the arrival of 'new blood', and in particular young families, would be a good thing.

Attached documents:

Comment: MM45 - LPMM18/749  Respondent: Chris and Caroline Lenton 20637857  Agent:

Thank you for your time in reading this email in respect of the GBC draft local plan including the Normandy Amendment Proposal Ref MM45, Policy A64.

Having considered the Amendment Proposal Ref MM45, Policy A64, we have strong objections to the Amendment Proposal, and as a starting point would make the observation that it just seems an extraordinarily complex and problematic plan to implement given all the environmental, transportation and other logistical issues that will need to be addressed to significantly increase the volume of people and traffic in Normandy.

We appreciate that houses are required and need to be built somewhere, but they need to be built somewhere appropriate, and from our perspective there are three obvious and fundamental issues concerning Normandy that need to be dealt with as a starting point, namely:
• how are the already inadequate and busy roads going to cater for the increased volume of cars;
• how is the impact on the protected and fragile local eco-systems going to be satisfactorily managed; and
• how are the flooding issues that affect Normandy going to be sorted out.

Everyone will have their own personal issues and opinions in respect of all of the above and more, but we will just deal with the two issues that from our perspective just make the plans a non-starter regardless of anything else. This is not to say that we do not agree with and support other objections, but traffic and flooding are what we see on a daily basis.

Traffic

I work in Guildford and aim to leave at 7.30am every day and the absolute cut-off time for leaving is 7.45am. If I leave after that point then I will struggle to be at work for 8.30am. We are talking about a distance of 5 miles! The junction where I get on to the A323 is from Hunts Hill Road with Glaziers Lane directly opposite. By 7.45am there is a never ending stream of traffic going past that makes even turning left difficult. You have to take your chances and get out when you can, but at the same time you have the poor people trying to turn right from Glaziers Lane directly opposite, they just get stuck there, and sometimes you both pull out at the same time. It is dangerous and there is too much traffic already at this one junction.

My wife goes down to Petersfield so ideally she would cross the A323 from Hunts Hill Road to Glaziers Lane. She goes a bit later at about 8.15am and has given up trying to make that crossing, it is very dangerous, you wait for ages and when there is a gap in the traffic it is very unclear who has priority. She therefore goes in the opposite direction down Hunts Hill Road to Pirbright Road where she turns left and left again so that she can come to the end of School Lane and turn left and then right, all of which isn't very satisfactory.

There is already too much traffic. There have been big developments already around Ash that have flooded the roads with traffic with more proposed. We have not seen any proposals as to how the additional traffic can be accommodated, and we simply don't see what could be put in place from an infrastructure perspective to address the significant additional traffic volume that would result from the proposed developments in Normandy.

Flooding

The rain on Sunday caused flooding all over Normandy, there was static water and large puddles on every road, it is dangerous and a real issue. This is the case every time there is a significant amount of rain, be it during the Summer or the Winter. It is difficult to see how the development could not affect the stream running through the designated area, so where will this water go? In my experience unless works are specifically being done to address flooding issues, large developments just exacerbate the problem because there is less land for the water to drain into and it deprives the locality of the natural water courses so the water will need to find a new course. Flooding is a known and very noticeable issue in Normandy and again it is difficult to see how the proposed development would not make the situation even worse, not only for the areas immediately surrounding the development but further afield too where we live and the main roads that are already prone to flooding. Again there are no details of how this problem will be, or could be, addressed.

Moving away from the specific planning considerations we moved into Normandy fairly recently at just over 3 years ago, but have lived in the general area most of our lives and it seems extraordinary that Normandy should be singled out as the obvious place for a development of this sort. It is one of the few villages that still has a genuine village feel with a community of residents who have lived there all their lives. Very different from other local areas such as Worplesdon where we have recently moved from which is mostly inhabited by people who have recently moved out of London down to Surrey, keep themselves to themselves, and generally just view the village as a useful commuter base for London. This is why we moved here!

Obviously nobody wants a development in their back yard, and it is understandable that any people potentially affected by a development will react swiftly and with a huge element of self-interest. However we believe that Normandy is unique in being a genuine village community, and a close community that has been together for many generations. The reaction of a lot of the long term residents we have heard talk about it is one of bewilderment and sadness rather than anger and blatant self-interest, because they know what could be destroyed in terms of community and village spirit in addition to the worrying impact on the countryside and wildlife in the local and surrounding areas.
We understand that the decision rests in your hands so we would also ask that in addition to the more technical and legal arguments that will be thrown your way that you also just pause to consider the unique spirit of Normandy.

Attached documents:

**Comment:** MM39 - LPMM18/753  **Respondent:** Peter Goody 20638145  **Agent:**

I wish to register my objection to the removal of green belt status to farm land on Eashing Lane.

As I understand it the adjacent site on the Waverley borough council side has already lost this status, with the result that an overcrowded housing development of 262 houses is being proposed.

As a result if passed this would create extra traffic and pollution with the loss of valuable wildlife habitat.

The Guildford Borough plan for an extra 200 houses adjacent to a proposed 262 houses would be totally unacceptable on a site which is accessed by one country lane and is already overburdened with traffic.

Attached documents:

**Comment:** MM41 - LPMM18/758  **Respondent:** Emanuele Loggia 20638273  **Agent:**

I strongly object to the following proposed planning Sites:

MM41
MM42
MM44

Regarding MM41; proposed 550 homes is ridiculous! There are huge electric pylons in the fields! 100’s of studies worldwide have shown that living next to high voltage power lines and other parts of the power transmission network increases your risk of cancer and other health risks. I believe that the fields are contaminated with lead shot as there are regular shooting meets! This land is green belt with ancient woodland and feel strongly that this land should be kept this way. This land frequently floods and with noise pollution from the A3. This morning 15/10/2018 we experienced heavy rain fall in the night which caused major disruptions on the A3 in both directions and the surrounding Ripley, Send, Clandon and roads into Guildford were grid locked! We do not have infrastructure to cope with more cars, housing, schools, and medical facilities.

Attached documents:

**Comment:** MM42 - LPMM18/759  **Respondent:** Emanuele Loggia 20638273  **Agent:**

Regarding MM42; proposed 14800 sq m of industrial and storage; there is no need for this ugly planning! Slyfield has unused capacity and various assessments showed a reduction in demand for industrial land. May i stress again narrow surrounding roads will be grid locked and nitrogen dioxide levels increasing to dangerous levels!
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<tr>
<th>Comment: MM44 - LPMM18/760</th>
<th>Respondent: Emanuele Loggia 20638273</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Regarding MM44; This again will add to traffic increase, huge pressure on Send crossroads! Please think carefully and protect our green belt for our younger generations!</td>
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<tr>
<th>Comment: MM41 - LPMM18/787</th>
<th>Respondent: Elissia Loggia 20638529</th>
<th>Agent:</th>
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<tr>
<td>I am writing to strongly object to:</td>
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<td>-MM41</td>
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<td>-MM42</td>
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<td>-MM44</td>
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<td>Firstly, regarding MM41 plans to build 550 new homes at Garlicks Arch. I believe these ignoble proposals will destroy the place I have grown up and lived in for 18 years. The proposed site is Green Belt land which is visible from my bedroom window. Not only would building homes here ruin the tranquil setting associated with my quaint village that attracts many dog walkers, it would also ruin the environment and array of wildlife which resides there. At least an additional 800 cars would congest Send and Ripley’s roads and farm roads - which are already in a horrific state, but that's another issue! Furthermore resulting in an alarming amount of additional pollution accumulating which would be harrowing on the environment. The A3 runs adjacent to the proposed area, there is already enough pollution in this area as it is! Moreover, not only would these ridiculous proposals impact the environment and wildlife but also put potential residents in danger. The land has multiple pylons running through it, meaning residents would likely be bombarded with dangerous EMFs (electrical magnetic fields/ a form of radiation) which have indicted in numerous medical studies to increase the risk of several kinds of cancer and other diseases. I cannot comprehend why you would want to risk the good health of a community for the sake of an investment opportunity that would overpopulate my village and strain the educational and medical facilities which are already at breaking point.</td>
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<td>I firmly suggest you re-evaluate these fatuous proposals.</td>
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<td>Attached documents:</td>
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<th>Respondent: Elissia Loggia 20638529</th>
<th>Agent:</th>
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<tr>
<td>Secondly I object to the MM42 plans to place an industrial and travelers site on the land. We already have a nearby industrial site; Slyfield which still has unused capacity. Why would you waste time building an unnecessary industrial site, which would only increase the pollution in the area as explained above and contradict the MM9 Green Belt policy.</td>
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<td>Once again the proposals are in urgent need of reviewing.</td>
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</table>
And lastly I object to the MM44 proposal to build 120 new homes on Alderton Farm’s land. Repeatedly, this land is in Green Belt possession meaning it also contradicts the MM9 policy. The demand of this antic proposition, along with the following MM41 plan above would mean a 45% increase of housing in the send area. This figure realistically showcases the impossibility of what you are proposing. These avarice plans are too much for our infrastructure, Send will not be able to withstand this exploitation, especially as there are so little benefits to the present community.

Once again the proposals appear illogical and detrimental to our community, the money should be used for far more pressing issues that coincide within our society and are relevant to those who already live in the area.

I am writing to object to the Guildford Local Plan for the following reasons;

MM41 Garlicks Arch;

I live opposite this site which is on GREEN BELT LAND containing ancient woodland and prime agricultural land of which little is left in Surrey. 7000 previous objections have been completely ignored alienating local residents from the council. This lovely land forms a break in continuity between Ripley and Send and a buffer to the blight of ribbon development. The sight floods regularly and is wholly unsuitable for development due to the extra pressure this vast development will put on local services. Congestion and pollution and the huge increase in population will destroy our community. I object most strongly to MM41.

I did not object to the initial smaller planned development of this land. However since 2014 the proposed development has doubled in size after previously being deleted. There is absolutely no need for a development of this size when Slyfield has unused capacity and Send Business Centre is being expanded. The Employment Land Needs Assessment showed a reduction in the need for industrial land. Once again a development not needed adding to congestion and pollution destroying our communities. Send is being disproportionately targeted for over development whilst contradicting MM9. I strongly object to MM42.

Attached documents:
MM44 Aldertons Farm;

This is GREEN BELT LAND and previously deleted due to objections, but once again residents are being ignored. Send Marsh is a lovely heritage site around the green and this will be ruined. Another 120 homes here along with the other proposed developments will add 770 houses increasing the village by 45% this is wholly disproportionate. Again this will increase the strain on local services to breaking point. Congestion and pollution blighting our lives. I strongly object to MM44.

Attached documents:

MM9: Green Belt Policy;

"limited infilling outside the identified settlement boundaries where it can be demonstrated that the site can be considered to be within the village." This sounds good but GBC is using the subjectivity of this for a land grab. A golden opportunity for developer and speculators at the expense of local resident.

Attached documents:

Guildford Borough Council Submission Local Plan: Strategy and Sites - Main Modifications October 2018


Background - Regulation 19 Consultation and Statement of Common Ground

Our response, ref: WA/2011/111091/CS-04/PO1-L01 dated 20 July 2017, to the Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites Regulation 19 Consultation June 2017, found the plan to be unsound due to issues relating to flood risk.

We had concerns regarding Policy P4: Flooding, flood risk and groundwater protection zones. With regard to development within the functional floodplain, page 5 of the Strategic Flood Risk Assessment (SFRA) Level 1 states “there should be no increase in development vulnerability or intensification in use”. However, this is not reflected in Policy P4.

Therefore, we considered the policy to not be ‘justified’ by the evidence base or ‘consistent’ with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).

To overcome this point of soundness we suggested the following policy wording:

“Development proposals in the ‘developed’ flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability or intensification in use. Proposals within these areas should facilitate greater floodwater storage.” This was captured
in a Statement of Common Ground that was agreed between Guildford Borough Council and the Environment Agency in January 2018.

**Guildford Borough Submission Local Plan: Strategy and Sites – Main Modifications 2018**

We are pleased to see The Guildford Borough Submission Local Plan: Strategy and Sites – Main Modifications 2018 document includes the wording ‘there will be no increase in development vulnerability’. However, we are disappointed to see that the text does not include ‘or intensification in use’.

**Environment Agency Position**

We can confirm we no longer have any points of soundness with regards to the Local Plan.

**Final Comments**

Once again, thank you for contacting us. Our comments are based on our available records and the information submitted to us. If I can be of any further assistance, please contact me directly.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM32</th>
<th>Respondent: Environment Agency (Rachel Rae) 20638689</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Guildford Borough Council Submission Local Plan: Strategy and Sites - Main Modifications October 2018</strong></td>
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<tr>
<td>Thank you for consulting us on the Guildford Borough Council Submission Local Plan: Strategy and Sites - Main Modifications 2018. Further to our response, ref: WA/2011/111091/CS-05/PO1-L01 dated 16 October, we have the following points we would like to highlight.</td>
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<tr>
<td><strong>Points of clarity and accuracy</strong></td>
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<td>POLICY A60: White Lion Walk, High Street, Guildford</td>
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<td>The site is allocated for a mixed-use redevelopment, comprising approximately 50 homes (C3) and comparison retail floorspace (A1).</td>
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<td>We understand the sequential test (2017) identified the site as being in Flood Zone 1. According to our Flood Map for Planning a very small proportion of the site lies in Flood zone 2 and 3. Any future development proposals will need to include a site specific flood risk assessment. Development proposals should follow the sequential approach in order to steer development away from areas which are at the highest risk of flooding.</td>
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<tr>
<td><strong>POLICY A43: Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley</strong></td>
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<td>We understand the original allocation for 400 homes (C3), including some self-build and custom house building plots, and (2) 6 Travelling Showpeople plots (sui generis) has increased to 550 homes.</td>
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We are pleased the policy identifies flood risk as constraint. Any future development proposals will need to include a site specific flood risk assessment. Development proposals should follow the sequential approach in order to steer development away from areas which are at the highest risk of flooding. This is particularly important for Travelling Showpeople plots. However, Policy A43 does not include the main river, the East Clandon Stream which bisects the site, as a constraint.

We require any future development proposals to include an 8m wide minimum, undeveloped buffer zone (measured from bank top) on both sides of the river. Bank top is defined as the point at which the bank meets the level of the surrounding land. We welcome Policy MM29, and support the incorporation of paragraphs 4.6.48a and 4.6.48b into the plan.

We do however recommend that Policy A43 recognises the main river as a constraint at the site, and acknowledges the importance of providing a suitable buffer to it through any development proposals. This could be included in bullet point (4) of “other infrastructure”: Green corridors and linkages to habitats outside of the site, and significant regard to the river and the ancient woodland within the site. Alternatively, the protection and enhancement of the river corridor could be included as a suggested opportunity at the site.

**Final comments**

Once again, thank you for contacting us. Our comments are based on our available records and the information submitted to us.

**Attached documents:**

---

**Comment: MM27 - LPMM18/813  Respondent: Clive Sewter 20642081  Agent:**

I object to MM27 MM41 MM42 and MM48 Transport Strategy because:-

Currently, heavy traffic from the A3 already heads up to Woking through Send and even small roadworks cause major traffic jams, particularly at rush hour. This will be exacerbated when the proposed changes to the A3 improvements take place. With the extra industrial and housing developments in the areas mentioned above, Send will become regularly gridlocked.

**Attached documents:**

---

**Comment: MM41 - LPMM18/810  Respondent: Clive Sewter 20642081  Agent:**

I object to MM41 Land at Garlicks Arch, Send Marsh, Policy A43 because:-

*An increase from 400 to 550 homes is excessive.*

*There were 7,000 objections to the previous LOWER number, which have been ignored.*

*Green Belt should be honoured. It is being ignored or the rules 'bent'.*

*Overdevelopment will result in an increase in demand for water which is not viable and cannot be sustained.*

*The proposed area is a necessary and essential flood plain.*

*The increase in vehicles will block roads which already subject to becoming gridlocked.*
*There simply are not enough school places and medical practices to support additional population.

Attached documents:

**Comment:** MM41 - LPMM18/814  **Respondent:** Clive Sewter 20642081  **Agent:**

I object to MM27 MM41 MM42 and MM48 Transport Strategy because:-

Currently, heavy traffic from the A3 already heads up to Woking through Send and even small roadworks cause major traffic jams, particularly at rush hour. This will be exacerbated when the proposed changes to the A3 improvements take place. With the extra industrial and housing developments in the areas mentioned above, Send will become regularly gridlocked.

Attached documents:

**Comment:** MM42 - LPMM18/811  **Respondent:** Clive Sewter 20642081  **Agent:**

I object to MM42 Land at Burnt Common, London Road, Send, Policy A58 because:-

*Previous objections meant this proposal was deleted from an earlier draft. It was only Re-inserted in time for the public examination in July.

*This is Green Belt contradicting Policy MM9.

*The roads in and out of this area, especially Send Cross Roads, already jam up readily.

*The proposed additional homes at Garlicks Arch, Clockbarn and Winds Ridge total 650. Together with these proposed additional 120 homes, that is 770 more homes in this small village. NO WAY CAN OUR EXISTING INFRASTRUCTURE SUSTAIN SUCH AN INCREASE.

Attached documents:

**Comment:** MM42 - LPMM18/815  **Respondent:** Clive Sewter 20642081  **Agent:**

I object to MM27 MM41 MM42 and MM48 Transport Strategy because:-

Currently, heavy traffic from the A3 already heads up to Woking through Send and even small roadworks cause major traffic jams, particularly at rush hour. This will be exacerbated when the proposed changes to the A3 improvements take place. With the extra industrial and housing developments in the areas mentioned above, Send will become regularly gridlocked.

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Currently, heavy traffic from the A3 already heads up to Woking through Send and even small roadworks cause major traffic jams, particularly at rush hour. This will be exacerbated when the proposed changes to the A3 improvements take place. With the extra industrial and housing developments in the areas mentioned above, Send will become regularly gridlocked.

Attached documents:

I object to the "Modifications" to the interpretation of the Green Belt legislation MM9 because:-

*Guildford Borough Council need to reinforce the Green Belt legislation to protect our village from over-development at the expense of existing home owners and their residential needs.

Attached documents:

Reference; Normandy Main Modification MM45, Policy A64

I wish to record my objection to the above referenced planning policy. My objections are that the proposal has been introduced without consultation and without local residents being given the opportunity to suggest more suitable alternatives.

There are brown field sites in the area, in particular the Elms Centre where an outline application was rejected for the erection of 30 dwellings. The following reasons given for the rejection apply to the A64 proposal and are as follows;

The proposal would result in an adverse impact on the openness of the Green Belt and no very special circumstances have been put forward that would outweigh the inherent harm. The proposed development would also be at odds with the ribbon form of development within the area and would equally be to the detriment to the established semi-rural character of the area.

There are other sites which should be considered before A64 such as the Wyke Farm site at the Guildford Road end of Westwood Lane. The Wyke Farm site adjacent to the main Guildford Road and would accommodate 105 dwellings. Within that site a provision could be made to incorporate a roundabout at the Westwood Lane/Guildford Road junction. This would be a tremendous benefit to the community by way of easing road conditions at the junction, it would also reduce through traffic on Flexford Road and Glaziers Lane while taking into account future road transport requirements as well as the much needed slowing of traffic adjacent to Wyke School.

The change of use for the land for A64 from Green Belt is wholly unwarranted and would adversely impact upon the existing infrastructure, the existing local sewage system is already backing up on local properties to a point where some properties have installed non return valves to prevent homes being flooded with waste and Glaziers Lane is a country lane which is already overburdened with traffic.
This proposal has been made without any benefit to the local community or securing the long term future of village facilities, also the provision for the much needed improvement of the local infrastructure is missing from the proposal.

Attached documents:

**Comment:** MM45 - LPMM18/848  **Respondent:** Mrs Sarah Sangster 20642529  **Agent:**

Strong objection to the proposed development on the following grounds:

1. It has not been made clear what the 'exceptional circumstances' are to enable the Council to re-draw the green belt boundary in Normandy. The proposed development MM45 is red rated land in terms of green belt sensitivity.

2. Applications for development at other sites in Normandy have been rejected on exactly the same ground as apply to this one: inappropriate development in and negative impact on the openness of the green belt. This marks a u-turn by the council.

3. No justification about why this site has been chosen over any others - there is no clear advantage to this site over others. The burden of the proposed development does not have equivalent benefits to the community - as admitted in the Sustainability Assessment.

4. Adding this proposed development in the Local Plan Modification makes a mockery of the whole local plan process. Denies local residents the chance to have their say about development in their community.

5. Recent (Oct 2018) revised forecast for Guildford population growth from the Office for National Statistics means that expert opinion (Barton Fillmore) has calculated a decreased housing need - a 45% reduction.

6. Surface water flood risk at the eastern extent of development, (including a stream at the eastern extent which drains south to nearby Little Flexford SNCl) and what impact any changes will have on nearby properties - particularly driveways with a downward gradient. Our garage floods when there has been past excessive rain coming from the road by the proposed site.

7. Normandy residents already struggle with an overloaded sewage system, without extra houses adding a strain to the system.

8. Glaziers Lane is an unclassified road and will struggle to cope with substantially increased traffic this proposed development could bring.

9. Due to the fact that there are no local facilities in the area (the nearest shop, for example, is more than a 10 minute drive away), it is essential to use a car from the proposed site. The majority of people drive to work, with no local school within walking distance, residents have to use their car(s). There are a number of points in relation to increased traffic along Glaziers Lane:
   - Glaziers Lane has a 30mph speed limit and at points poor sight lines that have caused a small number of serious accidents in the past.
   - Current access to the proposed site is very close to a potentially dangerous blind bridge (due to its steepness) over which some drivers speed. The council has recently acknowledged this dangerous spot by investing in new pavement which extends further away from the bridge so that pedestrians do not have to cross the road at this same access point (the pavement only runs along one side of the road). Therefore it is not safe for cars to regularly exit out of this access point in addition to pedestrians crossing nearby.
   - Although reinforced 40 years ago, the bridge has suffered from front and rear edge subsidence as a consequence of local HGV traffic, exposing the front edge of the reinforcing concrete slab. Further disturbance by substantially increased
traffic and HGVs for this development project might lead to the closure of Glaziers Lane for bridge repairs. Although a Class D road, Glaziers Lane is used by through traffic HGVs for access to the A323 towards the Ash area to the west and A324 to the Worplesdon area to the east. More frequent damage to the road bridge due to significantly increased traffic flows would be hugely disruptive to local vehicle movements and disrupt this traffic flow which will have a back up effect onto the A31 at peak times, in addition to the cost of maintenance.

10. There is a fishing lake in the proposed development which has not been considered for wildlife.

11. The proposed site is within 2km of the Thames Basin Heaths Special Protection Area and will have a knock-on impact.

Attached documents:

Comment: MM27 - LPMM18/825  Respondent: A.A.D Andrews 20642561  Agent:

MM9 Green Belt Policy, MM27, MM41, MM42 and MM48 Transport Policy - I object

I think the planning committee pays no attention to Green Belt and public transport they just want [unreadable text] increased noise, nitrogen dioxide pollution, delays and gridlock plus there are other developments coming up. We need less houses and more amenities. These plans are rubbish.

Attached documents:

Comment: MM41 - LPMM18/821  Respondent: A.A.D Andrews 20642561  Agent:

This is an objection to Guildford Borough Council Local Plan

I object to MM41 Land at Garlicks Arch Send Marsh Policy A43

Increasing 400 to 530 homes is an increase of 37%. It is Green Belt containing ancient woodland that [unreadable text] up nitrogen dioxide levels of which are already dangerous - being a health hazard, especially for children. We need more schools and doctor surgeries, but you just close schools down. There are no community services. You will be pushing there to breaking point. It floods and has lead shot contamination.

Attached documents:

Comment: MM41 - LPMM18/826  Respondent: A.A.D Andrews 20642561  Agent:

MM9 Green Belt Policy, MM27, MM41, MM42 and MM48 Transport Policy - I object

I think the planning committee pays no attention to Green Belt and public transport they just want [unreadable text] increased noise, nitrogen dioxide pollution, delays and gridlock plus there are other developments coming up. We need less houses and more amenities. These plans are rubbish.

Attached documents:
**Comment:** MM42 - LPMM18/822  **Respondent:** A.A.D Andrews 20642561  **Agent:**

**MM42 Land at Burnt Common Road Send, Policy A58 - I object**

This has been doubled since being deleted from 2014 plan making it the target allocating industrial sites in the borough putting this in Green belt Land is ludicrus when Slyfield has unused capacity. Employment land needs assessment showed a reduction in demand, so why do we need this. It is also a health hazard. This is on top of a 25% increase at Send Business Centre makes a bigger concentration in Send than any other village with no proven demand.

**Attached documents:**

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**Comment:** MM42 - LPMM18/827  **Respondent:** A.A.D Andrews 20642561  **Agent:**

**MM9 Green Belt Policy, MM27, MM41, MM42 and MM48 Transport Policy - I object**

I think the planning committee pays no attention to Green Belt and public transport they just want [unreadable text] increased noise, nitrogen dioxide pollution, delays and gridlock plus there are other developments coming up. We need less houses and more amenaties. These plans are rubbish.

**Attached documents:**

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**Comment:** MM44 - LPMM18/823  **Respondent:** A.A.D Andrews 20642561  **Agent:**

**MM44 Land at Aldertons Farm Send Marsh, Policy A63 - I object**

It is a Green Belt site with no special circumstances so it contradicts MM9. It will distract from the heritage buildings on Send Marsh Green. It will add to the congestion in the area on Saturday the 6th October Guildford Woking were gridlocked. Bus were running of an hour [unreadable text] the weather was bad so adding to the problem will the planning commities come and sort out the gird lock situations. I dont think so.

**Attached documents:**

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**Comment:** MM48 - LPMM18/828  **Respondent:** A.A.D Andrews 20642561  **Agent:**

**MM9 Green Belt Policy, MM27, MM41, MM42 and MM48 Transport Policy - I object**

I think the planning committee pays no attention to Green Belt and public transport they just want [unreadable text] increased noise, nitrogen dioxide pollution, delays and gridlock plus there are other developments coming up. We need less houses and more amenaties. These plans are rubbish.

**Attached documents:**
Comment: MM9 - LPMM18/824  Respondent: A.A.D Andrews 20642561  Agent:

MM9 Green Belt Policy, MM27, MM41, MM42 and MM48 Transport Policy - I object

I think the planning committee pays no attention to Green Belt and public transport they just want [unreadable text] increased noise, nitrogen dioxide pollution, delays and gridlock plus there are other developments coming up. We need less houses and more amenities. These plans are rubbish.

Attached documents:

Comment: MM45 - LPMM18/847  Respondent: Mike Hughes 20643393  Agent:

Guildford Local Plan Consultation RE Plot A64

I wish to object strongly to the inclusion of the above site in the modified proposals for the local plan.

When an application to build 24 houses on this plot was made some years ago I was in favour as the plan included a number of more affordable homes, which the village desperately needs. Once the application was reduced to large 3 and 4 bedroom homes, of which the village has plenty I opposed the application. My opposition to the building of over 100 homes on this plot is based on the following.

1) Why is it now considered acceptable to build over 100 homes on a green belt site at which two applications for much smaller developments were refused on the basis that this was top level green belt and must be kept as such.

2) The infrastructure in the village is already overloaded and this development would only exacerbate that problem whilst adding no benefits to the overall community. In detail the road system in the local area is already stressed with delays common on major routes. The two north south roads in the village Glaziers Lane and Westwood Lane handle not only local traffic but a large number of crane trucks for the recycling facilities in the area as well as being used as rat runs during the rush hour periods. This area of Surrey and northern Hampshire is already in the process of a number of large housing developments which will exacerbate these problems. The added traffic from over 100 homes accessed from Glaziers Lane will result in chaos as the junction from Glaziers Lane to the Aldershot road is already a pinch point during the morning and evening. The doctors surgery and its parent at Fairlands are already stressed. The sewage and electrical supply systems in the area are already stressed by the number of small developments which have taken place with no infrastructure improvement. Without infrastructure improvements this is a no win situation for the village.

3) What are the 'exceptional circumstances' which would allow such a development on greenbelt land.

4) Why have the residents of Normandy not been approached to determine where they believe any development should take place.

5) A part of the development would be adjacent to the Strawberry Farm Waste Management Site. There appears to be no environmental assessment concerning any possible risk from this proximity.

Attached documents:

Comment: MM41 - LPMM18/849  Respondent: Send Parish Council (Send Parish Council) 20644225  Agent: Tibbalds Planning and Urban Design (Richard Crutchley)

Representations from Send Parish Council (ID: 15667489)
Background

Send Parish Council has made representations throughout the Local Plan process and appeared at the Examination in July 2018. This involvement has largely focused on the allocations made for housing and employment purposes within the parish of Send.

Send Parish Council wish to make further representations in response to the Main Modifications, which propose a number of changes to the plan that have an impact on Send parish. These changes are:
- an increase in the number of homes on the Garlick’s Arch allocation from 400 to 550 (MM41);
- the addition of policy requirements to mitigate the effect of development at Garlick’s Arch (MM41);
- an increase in the minimum size of the industrial allocation at Burnt Common warehouse, London Road (MM42);
- the allocation of the land west of Alderton’s Farm, Send Marsh Road, for 120 homes (MM44).

Context

Housing Projections, September 2016

Much of Send Parish Council’s concerns and representations over the duration of the Local Plan’s preparation have centred on the level of development proposed in the parish as a relative proportion both of that across the borough and in relation to other parishes in Guildford. Send Parish Council have consistently questioned the reasons why Send has been thought of as a suitable location for development, given its lowly position in the hierarchy of suitable sites for development, surrounded by green belt. The Examination explored this further and, based upon the evidence available at the close of the Examination, it seems apparent from the Main Modifications that the distribution of housing sites across the borough, including the sites at Send, remain appropriate in the view of the Inspector.

ONS projections

The release of the Office for National Statistics (ONS) projections in September 2018, following the close of the Examination, has thrown many of the assumptions about household growth (and therefore need) into question across many local authorities.

Particularly, in the case of Guildford Borough, the ONS figures predict that Guildford would have an additional 4,662 households by the end of the plan period, compared to the previous forecast of 7,717 new households. Guildford could now expect to have around 5,500 fewer households at the end of the plan period that was predicted by the data that formed the basis of the debate at the Examination.

The decrease in the number of homes required within Guildford has serious implications for the distribution of housing land and for the housing strategy more generally. As Send parish is expected to take a particularly high proportion of homes for a rural village, the Parish Council believes that the lower expectation of household growth provides an opportunity to think again about the sites that are essential and which should be amended or removed to in order to maintain the character of the settlements within the parish.

This changed context provides an underlying reason to challenge the changes proposed for Send parish through the Main Modifications.

Further, in light of the changed context in respect of housing requirements, some elements of the new text – for instance those parts of para 4.1.10 in MM2 referring to ‘step changes in housing requirement’ already seem out of date.

Main Modification 41

In light of the changed housing requirements discussed above, the Parish Council is of the view that the allocation at Garlick’s Arch is no longer required. It is recognised, however, that the Main Modification relates only to the increase in
residential units at the site, and the Parish Council object to this on the same basis. Increased numbers of housing also brings greater pressure on roads and other infrastructure and village services, particularly schools and health services. It is still not clear in the plan how this will be addressed.

The Parish Council welcomes the acknowledgement, in the addition of wording at MM41, of the argument that Garlick’s Arch is poorly related as a site to both the existing built form of the villages and the services provided by Send. The proposed wording begins to address this by seeking clarity over the provision of transport infrastructure at this site.

Whilst criteria (a) to (c) are fairly clear, (d) and (e) are not. There is no question in the Parish Council’s view, that non-vehicular connections to the village (as well as Burnt Common and Clandon) are necessary if any strides are to be taken towards sustainability and integration. The inclusion of ‘proportionate’ implies that necessary mitigation may not be provided in full by the developer, which raises the prospect of full mitigation not being achieved; indeed the risk that no mitigation occurs because of the absence of all of the funding required to achieve it is a distinct possibility. The Parish Council is concerned at the lack of certainty presented in the plan regarding this and would seek further clarification. It is noted that Appendix C contains no modifications in respect of this.

Criteria (e) is vague. The wording is open to interpretation. It is not clear which ‘otherwise adverse material impacts on communities and the environment’ the plan has in mind and therefore provides no certainty to the developer or the community, and no basis for the Council to assess the extent of contribution (necessary and proportionate or not) that may be required.

[1 As ‘villages inset from the green belt’, Send and Send Marsh are at the bottom of the spatial hierarchy, defined as Tier 10 within the Sustainability Appraisal. This tier provides 5% of the overall supply, but the Garlick’s Arch site accounts for around 2% of Guildford’s supply. Send parish accounts for 56% of proposed development supply in villages (based on the table at MM2).]

Attached documents:

**Comment:** MM41 - LPMM18/852  **Respondent:** Send Parish Council (Send Parish Council) 20644225  **Agent:** Tibbalds Planning and Urban Design (Richard Crutchley)

**Traffic implications of additional development introduced by the Main Modifications**

At present the Parish Council is working with Surrey Police, Surrey County Council Highways and the local school and medical centre on Send Barns Lane to develop options to deal with the significant highway problems (speeding, volume, parking, pedestrian / cyclist safety) in the village. The A247 is presently a very busy road and this should be considered before local plan allocations are brought forward.

Send Parish are unclear on the cumulative traffic implications of the concentrations of development being proposed by MM41, MM42 and MM44. It is noted that the landowner at Garlick Arch considers that there are benefits to be had from the slip roads in terms of the impact upon the A247, particularly in respect of southbound movements. It is not clear where this southbound traffic is redistributed to. The benefits to Ripley are evident as traffic is redirected to the Burnt Common junction; the benefits to Send seem intuitively less apparent.

Additional housing at Garlick’s Arch (MM41) and a new site at Alderton’s Farm (MM44) cause further concern. It is not clear whether the impacts of an open ended industrial allocation at Burnt Common (MM42) have been factored into this traffic assessment, or indeed whether other smaller housing allocations and the traffic expected of the expanded Strategic Industrial Location at Tannery Lane within Send have been modelled. Notwithstanding some new references to transport strategy at Garlick’s Arch and Burnt Common warehouse, the absence of alternatives to the car bring into question the overall strategy and approach to the parish.
The Sustainability Appraisal raises this directly; it recommends that clarification be made regarding the risk of severe traffic congestion in Send (para 10.4.6) without really explaining how this fear arises (beyond the extent of development proposed) and without a clear indication of where the recommendation has been actioned within the plan or the plan-making process.

Work must be undertaken to determine the additional cumulative highway impacts of all the development in the parish (on all roads infrastructure), having regard to the overuse of the existing road infrastructure.

Attached documents:

**Main Modification 42**

The Parish Council objects to the increase in the minimum floorspace at Burnt Common warehouse. The Parish Council is concerned about the open-endedness of the industrial allocation at Burnt Common. The allocation is insufficiently precise, and the consequences to the settlements and their infrastructure cannot be measured. Further, the uncertainty about the quantity of development makes good place-making, and consideration of complementary land uses, more difficult.

Particular concern relates to the ingress and egress of commercial and other traffic from the site. The existing junction of Portsmouth Road with the A3 slip road is presently extremely dangerous, even with limited traffic movement. A complete redesign of this junction should be made a specific requirement if you are minded to include the site.

The Parish Council welcomes the acknowledgement, in the addition of wording at MM42, of the argument that Burnt Common warehouse is poorly related as a site to both the existing built form of Send and the services provided by it. The proposed wording begins to address this by seeking clarity over the provision of transport infrastructure at this site.

Whilst criteria (a) is fairly clear, (b) and (c) are not. There is no question in the Parish Council’s view, that non-vehicular connections to the village, Garlick’s Arch* and Clandon are necessary if any strides are to be taken towards sustainability and integration. The inclusion of ‘proportionate’ implies that necessary mitigation may not be provided in full by the developer, which raises the prospect of full mitigation not being achieved; indeed the risk that no mitigation occurs because of the absence of all of the funding required to achieve it is a distinct possibility. The Parish Council is concerned at the lack of certainty presented in the plan regarding this and would seek further clarification. It is noted that Appendix C contains no modifications in respect of this.

Criteria (c) is vague. The wording is open to interpretation. It is not clear which ‘otherwise adverse material impacts on communities and the environment’ the plan has in mind and therefore provides no certainty to the developer or the community, and no basis for the Council to assess the extent of contribution (necessary and proportionate or not) that may be required.

*Criteria (0b) should include reference to links to Garlick’s Arch and not Burnt Common warehouse. This would be consistent with MM41, reflecting the need for links between Garlick’s Arch and Burnt Common warehouse.

Attached documents:
Traffic implications of additional development introduced by the Main Modifications

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Work must be undertaken to determine the additional cumulative highway impacts of all the development in the parish (on all roads infrastructure), having regard to the overuse of the existing road infrastructure.

Attached documents:

Comment: MM44 - LPMM18/851  Respondent: Send Parish Council (Send Parish Council) 20644225  Agent: Tibbalds Planning and Urban Design (Richard Crutchley)

Main Modification 44

The inclusion of the site at Alderton’s Farm, Send Marsh is a new allocation within the parish, in addition to those already identified at Clockbarn Nursery, Garlick’s Arch and Winds Ridge. This site has not had the benefit of thorough testing through the Local Plan process, having been excluded after the 2014 consultation. In light of the changed housing requirements discussed above, the Parish Council is of the view that this allocation is no longer required, and registers an in principle objection.

This plot is currently used as pasture. It forms a natural, picturesque, wildlife corridor between Send Marsh and the heart of Send village, and is a haven for many forms of wildlife, including many bird types and deer. The land has had a tendency to flood, with the run-off from this affecting nearby properties adjacent to the site. Development of this land would mean a loss of openness for the area and removal of the current natural and attractive separation between Send and Send Marsh.

The allocation currently comprises of green belt and, whilst the green belt in this location may be less intrusive than other locations, its loss represents further erosion of the green belt around Send and Send Marsh, erosion in addition to the existing allocations made, some of which are being intensified through the Main Modifications. The overall impact of green belt erosion around the parish is significant and has not been comprehensively assessed.
The Parish Council believes that the wording within MM44 offers insufficient guidance and comfort as to the form of development and the requirements that would be sought to integrate development both within its immediate context or within the wider parish. The wording in the requirements is unclear as to what is sought; terms such as ‘sensitive’, significant and ‘unacceptable’ provide little direction (and therefore comfort) in achieving a scheme that respects the elements – such as the site boundaries, transitions between village edge and open countryside and hedgerows – that are recognised as worthy of protection and attention. If ‘no unacceptable impact’ is the objective in respect of trees, for instance, is some impact acceptable? And if so, what?

As discussed with other allocated sites in Send, Alderton’s Farm is also distant from the village centre, and the location of most services on Send Road to the west, and access to it along Send Marsh Road is not always conducive to non-vehicular transport, such as walking or cycling. If we are to achieve a reduction in car use in the parish, particularly to and from services within the parish for residents, any allocation that remains in the plan needs to have a series of transport related conditions to ensure that contributions and facilities can be put in place to provide alternatives to short car trips, as has been the case with other sites (see MM41 and MM42 in particular). This should include physical connections such as improved pavements, cycle lanes and better crossings alongside initiatives such as more frequent bus services and reduced speed limits.

A further allocation of 120 dwellings within Send also places additional pressures on existing services within Send, which the Main Modifications do not address. During the Examination, the position in respect of Send and Ripley’s Primary Schools was discussed, as well as the extent to which Send’s Medical Centre could accommodate growth.

The wording at (2) in the Opportunities section of MM44, therefore, is weak and vague.

Finally, within the 2014 Plan, when the site was allocated, a SANG was identified adjacent to it which was capable of delivering recreational opportunities to residents, and this proposal was acceptable to Natural England. If the allocation is to find favour, the Parish Council would expect a reference in the plan to a similar provision of SANG to be available for current and future residents.

Attached documents:

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**Comment:** MM44 - LPMM18/854  **Respondent:** Send Parish Council (Send Parish Council) 20644225  **Agent:** Tibbalds Planning and Urban Design (Richard Crutchley)

**Traffic implications of additional development introduced by the Main Modifications**

At present the Parish Council is working with Surrey Police, Surrey County Council Highways and the local school and medical centre on Send Barns Lane to develop options to deal with the significant highway problems (speeding, volume, parking, pedestrian / cyclist safety) in the village. The A247 is presently a very busy road and this should be considered before local plan allocations are brought forward.

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Work must be undertaken to determine the additional cumulative highway impacts of all the development in the parish (on all roads infrastructure), having regard to the overuse of the existing road infrastructure.

Attached documents:

Comment: MM2 - LPMM18/855  Respondent: Berkeley Homes Ltd (Olivia Forsyth) 20644961  Agent:

Representations to Guildford Borough Council’s Proposed Modifications to the Local Plan (2018)

These representations are submitted by Berkeley Homes (Southern) Ltd.

Berkeley Homes has been working closely with the Howard of Effingham School in Effingham to develop an effective and modern school and much needed housing within the Effingham area.

These plans were initially proposed for development in the Draft Local Plan (2014), which formed the basis of a planning application for the provision of a replacement school and 295 enabling residential dwellings. The scheme was refused planning by Guildford Borough Council and later granted planning permission in March 2018 by the Secretary of State following an appeal by Berkeley Homes.

Following the grant of planning permission, it is considered that the current allocation of land within Effingham would result in a Local Plan that is out of date prior to it even being adopted and as such, the following sites should be allocated for the development they have planning permission for:

- Existing Howard of Effingham School - allocated for up to 100 dwellings
- Browns Field - allocated for 37 dwellings
- Lodge Farm - allocated for approximately 160 dwellings and a secondary school.

This approach is supported by the NPPF which states at paragraph 67 that "planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) Specific, deliverable sites for years one to five of the plan period; and

b) Specific, deliverable or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the plan".

Appendix 0 identifies the Howard of Effingham development providing 265 dwellings in years 2019/20 to 2024/252 which clearly demonstrates that the Council are relying heavily on the delivery of the scheme for their housing supply and it is accepted that the sites are deliverable within the specified timescales.

Despite the grant of planning permission however, a comprehensive review of the Green Belt in Effingham should be undertaken. The resultant northern boundary of the residential development site is not considered to be a defensible Green Belt boundary. The land between the consented residential development and Thornet Wood to the north should be removed from the Green Belt and be allocated for residential development, for approximately 100 dwellings, which would include a significant provision of affordable housing.
Policy S2: Borough Wide Strategy

Policy S2 sets out the Council's strategy for planning and positively meets its Objectively Assessed Needs (OAN) which are required by the NPPF (paragraphs 14 and 17). This policy particularly focuses on the Borough-Wide housing target.

In relation to this target, we would note the following:

- The proposed plan pushes back the plan period again from 2011-2031 to 2015-2034. Given the under delivery of housing since 2011, the current approach means Guildford is very likely to see fewer homes delivered by 2034 than is required and there is no strategy identified to meet the backlog of the years no longer included within the Plan period.
- The phasing of development "backloads" the housing target. The overall housing target is equivalent to 663 dwellings per year but the Council is not planning to deliver that many homes in any year until 2020/21, with that provision largely from sites already with planning permission. Additional sites should be identified and allocated for immediate delivery in 2019/20-2020/21 to address the immediate need and under delivery between 2011 and 2018.
- There appears to be a lack of flexibility within the allocations. If any one of the larger sites fails to deliver, Guildford will not be meeting their housing requirement.

Policy D1 - Place Shaping

Berkeley acknowledges the importance of a "design" policy but questions the need to include a specific requirement for a Design Review Panel on all large schemes. The policy also requires that proposals within villages should have regard to:

a) The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape.

b) Important views of the village from the surrounding landscape

c) Views within the village of local landmark

The use of a Design Review Panel on schemes within villages, carries a risk that the above requirements are diluted and more bespoke and individual design influences from the Panel are introduced where they may not be appropriate. The requirement for the use of a Design Review Panel should be at the discretion of officers on a case by case basis rather than being a core requirement of "large" schemes.

Conclusions

Following the grant of planning permission for the replacement Howard of Effingham School and associated residential development on Lodge Farm, Effingham, there should be a review of the settlement and Green Belt boundaries around Effingham. The whole of Lodge Farm should be removed from the Green Belt and allocated for the replacement Howard
of Effingham School and residential development, with the existing school sites on Lower Road and Browns Lane, allocated for residential development.

The current allocations of land within Effingham contradict the recent planning permissions and as such will result in a Local Plan that is out of date before it is even adopted.

Please do not hesitate to contact us if you would like to discuss any of the above points in more detail.

Attached documents:

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Comment: MM26 - LPMM18/859  Respondent: Berkeley Homes Ltd (Olivia Forsyth) 20644961  Agent:

Policy ID1: Infrastructure and Delivery

Policy I1 sets out the Council's proposed approach to infrastructure delivery and cross-refers to Appendix C which is a schedule of infrastructure items. Infrastructure delivery is regarded as a crucial element of Local Plan making by government and is one of the five strategic policy areas identified by the NPPF (para 20) that Local Plans should cover, namely: "the provision of health, security, community and cultural infrastructure and other local facilities".

In our view, Policy I1 continues to take a narrow view of infrastructure provision without providing a proper reasoned justification for the items identified in Appendix C or their relationship to the overall Spatial Strategy for the Borough.

There is no reference to the Howard of Effingham School within Appendix C and the additional school places permitted within the existing planning permission for the redevelopment on Lodge Farm.

Attached documents:

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Comment: MM6 - LPMM18/857  Respondent: Berkeley Homes Ltd (Olivia Forsyth) 20644961  Agent:

Policy H2: Affordable Homes

Policy H2 indicates the Council's proposed policy in relation to providing more Affordable homes. Berkeley Homes welcomes the additional of section 4a within the Policy wording.

Attached documents:

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Comment: MM9 - LPMM18/858  Respondent: Berkeley Homes Ltd (Olivia Forsyth) 20644961  Agent:

Policy P2: Green Belt

Paragraph 139 of the NPPF sets out the guidance to local authorities when defining Green Belt boundaries and states that plans should:

"a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;"
b) not include land which it is unnecessary to keep permanently open;


c) where necessary, identify areas of safeguarded land between the urban areas and the Green Belt, in order to meet
longer-term development needs stretching well beyond the plan period;


d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the
permanent development of safeguarded land should only be granted following an update to a plan which proposes the
development;


e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

With specific reference to f), the granting of permission for the replacement Howard of Effingham School and associated
residential development at Lodge Farm creates a "leftover" parcel of land between the residential development and
Thornet Wood. Thornet Wood, as ancient woodland, is a physical feature that is both recognisable and likely to be
permanent and as such, would create a much robust and defensible boundary to the Green Belt.

It is considered appropriate that the whole of Lodge Farm is removed from the Green Belt and incorporated in the
settlement boundary of Effingham. This would create additional opportunities for residential development, and the
delivery of much needed affordable housing, thereby also ensuring the Green Belt boundary would not need to be altered
again at the end of the plan period.

Attached documents:

Comment: MM39 - LPMM18/889  Respondent: Cherry Mills 20647393  Agent:

I wish to object to the proposal in your Local Plan to remove an area of field at Aaron’s Hill, Godalming from Green Belt
protected status, in order to allow the construction of 200 homes. My reasons are:

1. To remove this field from Green Belt will constitute urban sprawl – Refer to your Policy P2 Green Belt point
   4.3.11.
2. This is a productive agricultural piece of land.
3. This area has precious flora and fauna and should remain protected. A full, independent, ecology report should
   be taken into consideration.
4. Any housing proposal for the Guildford half of this field should be considered, in conjunction with the
   application currently with Waverley Borough Council for 262 houses, as an application for 462 houses.
5. The road infrastructure in this area is not able to cope with the additional traffic that 462 homes would bring.
   Godalming’s road network is already very overloaded and comes to a standstill when there are any incidents on
   the A3.
6. The site is on top of a hill which makes it difficult for people to walk or cycle to and from Godalming.
7. The train service to Waterloo is overcrowded at peak times, has only two stopping services per hour at
   Godalming station. There are not enough spaces in the carpark for current uses so any additional commuters will
   not be able to park their cars near the station.
8. One principal route to this site would be through the village of Eashing where the bridge over the River Wey
   could not cope with extra traffic and is a Grade I Listed Monument.
9. A second principal route to and from this site is via Eashing Lane, which leads on to the A283. This is a narrow
   road where two-way traffic has to slow down to pass. There is no right hand turn at the end of this road on to the
   A283.
10. There is inadequate public service infrastructure to cope with this additional number of homes – doctor’s
    surgeries, hospital, ambulance, fire service, police response.
11. There is a Grade II Listed property adjacent to the site – Westbrook – which will be detrimentally affected by any development. Full consideration of the Heritage aspects of any development must be considered.

The water and waste water supply network to the area is very old, already problematic, and will not be able to cope with the increased usage by 462 homes

**Attached documents:**

**Comment:** MM27 - LPMM18/926  **Respondent:** Duncan Speight 20654049  **Agent:**

I am writing to you to object to the planning inspectors report relating to the development of Send Village and the surrounding area, in particular MM41, MM42, MM44 and the related impact on the Green belt covered under MM9 and the transport strategy that impacts the above sites and site MM27.

Upon reading the outputs from the latest report it would appear that rather than listening to and addressing local residents’ concerns raised in the previous consultation periods you have just ignored those and continued to drive the plans forwards. In addition, GBC has significantly increasing the sizes of the Garlicks Arch development, doubled the industrial and storage development in Burnt Common and reinstated the Alderton’s Farm development which was previously deleted due to previous objections.

I would also seriously question that accuracy of the Public Examination figures (Policy S2) for Guildford Borough Housing, recommending 789 houses are built each per year. Reviewing the Barton Wilmore figures (suggesting 431 houses a year) and the ONS population forecasts suggesting the development of 460 houses a year across the borough. These well-respected authors reports suggest the need for new houses in this specific part of GBC has been significantly overinflated

The plans GBC lays out in the report do not support the policy for the protection of the Green Belt. Furthermore, the subjective test proposed puts the Green Belt at considerable risk and negates Green Belt protection. This means any land on the edge of the village could be picked off for future development. This point is clearly of serious concern to local residents

Send Village and the surrounding area already suffers from significant traffic congestion. Traffic on the local roads is gridlocked in busy periods. It is clear from the plans that the suggested remedies do not adequately address the significant increases in traffic we will see if these developments are allowed to go ahead. In particular, Send Barns Lane, Send Road and Broadmead Road will not cope with the increased traffic heading in and out of Woking every day. Not only will the increases in traffic cause significant delays but will also impact residents with increased noise and nitrogen dioxide pollution levels.

As the people that live and experience the local area every day we are well positioned to provide an accurate point of view on the impact developments of this size will undoubtedly have on the area. On that basis I hope you give this issue the time and attention it deserves.

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**Comment:** MM41 - LPMM18/923  **Respondent:** Duncan Speight 20654049  **Agent:**

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Comment: MM9 - LPMM18/927  Respondent: Duncan Speight 20654049  Agent:
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Attached documents:

**Comment:** MM45 - LPMM18/959  **Respondent:** Mr Shaun Sangster 20656961  **Agent:**

I object to the Main Modification 45 – MM45 – dealing with policy A64 of the Guildford Local Plan, due to the following reasons:

- The Council has been unable to state what the ‘exceptional circumstances’ which mean that the Council can redraw the greenbelt boundary in Normandy.
- In fact, previous applications for development at other sites in Normandy have been rejected on exactly the same ground as apply to this one: inappropriate development in and negative impact on the openness of the Green Belt. Previous rejections have actually stressed the extreme sensitivity of the site and the damage that would be done to the openness of the Green Belt should development be allowed on it. By adding this additional proposed development into the Local Plan it is a ridicule of the whole Local Plan process. It means that local residents can’t have their say about any change in their community, as they previously have in past rounds of consultation.
- The Sustainability Assessment stated that there is no benefit for the community to this development taking place. It would of course, though, place a burden on the resources of the community and on the Green Belt. There is no clear justification for this site to be developed over any other. There are no strong arguments.
• In order to fulfil the 105 homes quota on this proposed site, there would need to be buildings 3 storeys, maybe 4 high. This would be completely out of character for Normandy and Flexford and also the view from the Hogs Back – it would severely detrimentally affect the Surrey Hills Area of Outstanding Natural Beauty.
• The total housing number in the Local Plan fails to take into account the very latest housing projections by the Office for National Statistics. So the numbers for Guildford population growth are overstated. Expert opinion from Barton Willmore has confirmed a 45% reduction should be applied.
• Failure to consider brownfield sites by the Council.
• No infrastructure improvements have been proposed as part of this Main Modification to the Local Plan. The proposal would increase the size of Normandy by 7% - not an insignificant amount for a small village.
  ◦ Normandy residents already struggle with an overloaded sewage system, without extra houses adding a strain to the system.
  ◦ Surface water flood risk at the eastern extent of development, (including a stream at the eastern extent which drains south to nearby Little Flexford SNCI) and what impact any changes will have on nearby properties – especially driveways with a downward gradient. Our garage floods when there has been past excessive rain coming from the main road by the proposed site.
  ◦ Glaziers Lane is an unclassified road and will struggle to cope with substantially increased traffic this proposed development could bring. Glaziers Lane has a 30 mph speed limit and at points poor sight lines that have caused a small number of serious accidents in the past. Despite having a train station, due to the lack of local facilities in Normandy, owning a car is essential in order to live in the village.
  ◦ Current access to the proposed site is very close to a potentially dangerous blind bridge (due to its steepness) over which some drivers speed. Up until recently, pedestrians also had to cross the road next to this access point because the pavement ends here and starts again on the other side of the road. The council has recently acknowledged this dangerous spot by investing in new pavement on the other side of the road, so that it extends further away from the bridge so that pedestrians do not have to cross the road next to this same access point. It is not a safe place for the number of potential cars likely to regularly exit out of this access point – in addition to pedestrians crossing nearby.
  ◦ Concerned about the possible environmental hazards of the Strawberry Farm waste management site. No assessment has been made.

Attached documents:

Comment: MM39 - LPMM18/961  Respondent: Victoria Standen 20658433  Agent:

I would like to voice my strong objection to the proposed development of 462 houses in or adjacent to the Green Belt on Aarons Hill in Godalming.

I live on Eashing Lane, and each morning for 3+ hours, the whole road is jammed right back up to Aarons Hill, down past the Inn on the Lake and through to Godalming town centre. Adding roughly 400-odd new cars (at the very least) into this mix without any provisions for such a huge traffic increase would be an absolute disaster. Myself and my neighbours regularly get our wing mirrors clipped and car doors scratched while parking roadside on Eashing Lane - this kind of damage would increase tenfold along with the extra cars using the road every day.

The Green Belt land at the top of the road, which you want to flatten and replace with houses, is truly cherished by our community, and our local wildlife. It would be a damn shame for yet MORE of our landscape to be marred with new houses, which we do not need. We need the Green Belt land, and so does our local wildlife. I imagine my protestation will fall upon deaf ears and you'll go ahead and build your houses anyway, but I ask that whichever building company you choose can please consider making hedgehog highways (small gaps in garden fences for animals to pass through safely) and bat/bird boxes in the brickwork and eaves of new properties. Sensitive 'dark corridors' and dimmed lighting would also be beneficial to nocturnal animals like bats, dormice and other wildlife. Bellway Homes are real trailblazers to this effect, and you can find more about their wildlife conservation efforts here: https://www.bellway.co.uk/corporate-responsibility/environment/biodiversity-and-ecology
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Why is the plan for 500 homes when over 7,000 objections were received for just 400 homes. The local infrastructure and the lack of plans to develop nearby roads and services can not sustain 400 homes let alone 550. It is quite apparent that you don't care for the views of local people or the quality of the environment that you will be creating for residents (both existing and new)

Why is there a need for further industrial and storage sites in the area when there is unused capacity at Slyfield Green, a purpose built industrial estate away from houses and where expansion should be focused. It should be noted that Send has already increased its business centre by 25% with no proven demand.
Comment: MM44 - LPMM18/966  Respondent: Mr Tom Holwell 20658625  Agent:

MM44 Alderton’s Farm. Why has this been re-added? The current plans include the addition of 1700 homes in Send that’s an increase of 45%. We simply don’t need all these new houses when the housing market can only be described as stagnant. The economy is grinding to a halt and building all these houses will not help.

I am of the firm opinion that the Guildford Planning Inspector clearly does not live in this area and so does not care about the mess that is being proposed for the people who live here.

Attached documents:

Comment: MM9 - LPMM18/963  Respondent: Mr Tom Holwell 20658625  Agent:

Having received so many written objections to the previous plans, did you seriously feel the villagers of Send would not continue to save their village and environment. The Surrey infrastructure as a whole is at breaking point to say the least and so increasing the traffic whether by increasing the number of houses or industrial/storage space is absolutely stupid.

Clearly the Planning Inspector is ignoring the Green Belt (MM9) and under no circumstances can the actions proposed be said to be protecting it.

Attached documents:

Comment: MM23 - LPMM18/1017  Respondent: Jim Rattray 20658689  Agent:

Following my attendance at the Guildford Vision meeting on 16 Oct I remain concerned about the modified local plan. In particular I have the following comments:

• MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority

Attached documents:

Comment: MM3 - LPMM18/1020  Respondent: Jim Rattray 20658689  Agent:

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
I am a long term resident of the Borough

Attached documents:

Comment: Other comments - LPMM18/967  Respondent: Jim Rattray 20658689  Agent:

Following my attendance at the Guildford Vision meeting on 16 Oct I remain concerned about the modified local plan.

**My principal request is that the Inspector’s Examination be reopened**, as there are too many issues (some very recent) that need to be sorted out before this plan be approved.

I intend to send a separate letter commenting on some of the issues.

I am a long term resident of the Borough

Attached documents:

Comment: MM2 - LPMM18/979  Respondent: Carmen Niblett 20658817  Agent:

**Policy S"** - Barton Willmore, from a respective consultancy, has advised that the correct figure should be 431.

September data from the Office for National Statistics, which does population forecasts, suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are greatly lower than the total assumed by the Inspector. This could make a massive difference to developments in Send.

Please explain how with this application, it will not constitute over development by joining Ripley and Send villages.

Attached documents:

Comment: MM27 - LPMM18/982  Respondent: Carmen Niblett 20658817  Agent:

**MM27 MM41 MM42 MM48  Transport Strategy**

The traffic implications for Send of the extra traffic generated by Garlick's Arch, Burnt Common, Clockbarn and Alderton's will have a totally detrimental effect in the area which already is over used by traffic from A3 and Clandon and Woking commuters.

GBC is offering solutions on paper but for the last 20 years of people and car growth in that area has been ignored by GBC.

I have lived in the Send area for 35 years and I can categorically confirm that nothing has changed in that time, except for the replacement of the bridge at the end of Send Road, which now permits higher number of articulated lorries to travel along the Send Road to Ripley, the A3 and Clandon (as the old bridge couldn't cope before with the weight or width of these lorries).
This increase traffic through Send put children, vulnerable people and adults at risk of accidents when crossing the road to either go to school or to the shops or for a walk.

The traffic on the Send Barns Lane and Send Road are usually at a stand still, especially at key times, when children are walking to school. Air pollution is a terrible danger to our children and we should be minimising this risk instead of adding thousands of more cars to our roads.

I would request that you supply details that show you are being fair and reasonable to all village councils in the Guildford Borough in a form that shows existing number of houses in that area and the number of new applications (as a total number of houses) and express this as a percentage %.

This would then show that the GBC are being fair across the whole county. Instead it will show that GBC are being totally unfair and overburdening SEND village with their insistence in putting all their "eggs" in SEND's basket.

**Attached documents:**

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**Comment:** MM41 - LPMM18/978  **Respondent:** Carmen Niblett 20658817  **Agent:**

I would like to very strongly object to the following Planning Applications.

**MM41 Land at Garlicks Arch**  Policy A43..... the 7000 objections to the previous 400 houses have been ignored and now the proposal is even higher 550, this is totally unacceptable.

This is Green Belt that contains ancient woodland and also if the existing school and medical facilities are only just sufficient to the current existing local needs how will they cope with the extra residents. The road are extremely busy at key hours and can barely cope with the current traffic.

**Attached documents:**

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**Comment:** MM41 - LPMM18/983  **Respondent:** Carmen Niblett 20658817  **Agent:**

**MM27 MM41 MM42 MM48**  Transport Strategy

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**Attached documents:**

**Comment:** MM42 - LPMM18/980  **Respondent:** Carmen Niblett 20658817  **Agent:**

**MM42 Land at Burnt Common** Policy A58 This was I believe deleted form the 2014 plan yet now it has been increased twice and therefore has doubled the area.

Please explain how this increase can be allowed

I would like to be informed as to why "*unused capacity of the industrial land at Slyfield is not being used in the first instance and only when that is fulfilled, Send can be considered*".

**Attached documents:**

**Comment:** MM42 - LPMM18/984  **Respondent:** Carmen Niblett 20658817  **Agent:**

**MM27 MM41 MM42 MM48** Transport Strategy

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Attached documents:

Comment: MM44 - LPMM18/981  Respondent: Carmen Niblett 20658817  Agent:

**MM44 Aldertons Farm**  A63  As this is Green Belt land it contradicts policy MM42, it therefore should be withdrawn. The existing roads, which are already at bursting point, would not be able to cope with the additional traffic. *The local road infrastructure should have been addressed 20 years ago*, yet this requirement was put on the shelf and will continue to be on the shelf for years to come.

Attached documents:

Comment: MM48 - LPMM18/985  Respondent: Carmen Niblett 20658817  Agent:

**MM27 MM41 MM42 MM48**  Transport Strategy

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A very very concerned resident.
**Comment: MM27 - LPMM18/994  Respondent: Mrs E.E. Wheatley 20659073  Agent:**

Transport Strategy. MM27. MM41. MM42. MM48.

Objections.

A) Traffic implications are horrendous

B) No assessment apparently of the impact locally of gridlock, delay, noise, air pollution and general anger and frustration of local residents. Do we get any consideration from [unreadable text]

**Comment: MM41 - LPMM18/990  Respondent: Mrs E.E. Wheatley 20659073  Agent:**

I object strongly to MM41 - Policy A43

A) The increase in the number of houses is excessive

B) Previous objections ignored.

C) Ancient Woodland on Green Belt Land should not be destroyed.

D) Traffic congestion will be a problem especially considering Highways plans for M25 junction 10. Do different departments confer or even communicate?

E) Facilities like medical provision and education will be insufficient. Again re education, the closure of Ripley School does not make sense if these plans go ahead.

F) Send and Ripley must survive as villages and not become a suburb of Guildford.

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Transport Strategy. MM27. MM41. MM42. MM48.

Objections.

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**Comment:** MM42 - LPMM18/991  **Respondent:** Mrs E.E. Wheatley 20659073  **Agent:**

**MM42 Policy A58 Objections**

A) No need for further industrial development space already available at Slyfields. Why use Green Belt Land?

B) Contradiction of MM9 with no special circumstances sited.

C) Road capacity will not cope and air pollution will be a dangerous hazard.

**Attached documents:**

---

**Comment:** MM42 - LPMM18/996  **Respondent:** Mrs E.E. Wheatley 20659073  **Agent:**

**Transport Strategy. MM27. MM41. MM42. MM48.**

Objections.

A) Traffic implications are horrendous

B) No assessment apparently of the impact locally of gridlock, delay, noise, air pollution and general anger and frustration of local residents. Do we get any consideration from [unreadable text]

**Attached documents:**

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**Comment:** MM44 - LPMM18/992  **Respondent:** Mrs E.E. Wheatley 20659073  **Agent:**

**Objections. MM44. Policy A63**

A) Another contradiction of policy MM9.

B) Traffic congestion will create difficulties of immense proportions for everyone.

C) Local facilities will be unable to cope.

**Attached documents:**

---

**Comment:** MM48 - LPMM18/997  **Respondent:** Mrs E.E. Wheatley 20659073  **Agent:**
Transport Strategy. MM27. MM41. MM42. MM48.

Objections.

A) Traffic implications are horrendous
B) No assessment apparently of the impact locally of gridlock, delay, noise, air pollution and general anger and frustration of local residents. Do we get any consideration from [unreadble text]

Attached documents:

Comment: MM9 - LPMM18/993  Respondent: Mrs E.E. Wheatley 20659073  Agent:

Objection. MM9 Green Belt Policy

A) G.B Council's exception to the policy to allow infilling outside settlement boundaries negates the policy on Green Belt and opens the door to speculators at the expense of residents.

Attached documents:

Comment: MM44 - LPMM18/1010  Respondent: Dr Jeremy Gross 20659265  Agent:

Policy A63, MM44, Land at Alderton's Farm

I object strongly to this proposal on the grounds that:

1. Previous objections that resulted in the withdrawal of this proposal have been ignored.

2. Both during the building works and even more so once they are completed, it will increase traffic pressure on Send Marsh Road and the Portsmouth Road leading onto the A3 as well as Send Barns Lane and the approaches to Woking. Traffic pressure on the Send Crossroads is already unacceptable and Ripley is already a major bottleneck for traffic, especially during rush hours and barely acceptable outside these hours. The extra pressure will increase noise and traffic delays which will exacerbate the natural increase in air pollution to be expected from the increase in the number of vehicles likely to be associated with the extra housing.

3. Polesden Lane is already a "rat run" for commuters trying to avoid current bottle-necks, with too many vehicles travelling too fast for such a narrow lane. The adoption of these proposals and the resulting increase in congestion (particularly during construction) would be bound to increase that number..

4. No extra infrastructure has been proposed to cope with the extra housing proposed in this policy in combination with those involving Garlick's Arch, Clockbarn and Winds Ridge - a total of 770 houses i.e a 45% increase - and this will place an unacceptable extra load on the standard utilities as well as schools, medical practices, hospitals etc.

5. The land affected is currently Green Belt and no special circumstances have been set out to justify an exception. This policy relies on a purely subjective test and conflicts with both MM9 and national guidance on Green Belt land.

6. There are heritage buildings including the 17th century manor house at Send Marsh Green and the proposed buildings will severely compromise their architectural integrity.
Comment: MM27 - LPMM18/1051  Respondent: Theresa Gianotti 20663393  Agent:

MM27 MM41 MM42 and MM48

- Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and
- No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Comment: MM41 - LPMM18/1048  Respondent: Theresa Gianotti 20663393  Agent:

Just why do we need to write again with similar objections to before!

Below you will see some my comments and thoughts:

MM41

- This land is Green Belt and contains ancient woodland that needs to be preserved;
- Results in significant over development to an area I have lived in for many years for its space, quiet and rural attraction;
- The estimated 800 extra cars will result in gridlock; and
- GP surgeries, schools and hospitals will be strained to breaking point.

Comment: MM41 - LPMM18/1052  Respondent: Theresa Gianotti 20663393  Agent:

MM27 MM41 MM42 and MM48

- Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and
- No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Comment: MM42 - LPMM18/1049  Respondent: Theresa Gianotti 20663393  Agent:

MM42
• There can be no justification for another industrial site in the Green Belt when Slyfield has spare capacity;  
• The traffic at peak times on narrow surrounding roads will come to a stand still; and  
• Nitrogen dioxide levels in our area are already dangerous.

Attached documents:

Comment: MM42 - LPMM18/1053  Respondent: Theresa Gianotti 20663393  Agent:

MM27 MM41 MM42 and MM48

• Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and  
• No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Attached documents:

Comment: MM44 - LPMM18/1050  Respondent: Theresa Gianotti 20663393  Agent:

MM44

• Detracts from the heritage buildings in the area;  
• This is Green Belt and contradicts policy MM9;  
• Extra traffic will place more pressure on the Send Crossroads; and  
• An extra 770 houses is just too much for the existing infrastructure.

Attached documents:

Comment: MM48 - LPMM18/1054  Respondent: Theresa Gianotti 20663393  Agent:

MM27 MM41 MM42 and MM48

• Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads; and  
• No proper assessment of the traffic impact with thousands more cars in the area every day adding to increased pollution, noise, delays and gridlock.

Please don't allow our rural community to be destroyed by overdevelopment.

Attached documents:

Comment: MM25 - LPMM18/1090  Respondent: Olive Edwards 20663873  Agent:
MM25 Historic Environment: We think the new proposed wording is very vague and offers inadequate guidance to protecting a heritage asset. We think the previous wording was more specific and offers greater guidance and protection and should be restored and the new proposed wording rejected.

Attached documents:

Comment: MM6 - LPMM18/1089  Respondent: Olive Edwards 20663873  Agent:

We wish to make the following comments on the main modifications identified in bold below:

MM6 Affordable Homes 4a: Relates to developers claiming they can't provide the required amount of affordable housing because it would not be economically viable. The previous wording stated 'may consider the following to assist with delivering a scheme' and now says 'will' rather than 'may'. We feel strongly that it should revert back to the original wording "may" as this will enable the Council to achieve more affordable housing and not enable developers to find excuses not to make such provision. Developers are already pushing these boundaries without making it even easier for them. There is no need to change this wording.

Attached documents:

Comment: MM39 - LPMM18/1091  Respondent: Karl Corpes 20664161  Agent:

Proposed House Development Aarons Hill Godalming.

I have viewed the proposals for the 200 new dwellings to be built on land that backs onto Aarons Hill. This also needs to be looked at in conjunction with the 262 new homes proposed by Waverley council.

I find this project to be wholly inappropriate for the area, because of the lack of joined up thinking behind the project. The reasons being:

1) Green belt land has been reclassified as a brown field site. The National Planning Policy Framework for the Green Belt states there is a general presumption against inappropriate development, unless very special circumstances can be demonstrated to show that the benefits of the development will outweigh the harm caused to the green belt. The NPPF sets out what would constitute appropriate development in the green belt.

According to the NPPF, there are five stated purposes of including land within the green belt:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns from merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It would appear that all of the above has been ignored. The field on what the houses will be sited is still actively farmed. Reclassifying land just to build more and more houses means that once the precedent has been set land will continue to be reclassified.

2) Very limited infrastructure improvements have been included. Godalming’s traffic during peak hours is notoriously bad. Travelling from the top of Eashing lane, next to Green Oaks School, down Eashing Lane, and through the town...
along the only viable route through the town to the town bridge, a distance of 1.3 miles regularly takes over 20 minutes during morning peak hours. Ashill estates based their traffic surveys on data taken during school half terms or on a Friday. There will obviously be a reduction of traffic during this time. They are manipulating the data for the own benefit.

- Building 200 + 262 more houses, with the associated increase in the number of cars will only add to this time.
- Eashing Lane in both directions is unsuitable for the increased traffic flows. The road is narrow, and at several points the road is not wide enough for traffic to pass in either direction. It is also used as a short cut to Godalming from the A3, especially when there are traffic jams on the A3.
- Godalming’s topography is unsuitable for continued development. The town is situated in a river valley with hills either side. The roads surrounding the town to gain access are narrow and clogged with parked cars that already delay traffic, namely Brighton Road, Shackstead Lane, Eashing Lane and Chalk Road.
- Office buildings in Godalming are being turned into flats to meet housing demand. This means that there are fewer locally available jobs therefore individuals will have to travel to work in other towns, quite often by car.
- Bus services in Godalming have been cut, and trains from Godalming during peak hours are seriously over crowded, meaning it is highly unlikely an individual will find a seat during peak hours.
- Traffic in Godalming is also delayed because the council are changing traffic lights to the cheapest available, to just save money rather than trying to keep the traffic moving. Rather than having a smart system that can react to traffic flows and people crossing the road, the council has opted for a system that simply works on a timing system the motorist has to wait until the lights go through the whole sequence including the time when all lights are red at a junction to let pedestrians cross.
- Traffic lights are also red during peak hours at junctions to let pedestrians cross when there is nobody at the crossings. Let pedestrians cross, but link the pedestrian crossing to the traffic lights. Don’t stop the traffic for no reason; this simply adds to the traffic problems.

3) Godalming’s proximity to Guildford and Dunsfold means that it is affected by planning decisions taken at these locations. The proposed development of housing on Dunsfold aerodrome, with no improvements in roads or rail, and the lack of improvements to Guildford’s road system or improvements to Guildford train station mean that Godalming and the surrounding roads will become more clogged with traffic.

4) The development has no joined up planning (thinking) behind it. Building houses cannot be done without the corresponding improvements in infrastructure. Yes, there is a lack of housing, but why not regenerate areas of the country that are crying out for investment, rather than cramming more and more into an area that already has serious traffic problems. The majority of houses will be sold at market value, and only a very small proportion will be affordable houses.

5) Individuals, who have bought houses in the vicinity of Aarons Hill, may have done so because of the proximity to the Green Belt boundary and countryside, not to have their vista turned into a housing estate.

6) There are no provisions for Doctors, Dentists etc. 462 houses will put more pressure on local services.

7) This development would appear to be beneficial to two groups, the council so it can say that it has met its housing targets, and the developers who will bank the profits, and the land owner. There would appear to be little consideration for the populace of Godalming.

Attached documents:

Comment: MM27 - LPMM18/1095  Respondent: Marc Lippiett 20664481   Agent: MM27, MM41, MM42, MM48 - Transport Strategy
Traffic congestion is a significant issue in the area (Send, Ripley and Woking) and there are currently significant delays caused every day on the way to school and work. The current plans do not provided clarity on how these critical issues will be avoided.

Supposing that the traffic congestion issue can be mitigated in an acceptable way, there will be no avoiding the noise and air pollution and associated impact on the quality of life for local residents.

**Objection to MM41 (land at Gartlicks Arch, policy A43)**

- This is Green Belt containing ancient woodland and the proposed increase from 400 to 550 homes is excessive.
- There has been significant objection in the past to any development but these 7000 objections have not been accommodated, and so it is not appropriate to then propose further additional development.
- The space between Ripley and Send will disappear, essentially turning two small villages into a small single town and constitute overdevelopment.
- This is a floodzone with lead contamination and not appropriate for development.
- As per my objection to A63, above, the infrastructure is not sufficient to support the additional households. The roads already suffer significant congestion, there is extremely limited opportunity to alleviate these pressures, and any further development will make living and working/commuting in the area unviable on a day to day basis.

**Objection to MM42 (land at Burnt Common, policy A58)**

Traffic congestion is a significant issue in the area (Send, Ripley and Woking) and there are currently significant delays caused every day on the way to school and work. The current plans do not provided clarity on how these critical issues will be avoided.

Supposing that the traffic congestion issue can be mitigated in an acceptable way, there will be no avoiding the noise and air pollution and associated impact on the quality of life for local residents.
- The proposed size of the industrial estate is disproportionate to the size of the village and would have significant negative impact on the Green Belt (and there are no special circumstances that support this, especially as there is capacity at Slyfield)

- The increased traffic in the area would exceed the capacity of the infrastructure and further compound existing traffic congestion in all directions

Attached documents:

**Comment**: MM42 - LPMM18/1097  **Respondent**: Marc Lippiett 20664481  **Agent:**

**MM27, MM41, MM42, MM48 - Transport Strategy**

- Traffic congestion is a significant issue in the area (Send, Ripley and Woking) and there are currently significant delays caused every day on the way to school and work. The current plans do not provided clarity on how these critical issues will be avoided.

- Supposing that the traffic congestion issue can be mitigated in an acceptable way, there will be no avoiding the noise and air pollution and associated impact on the quality of life for local residents

Attached documents:

**Comment**: MM44 - LPMM18/1092  **Respondent**: Marc Lippiett 20664481  **Agent:**

Please see below my clear objection to the proposed Main Modifications in Send under the Guildford Local Plan.

**Objection to MM44 (land at Alderton's farm, policy A63)**

- The proposal to develop 120 homes in this area will have catastrophic impact on the nature of the area, which is a Green Belt site and there is no special circumstance that require it be developed (and so it also contradicts policy MM9)

- The roads in the area are already at capacity and every day are congested at peak times of the day. The pressure on Newark Lane and Send Crossroads would be significantly beyond capacity as these are bottlenecks today and already cause significant delays for people get to and from work or taking children to and from school (something that I as a parent and a commuter in the village already suffer every day and further traffic congestion would make commuting unviable)

- The above is particularly compounded by the further proposed developments in the Send area - the infrastructure is not sufficient to cater for the proposed developments. I would also not advocate further developing the infrastructure as this would further detract from the village and green belt and, even more significantly, bottlenecks such as the Newark lane humpback bridge and width of Newark Lane at Ripley make it unviable to alleviate the pressure

- Based on good judgement this proposed development was removed from an earlier draft of the plan but has now been re-inserted and I believe strongly that this is a catastrophic mistake for the reasons outlined above

Attached documents:
MM27, MM41, MM42, MM48 - Transport Strategy

- Traffic congestion is a significant issue in the area (Send, Ripley and Woking) and there are currently significant delays caused every day on the way to school and work. The current plans do not provide clarity on how these critical issues will be avoided.

- Supposing that the traffic congestion issue can be mitigated in an acceptable way, there will be no avoiding the noise and air pollution and associated impact on the quality of life for local residents

Attached documents:

Comment: Other comments - LPMM18/1099 Respondent: Marc Lippiett 20664481 Agent:

Other developments

- This consultation does not provide for the ability to comment on other proposed developments at Send Hill, Clockbarn, Send Business Centre.

- These other developments, combined with the above developments, put further strain on the infrastructure, detract from the Green Belt and nature of the village, and compound the issue that Send is absorbing a disproportionate level of development relative to other local villages, and the development should be more evenly distributed.

My thanks for your taking the time to hear my objections and rationale. As a local resident I am extremely concerned about the impact of the proposed developments on the area, for the reasons given above, and trust that good judgement will confirm that the area of Send is not appropriate for and able to accommodate such a scale of development.

Attached documents:

Comment: MM45 - LPMM18/1100 Respondent: Bob Hutton 20664513 Agent:

I am writing in response to the consultation regarding the Guildford Draft Plan.

As a resident of Normandy, I am particularly concerned and would like to register my objection to the Policy A64, in which 105 houses are proposed for Normandy.

I have a number of objections

1. This site has not been mentioned in any of the previous consultations, so this is a very late stage in the proceedings to request feedback on the viability of the proposed site.

2. The site is within the current green belt and there are no exceptional circumstances for it to be considered. The site is very close to the AONB and any significant developments would be visible from and damaging to the views from the Hogs Back.

3. On parts of this site there have been previous smaller planning applications, all of which were rejected; among the reasons given were that the proposed developments would go against the current linear nature of Normandy’s Glaziers Lane, as well as the lack of services in the area.
4. Given that there is already a pond on the site it is difficult to see how 105 houses could fit onto this site, without removing the pond and/or building houses of more than two storeys, which would also be out of keeping with the surrounding area.

5. This area, as with several other locations in Normandy is susceptible to flooding; this occurs not only by occasional flash flooding as a result of heavy rainfall, but also by foul water resulting from overflow or blockage of the local sewerage systems.

6. The proposed number of houses would provide excessive strain on Normandy's services. The local junior school and the doctors' surgery are at breaking point and would be unable to cope with the additional workload. The report notes that Normandy has a lack of shops and other services. There is no indication that any additional services or facilities would be provided along with the proposed site.

7. The addition of this number of houses would also increase the traffic on Glaziers Lane significantly. It is not reasonable to expect all the occupants to use the train, so it is normal to expect each household to own and use two cars. Glaziers Lane is classed as a 'D' road and already has large numbers of cars and heavy lorries using it on a daily basis.

8. The location of the site would lead to an entrance/exit very close to a narrow bridge that is on a bend and is blind. There are regular complaints that the bridge is dangerous, and the bridge surface is already suffering signs of wear from the already heavy use.

9. There are many reports that the latest housing figures are an exaggeration, so these latest figures should be considered.

10. There should be further consideration of brown field sites and the town centre area before damaging the green belt.

11. Finally, this site is being proposed as a quick win; I understand the ownership of the overall site is not clear and given that the site includes the pond, it is likely that there would be significant complexity and objection to any plans.

Thank you for the opportunity to comment on the changes to the Draft Local Plan. I am largely supportive of the contents of the plan, but feel that it is important that its acceptance does not damage the nature of the green belt, nor does the need for rapid response to issues raised by the inspector result in lack of due consideration of the merits and demerits of proposed site allocations.

Attached documents:

Comment: MM45 - LPMM18/1101  Respondent: Sue Hutton 20664897  Agent:

I am writing to register my objections to the plans to build 105 houses as site A64 on Glaziers Lane in Normandy. Building this number of houses in that location would be totally out of character with the rest of Glaziers Lane and is in the green belt as it gives the area views out into the open countryside. Putting buildings there would result in the area being built-up and would surely result in even more houses to be built resulting in the loss of Normandy as the collection of rural hamlets it is currently.

This would also result in significantly more cars on Glaziers Lane, which is already busy. There would also be more families needing to use the surgery and junior school which are already heavily used. As there are no shops in Normandy, there would also be more shopping trips or delivery vans on the Lane.

I'm aware that there was a public meeting where about 200 people attended and there was almost universal objection to building in this location.

Please reconsider the plan to build in this location. Surely there must be old commercial buildings or shops in the Guildford area that could provide this number of houses without building on the green belt?

Attached documents:
**Comment: MM39 - LPMM18/1118  Respondent: Susan Douglas 20665633  Agent:**

I wish to send my absolute objection to the proposed development at Arrons hill.

Does anyone spare a thought for the Infrastructure. Schools. Doctor’s. Godalming is already under stress with traffic. I live on the Brighton Road and the volume of traffic is huge because there is nowhere else that it can go.

Nobody seems to mention the white elephant Prime Place that doesn’t seem to be selling. How can you ruin a really lovely small Town? Answer is you are doing a really good job.

**Attached documents:**

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**Comment: MM45 - LPMM18/1130  Respondent: Dennis W. Higgins 20666401  Agent:**

Normandy Proposal, Main modification 45 / dealing with Policy A64

MM45/ A64

I object to this planning proposal as to effect it's build the council need to re-draw the Flexford village boundary north of it's current position, namely the railway line through Wanborough station. The current boundary fully separates the villages of Flexford and Normandy, thus allowing their quite separate identites, and historic charm, to prevail.

In redrawing the Flexford boundary to accommodate this proposal, the council is going against the fundamental aim of green belt policy as supported by the National planning practice guidance. i.e. "to prevent neighbouring towns (villages) from merging into one another". In redrawing the boundary this will start this devastating reality. This proprosed site is already rated "red" for sensitivity to prevent the urbanisation of Normandy as a whole.

I also object to this MM45/A64 proposal as I am not aware that Guildford Borough Council (GBC) have given as needed the "Special circumstances" surrounding the need to develop this land. My understanding is that they must define the "exceptional reasons" why this land is more suited than other sites within the borough. This they have not done.

I also object to MM45/A64 proposal because of the sheer scale of development, an increase of some 7% or more homes in Normandy. The strain placed on services and facilities needed is one issue, but GBC have not outlined any improvements to the infrastructure of the surrounding villages needed to complete this proposal.

I also object that what will result from this proposal is no more than a "Housing Estate" that is totally out of character with the existing housing stock in the area. In short there is no benefit to the Flexford/Normandy villages, but a guaranteed long term strain on the communities existing facilities.

I also object to MM45/A64 proposal as GBC have inserted this into the Local Plan at the last minute without any serious consultation with the residents of this area, and appears to be inserted as some sort of "Quick fix" to satisfy the Inspectors new housing quota. GBC need to focus on avaliable brownfield sites within the borough before randomly plucking green belt land as sensitive as this land, and throwing it into the plan.

Green Belt land is only that if it is open and permanent. We are located so close to the "Surrey Hills" which is an "Area of outstanding natural beauty". This proposal will impact on the view from that vantage as well as simply destroying our natural village life by it's mere presence.

I ask you to reject this proposal MM45/A64 in full.

**Attached documents:**
Comment: MM45 - LPMM18/1131  Respondent: Sheila Higgins 20666561  Agent:

MM45 / A64

I refer to this above mentioned proposal (MM45 / A64) and wish to object on the following grounds.

1. Guildford Borough Council (GBC) has not put forward, as required, the "exceptional circumstances" that surround the reason for wanting to use this green belt land over existing brownfield sites available in the borough.

2. The natural border, separating the two villages of Flexford and Normandy is currently the railway line. I object the GBC re-drawing that boundary line to accommodate this proposal as it will effectively merge the two villages thereby causing them to lose their individual identities.

3. The sheer number of houses, an increase of 7% or more, will result in a strain on our existing services (Doctors, Schooling, Public transport) and the resulting increase in the volume of traffic/lorries during construction will damage the already weak infrastructure that exists in the villages. GBC have not proposed any improvements to the already overloaded road and sewage networks to accompany this proposal.

4. GBC has not fully appraised existing brownfield sites available in the borough for development. They are reserving these for commercial/retail use. It is widely accepted that the fact of the high street is changing and will continue to do so due to internet shopping. This is accepted by large and small retailers alike. GBC need to look at re-developing these sites for residential use.

5. Previous refusals for use of this "red" rated for sensitivity Green Belt land, have declared the extreme damage to the openness that would be caused. Green Belt has got to be seen to be permanent to be effective.

As a resident I object to this proposal completely.

Attached documents:

Comment: MM2 - LPMM18/1151  Respondent: Jennie Moss 20667169  Agent:

RE: MM41 Land at Garlicks Arch, Send Marsh, Policy A43 - INCREASE OF 37%
MM42 Land at Burnt Common, London Road, Send, Policy A58
MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63
MM9 Green Belt Policy
MM27 MM41 MM42 and MM48 Transport Strategy

I am a resident at Send Road and prior to that lived in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]. I have two children who attended [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] which has now closed, one child moved to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] which has now closed, one child moved to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] which has now closed, one child moved to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018], my other child is now at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018].
which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018 [no school transport available and if she would like to get to school on time no public transport available, let alone travelling over an hour to get to school if she were to take public transport - not acceptable!). You are given 6 choices for secondary schools and we didn't receive any of the 6 choices, but after two appeals and a lot of waiting we were offered [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] but logistically I have to take her and collect her. The reason behind this is because all schools are over subscribed and areas are over populated. HENCE MY REASON THAT I HAVE TO OBJECT WITH MORE HOUSES BEING BUILT.

The journey to school currently takes 30 minutes, Send to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] is a 10 minute journey without traffic! Again more houses leads to more transport on the roads, WE ARE OVER CONGESTED WITH TRANSPORT NOW, SO AGAIN ANOTHER VALID REASON NOT TO BUILD MORE HOUSES.

Send is a village and IF all the above proposed is carried out Send will not be a village anymore. I think all the facilities ie: medical, schools are at breaking point now adding more will lead to disaster.

Attached documents:

Comment: MM45 - LPMM18/1184  Respondent: Mrs Amanda Wordingham 20670529  Agent:

I feel that there is no need to build on green belt protected land. There are plenty of other areas to build on!

Also the roads are not designed for the huge amounts of extra traffic. We have no local amenities. The local schools can’t support the families that would move in.

Attached documents:

Comment: MM10 - LPMM18/1223  Respondent: Jim Allen 20674913  Agent:

Policy P3; Countryside

This is not consistent with National Policy regarding how and when to develop in the countryside can occur. Note: two of the three properties along the road in this area are referred to ‘farms’ thus can be ‘repurposed within the countrysid

Attached documents:

Comment: MM2 - LPMM18/1217  Respondent: Jim Allen 20674913  Agent:

Response to Main Modifications submission Local Plan –September/October 2018

Introduction
This response statement is submitted to the Planning Inspector presiding over the examination of the Guildford Local Plan. It sets out my formal response to the Proposed Main Modifications but should be read in conjunction with my earlier submissions on the Local Plan. My comments relate to the suitability of these modifications to make the plan sound under current policy and legislation.

Background

As a private individual I was the only person to attend the full examination in public. Observations of the process show the limitations of the Inspector to make right those glaring errors identified within the plan.

Note 1: These observations are made on the understanding that the 2018 NPPF is the defining document in making these modifications.

Note 2: Claiming infrastructure requirements for individual sites are not the concern of Local Plan Soundness, is unethical and morally unsustainable. If the plan fails to include the correctly assessed physical ability for the local infrastructure to cope with additional housing, it must surely be considered practically and politically unsound as it is detrimental to those already in the community as well as those arriving into the new housing locations. As required by the relevant sections of the 2018 NPPF.

Note 3: The release of the New Housing figures; which you mused at the end of 3rd day end of 3rd session “ Housing requirement for the plan period September and midyear middle of June will be taken into account of any meaningful change in the situation”. This release subsequently has occurred on 20th September and displayed around a 40% decrease range.

The housing number modifications, when compared with the main modifications, which correctly imply no strategic housing (actually no housing) can sustainably or realistically be brought forward in the first five years, due to severe foul water infrastructure constraints. See below.

This need for the five year land supply has theoretically added some additional 672 houses per year for 5 years to the previous number of 12,768; thus the council is now providing between 15,000 and 16,126 “plots”; the majority on Green Belt sites, when a number of approximately 6,832 or averaging 402 per annum would suffice local need plus affordability needs. The claimed ‘exceptional circumstances’ need to release three strategic sites in the Green Belt has ceased to exist, both in numerical plot terms and in location of strategically placed sites. A decision has to be made which one or more sites will be removed from the Local Plan. Below is the table covering predicted Growth from the ONS for both pre and post EiP. Constantly changing the formulae means no one will ever agree. My calculation is based on simply statements of fact and ONS figures. It is based on the start year of 2018 for simplicity and these figures are already set in the stone of the past decrees, so all I had to do was discover the decrease of Household formations as predicted. Apply this decrease to the previously declared numbers supplied by you as the inspector and GBC via a declaration by the Councillor for infrastructure Matt Furness. The resultant figure is an annual build out rate of 402 PA or a total of 6,832 for the period up until 2034 meaning an over capacity into the Green Belt of 4,592 housing Plots – thus now, no justification or sound argument exists to move the Green Belt line for Gosden Hill with its traffic blocking two right turns to exit North, and the removal of the ill-fated Slyfield regeneration project, thus allowing TW to finance refurbishment of the treatment works without re-location, to provide for Blackwell Farm and the other minor sites.

Justification for removal of Policy A25: Gosden Hill is outlined below.
Page 1: Response to Policy S1;

1. Policy Para (3)(a)

1.1. I support this phrasing as it gives greater clarity to the weight to be accorded to the NPPF in decision making.

2. Reasoned Justification Para 4.1.4

2.1. I agree this change as it gives additional protection to sites and assets with a specific designation.

Page 2: Response to Policy S2;

3. Policy Para’s (1) to (3)

3.1. I am concerned that these figures still do not represent a reasonable calculation of housing need; noting that the reason Woking cannot meet their needs is their refusal to release Green Belt. It is therefore inequitable to expect Guildford to release further Green Belt land having released so much for its own requirements. We look forward to you revisiting these figures released on 20th September technical data is released as you stated during the EiP.

Page 3: Reasoned Justification Para 4.1.9a to 4.1.10.

The Statement fails to take note of the requirement ‘where it is practical to do so’ - it is not practical to do so without moving into Green Belt to build houses and the Minister has specifically stated housing is not an exceptional circumstance. Woking Borough ‘stealing’ Green Belt from Guildford to protect Woking Green Belt is inequitable and counterproductive as it provides no incentive for any borough to meet its own needs.
Clearly the objective via the NPPF Policy/ statutory requirement of the Local Plan is ‘to meet the objectively assessed needs’ making no mention of having to ‘exceed’ those needs or by how much, many commentators are indicating that the Local Plan over supplies by something in excess of 4,000 housing plots for the plan period. Thus the Local Plan far exceeds its legal or policy remit with this over supply and therefore must be seen as unsound as it is using exceptional circumstances to move Green Belt boundaries to insecure soft boundary locations from the current solid boundaries set in the 1940’s. Clearly there is no exceptional need when individual sites are taken into consideration, at least two strategic sites could be removed from the Plan and still meet the policy requirement of objectively assessed need.

Para 137 (c) of the new NPPF states that a statement of Common Ground is required as part of the justification for Green Belt release. No such statement of Common Ground has been drawn up between the two boroughs. Therefore allocating housing from Woking is currently incompatible with the wording of the 2018 NPPF. Further there is no provision for the inspector at EiP to force agreement or set a random number. This should be considered in its entirety, or not at all, as part of the examination of this Local Plan. I raise this issue because we note with interest that the Main Modifications make specific reference to the new requirements of the 2018 NPPF.

Page 4: para 4.1.9ab Table S2a Sources of supply

10. The Court of Appeal (Sir David Keene) observed at [6]:

"6. There is no doubt, that in proceeding their local plans, local planning authorities are required to ensure that the "full objectively assessed needs" for housing are to be met, "as far as is consistent with the policies set out in this Framework". Those policies include the protection of Green Belt land. Indeed, a whole section of the Framework, s.9, is devoted to that topic, a section which begins by saying "The Government attaches great importance to Green Belts": para.79. The Framework seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that "the general extent of Green Belts across the country is already established." It seems clear, and is not in dispute in this appeal, that such a Local Plan could properly fall short of meeting the "full objectively assessed needs" for housing in its area because of the conflict which would otherwise arise with policies on the Green Belt or indeed on other designations hostile to development, such as those on Areas of Outstanding Natural Beauty or National Parks. What is likely to be significant in the preparation of this Local Plan for the district of St Albans is that virtually all the undeveloped land in the district outside the built up areas forms part of the Metropolitan Green Belt."
In 2015, Thames Water declared an available sewer capacity for 4,000 new homes across the borough. This table S2a reveals that the BNF’s estimate of 2,000 homes with permissions or completed since 2015 (please see our hearing statement) was an underestimation. As 3,675 homes have been approved or completed since 2015, this is some 1,225 ‘plots per year’ far in excess of the deemed requirement of 672. In fact it is almost double that requirement. Meaning the ongoing OAN Pa has already been over supplied by 1,659 Plots. Thus the figure over 15 years should already be an OAN of 561 pa not 672. Proving the plan OAN is now well short of the infrastructure requirement for five year land supply, let alone the total volume of new homes proposed over the plan period.

The demonstration provided by many, concerning infrastructure short fall has been proven by the inspectors comments that sites cannot come forward prior to provision of this infrastructure and has led to a seriously misguided and unsound approach to ‘capacity’. The Council, Environment Agency and Thames water have or plan to ‘adjust the theoretical formulae’ to improve the foul water capacity (discharge rates into the local river). Notably “without changing the physical capacity of the input system” this approach is totally unethical and practically unworkable. Thus failing to meet the needs of section 74 of the NPPF as no site within Guildford is deliverable due to lack of foul water infrastructure provision by the Water Undertaker. The Water Undertaker has made no budget provision in the borough to update and modernise the currently overloaded system, thus making the plan unsound in respect of future planning for Infrastructure; Waste water.

[As the Water Undertaker is a PLC there is legal questions as the ethical approach to the LPA providing public finance for a PLC – who are already being paid to provide that very service - under legal obligations as defined within the relevant Water Industries Act.] “If the private sector is unwilling to lend or invest in a venture perceived by to be uneivable or unsound should not the public sector get the message and keep away?” [Alec Samuels Barrister former leader of Southampton City Council]

Noting the discharge capacity referred to and allocated by the DoE is not the same as the physical pipe capacity to the treatment works or the Treatment works incoming capacity to handle additional ‘permitted’ discharge into the local river. The 4,000 home capacity listed above being pipe and treatment works capacity identified in 2015 by Thames Water PLC.

Thus the Local Plan in practical terms is unsound as no proposal in this Plan provides for such rapid upgrade to the water infrastructure. We note that Thames Water on the 3rd September released its business plan for the 2020 - 2025 period which did not include financial provision, in fact specifically excluded financing, for any new capacity pertaining to Guildford. While Martin Grant was informed in 1980’s that Pipes through Burpham were running at 4 Dry weather flow when the then design capacity should be 6 DWF. This referred to a 3km length of Main sewer.

Since my submission to the EiP. Information in respect of foul water further problems have been reported.

- Ockham – Constant raw sewage in road to Wisley and ‘tankering out’ due to lack of capacity at Wisley
- West Horsley - sewer collapse road, closed for multiple months,
- Burpham - blocked for 33 days TW had not lifted a main sewer line, manhole for 40 plus years
- AA roundabout – Collapse of main sewer
- Dapdunne Wharf – Blocked sewer
- Fairlands adjacent common Blocked

The Sewer system of Guildford is estimated to have been install in the 1890’s and little has been done in respect of pipe work since. It is running pipe work which is well over design capacity and the introduction of even the 5,800 homes onto the system will simple overload it. Any attempt to impose housing numbers without a consolidated program of Sewer pipe replacement throughout the Borough – for which Thames Water has no budget for – makes the plan unsound.

Futher information can be found at the following link [https://www.getsurrey.co.uk/news/surreynews/guildford-council-bear-full-cost-15122956]

Please also note, in practical terms the enlargement of pipe sizes for additional capacity takes three years and increase of treatment capacity takes five to ten years. Thus the Local Plan cannot be considered sound, as the water infrastructure simply cannot be upgraded within the five year land supply requirement window.
Page 5: Para 4.1.9ac Table S2b Sources of Supply

We welcome the reduction in the housing figure on Gosden Hill. However this in isolation does not in itself give reassurance that a defendable Green Belt boundary can be achieved. It is unclear whether the site allocation boundary will be amended to reflect the housing reduction on this site. Considering the reduced Housing number detailed below – this site could easily be removed without detriment to the Objectively assessed housing need in Guildford.

Page 6: Para 4.1.10

We support the spread of 'alleged demand' for housing over the life of the Plan (The Liverpool Method) as this will give Woking additional time to reappraise their true ability to absorb their own objectively assessed needs. We note that Woking have not expressed any concern about their sewer capacities. Exceptional circumstances exist in respect of water infrastructure in Guildford Borough, but similar circumstances do not exist within Woking.

Further to the HMSO release on housing need figures September 20th 2018 – the number is now down to approximately 402 from 672 per annum, yet now with the 5 year supply included, over 3,000 additional houses have been added to the allocation topping 15,000 all bar 50 in the Green Belt. In reality over 40% of the Green Belt allocation could be removed, which equates to at least one of the strategic sites: A25: Gosden Hill is the site which requires most ‘off site’ infrastructure work to make it sound, deliverable, sustainable and viable – noting if a road tunnel is accepted as necessary under Guildford, this site should be protected in any respect. Currently there is a gross over supplying of the housing need.

Further, this Plan makes no mention of the fact that the water treatment across the borough is lacking in capacity. We remain concerned that the Plan pays little regard to infrastructure provision and its timely delivery by other agencies Surrey, Highways England, Thames Water, National Grid (both Gas and Electric).

Page 7: Monitoring Indicators.

These plots identified as 'traveller plots' make no mention of these travellers 'departing' to allow others to travel and depart. It is implied that these pitches are for permanent occupants, thus the problem of traveller incursions elsewhere will remain unmitigated. The policy should include 'time limited plots’, to ensure that there is a regular turnover of occupants to make pitches available to other travellers. We are concerned that the indicator seeks to make provision for groups of ‘unknown planning status’. This is an extremely wide definition which would be open to abuse and should be removed.

Attached documents:

Comment: MM23 - LPMM18/1225  Respondent: Jim Allen 20674913  Agent:

Page 37: D4; Character and Design of New Development.

Disagree with removal of this policy - it leaves the door open for inadequate low quality design with no consideration to quality of life of the residents.

Attached documents:

Comment: MM24 - LPMM18/1224  Respondent: Jim Allen 20674913  Agent:

Page 33: Policy D2; Sustainable Design, Construction and Energy.
The amendment should include ‘With care taken to ensure sufficient water is provided to flush sewers, too great a reduction in water usage will result in blocked sewers’. This number (volume of water) is an unknown but in Germany this was reported in 2012.

Note: [https://www.theguardian.com/commentisfree/2012/apr/18/german-toilet-flushing-waterconservation](https://www.theguardian.com/commentisfree/2012/apr/18/german-toilet-flushing-waterconservation)

“While Britain frets about the drought, Germany can't get enough of saving water. Germans are good at saving water, so good in fact that they have created a problem for their canalisation system: many pipes are clogged with grease, excrement and leftovers because they aren't being flushed sufficiently with water. Especially in the summer, gutters in German cities can reek horribly. In some parts of the country, water suppliers even have to flush their pipes artificially with hundreds of thousands of litres of water.”

Attached documents:

**Comment:** MM26 - LPMM18/1226  **Respondent:** Jim Allen 20674913  **Agent:**

**Page 39: Policy ID1:**

Para (4): The wording of 'should' needs to be changed to "shall be used to secure the provision of infrastructure" currently this leaves the door open for inadequate infrastructure supply. Note; failed infrastructure supply has occurred at Cranleigh (Waverley Local Plan). Which had the houses built on appeal without the upgraded off site infrastructure.

Para (5a to 8): Will they consider the site unviable/ unsustainable or will they supply the money for the infrastructure? This paragraph should be enhanced by specifying open book and specifically requiring the need to seek the opinion of an independent financial viability specialist.

**Page 40: Reasoned Justification**

This is car free modal shift proposals are utter nonsense devoid of reality; 45,000 additional vehicles are calculated (via census date people to car ownership numbers) to enter the HMA over the life of the plan - Starting a site adjacent the A3, prior to the A3 solution being provided is irrational madness, as there will be, as occurred before elsewhere planning creep, “just a few more, just a few more”, and still no action, currently the schedule of Roads improvements are:

- Smart motorway M25. On site work expected 2020  
  “From HE website: Why we need this scheme; The M25 junction 10/A3 Wisley interchange has been identified for improvements as it experiences heavy congestion on a daily basis. This causes queues and prevents access from Ockham Park junction (A3) to the M25 junction 10 and on to Painshill junction (A3) in both directions. A similar problem is experienced by traffic entering and exiting the M25 junction 10/A3 Wisley interchange.”
- The J10 project is currently some six months delayed in an 18 month time window.
- When J10 is completed the ‘assessment’ of the A3 between A320 - A31 will start, noting there are no planned improvements identified as of 14th October 2018 on the HE web site.
- The A3 - J10 to A320, is not even mentioned in ‘notes’ thus it is conceivable that Gosden Hill road access to the A3 nor the A247 North facing slips will not occur before 2035. Thus this A3 adjacent site will be unsustainable and is unsound with reference to its offsite infrastructure (Roads) unless Highways England step up their game - this site will be unsustainable and Unsound for another 30 plus years.

Alternative transport measures are not defined. However we note the admitted need for flexibility to review and amend the plan at the earliest opportunity once these issues have formerly recognised by the transport and water stake holders.

**Conclusion:**

While the amendments are welcomed in broad general terms – The Strategic polices (noting the missing Town Centre as a strategic classification) results in an overall failure to supply a positive requirement for (b) transport infrastructure...
waste water and fails (d) to conserve and enhance the natural environment taking both Green Belt and ANOB merely ad
hoc mitigation as opposed to providing readily available ‘Solutions’ to all problems created by this plan.

I find it disappointing that Thames Water has not been honest in respect of capacity in Local Plan documents, and future
timing of upgrades to the sewer systems. Their true knowledge of the systems considering they took them over 40 plus
years ago is as if they only took over last month. This lack of knowledge which has proved catastrophic in recent months
in the Borough has led to:

1. Four sewer collapses.
2. Two catastrophic blockages and numerous smaller ones.
3. Engineers are unaware of the pipe diameters components within the system.

I believe Thames Water area manager or above should be called to the EiP in person so they can be questioned as to the
viability of the Housing number proposals.

GBC are not apparently aware of their own historic statements on the subject. choosing to ignore serious problems down
playing them to a level bordering on
negligence. The Moorfields ‘improvements’ delayed for 15 years While GBC attempt to convince TW to move when
they don’t want to, and still no further advance other than clear demonstration that Thames Water PLC has no intention
paying for any move to a different location. The upgrading will never happen until a ‘final’ political decision is made as
to ‘move’ or ‘stay where it is’, at least ten years into the future. In respect of traffic infrastructure, poorly assessed road
needs, inaccurate statistics and ‘very long term upgrades’ to the A3, not in reality occurring within the life of the plan
between J10 and the A320 displays such distinct lack of cooperation by SCC and HE that it can be no longer called
‘cooperation’. Both Surrey Country council head of Roads and Highways England should be called to the EiP to display
their true intentions and time scales. Much as everything in this Local Plan; ‘cooperation’ has an unusual non-standard
definition of ‘informative’ and serious ongoing flat batteries in the hearing aids of the Guildford Planners in respect of
responses from the community.

Their attitude is they ‘tell’ people what they are going to do, and when people point out any errors, they use the unspoken
Americanism “Taken under advisement” the standard response to the community who request or advises the council to do
something when the council never had or has no intention of doing anything!

This means this plan is totally unsound and cannot be made so by default of outside bodies controlling infrastructure and
failing to act in a cohesive manner most probably due to a deliberate policy of ignoring advice from all quarters.

So, as the exceptional circumstance of sewers and roads exceeding design capacity and those responsible hiding their
heads in the sand, mean none of ‘X’ number homes can be built with causing the contravention of para 92 (c) of the 2018
NPPF (sic) “ Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the
communities ability to meet its daily need”. For sewers will flood the streets (as is already occurring Ockham, West
Clandon and Guildford Town Centre) and cars will remain stationary on all roads (also already occurring due to failed
infrastructure.)

I end with a formally request that the EiP is reopened to allow myself and other interested parties to revisit the Housing
numbers as promised on day 3 session 3 and subsequent removal of the oversupply of sites and undersupply of
infrastructure in public session.
This is car free modal shift proposals are utter nonsense devoid of reality; 45,000 additional vehicles are calculated (via census date people to car ownership numbers) to enter the HMA over the life of the plan - Starting a site adjacent the A3, prior to the A3 solution being provided is irrational madness, as there will be, as occurred before elsewhere planning creep, “just a few more, just a few more”, and still no action, currently the schedule of Roads improvements are:

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Alternative transport measures are not defined. However we note the admitted need for flexibility to review and amend the plan at the earliest opportunity once these issues have formerly recognised by the transport and water stake holders.

**Conclusion:**

While the amendments are welcomed in broad general terms – The Strategic polices (noting the missing Town Centre as a strategic classification) results in an overall failure to supply a positive requirement for (b) transport infrastructure... waste water and fails (d) to conserve and enhance the natural environment taking both Green Belt and ANOB merely ad hoc mitigation as opposed to providing readily available ‘Solutions’ to all problems created by this plan.

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Their attitude is they ‘tell’ people what they are going to do, and when people point out any errors, they use the unspoken Americanism “Taken under advisement” the standard response to the community who request or advises the council to do something when the council never had or has no intention of doing anything!

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Clandon and Guildford Town Centre) and cars will remain stationary on all roads (also already occurring due to failed infrastructure.)

I end with a formally request that the EiP is reopened to allow myself and other interested parties to revisit the Housing numbers as promised on day 3 session 3 and subsequent removal of the oversupply of sites and undersupply of infrastructure in public session.

Attached documents:

Comment: MM28 - LPMM18/1227  Respondent: Jim Allen 20674913  Agent:

Page 41: Policy ID3 Sustainable transport for new developments

1. Policy Para’s (4) and (5) (a)
This should simply be all vehicles for new developments must be parked off the 'adopted highways' so when the highway is to be adopted in the future parking must be off road.

2. Para 4.6.24a:
'Car free' housing is simply unsustainable. Provision 'somewhere' should be made for all homes to have private transport’. Stored off road and within Walking distance (disability discrimination, if no parking provided)

3. Para 4.6.24ba to 4.6.24e
Put simply, the developer must provide adequate parking for the expected needs via underground parking, or 'lift' parking where the car is parked inside a cellar via a lift mechanism.

Note: You previously raised this proposal that refusing to issue new parking permits to new homes is in fact illegal under current legislation.

Attached documents:

Comment: MM29 - LPMM18/1228  Respondent: Jim Allen 20674913  Agent:

Page 42: Policy ID4; Green Blue Infrastructure

1. Policy Para (1) and (2)
"Where appropriate" is a get out clause for doing nothing and should be removed. This wording is mitigation at its worst Solutions should be at the forefront of all policies and their cause and effect on the existing and future community

Attached documents:

Comment: MM3 - LPMM18/1219  Respondent: Jim Allen 20674913  Agent:
Page 9: Policy S3; Delivery of development and regeneration within Guildford Town Centre.

I support the general thrust of this policy as it supports a ‘Town Centre first’ approach but am surprised that only 50 additional homes could be found (White Lion Walk) as this fails to meet you’re requirement to make greater use of the town centre for residential use. The further incursions into the Green Belt elsewhere in the Plan are even less justified when viewed in the context of not maximising residential potential in the urban area.

Uncertainty in the retail industry continues and I maintain that the Guildford town centre area, in particular the North Street Development site, be revisited to increase the ratio of homes to retail and entertainment. In that regard this policy is too vague to be effective.

Page 10: 4.1.19 Town centre regeneration

This Plan makes no infrastructure provision for bypassing the town centre, particularly as Guildford is a gap town. (g) is not viable or sustainable as people need to cross through, not simply stop, on the outskirts. Given the lack major external roads infrastructure in the Plan to deal with this issue I believe the deletion of point (g) should occur.

Page 10: 4.1.21 Town centre regeneration

Considering the destruction of Guildford’s Green Belt for unneeded housing plots, while contrary to the NPPF which makes no provision for such a policy I believe there should be a policy which specifically states “A site is consider to remain under the umbrella of the Green Belt definition until that particular site has been developed and should remain within the Green Belt, should it be found at the next Plan revision, that there is over supply of housing land. Thus providing provision within this, to remove strategic Green Belt sites from the Plan if town centre sites produce sufficient houses. E.g. if 500 sites are found in the town centre or on other sites, then 500 should be removed from the Green Belt allocation as exceptional circumstances cease to exist for changing the Green Belt line at that location. While this proposal is slightly outside the current ‘National Policy document’ there are now exceptional circumstances to ensure housing numbers when reduced reflect the communities wishes and the community is not left with the unnecessary loss of Green Belt and Countryside.

Page 11: Monitoring Indicators

Only 50 homes allocate has been as a result of your comment ‘to find housing in the town centre.’...... This is not acceptable; there should be a target as much of the concern at examination related to lack of ambition regarding housing provision in the town centre.

Attached documents:

Comment: MM32 - LPMM18/1235  Respondent: Jim Allen 20674913  Agent:

Page 44: Site Allocations summary Table

1. Row A60

You said the plan must look to the town centre for more housing just 50 extra shows a distinct lack of enthusiasm to do this, as all other additional sites are within the existing Green Belt.

Page 45 Policy A60 White Lion Walk

I welcome the use of urban land for residential; however, this site is currently an active retail site and would result in lost employment and retail space although not all are occupied - as for car free site - if redevelopment is to occur, it is quite feasible to make an underground car park and delivery are for the stores. This is not viable in the first five years.
Page 46 Policy A24: SARP
Justification of removal of Policy A24 Slyfield regeneration (in its current format)

The project is currently publically declared [public works loan?] cost over £100 Million to the Local Council simply to move the foul water treatment works, which is the responsibility of Thames Water PLC and OFWAT to approve the move. TW PLC has signed a Water Undertakers agreement with the Government to provide such services that are needed for the Community. After 15 years of one sided discussion, nothing has been achieved, due to the company clearly implying by its reluctance to become involved, in all that time, that the move is not to be encouraged. The proposed new site is beset with technical difficulties including Methane release, land instability and organic contamination over 4 metres deep, and cost versus Engineering and cleansing of the site is not a commercially viable proposition. Total estimated cost of £350 Million. Thus the project needs revisiting with a preference for commercial use not Residential. Removing the need for the Burnt Common release of Green Belt for industrial use.

Slyfield is not a commercially viable site and no finance has been provided for its clearance and re-use. It is thus unsustainable and highly unlikely to proceed past May of next year. (Date of the next local elections local Council)

The current site is essential for the New Sewage treatment plant / transfer station and as all sites are dependent on this site. A more practical and rational approach should be taken as to its future use.

• When an engineer says it isn’t sensible, there are good practical reasons not to do it! Level of difficulty against end result.
• When an accountant says it’s not viable after 15 years of talking and accounting, then it means it is not commercial / financially viable, acknowledged by the Council Planners at the EiP.
• When a chemist says its contaminated, it will be – don’t pick it up or eat it! Waste settlement tanks and household waste sites are ‘naturally contaminated– they do not have the same contamination level as a farmer’s field built on in 1908!, despite what the council reports claim to the contrary.

• When an Accountant, Chemist and an Engineer say it isn’t viable – its time the Politician realised he does not know what he’s doing!

“This is the state of play of this proposal after 15 years everyone with practical experience says ‘ do not do it’ in their own technical languages. This plan singularly fails to realise this. If it [the movement of the treatment plant] does not go ahead, then there is no waste water treatment capacity for the Local Plan and the water undertaker is clearly refusing to cooperate in its move. You (the council) pay for and design the move and the council does not have the expertise to actually plan such a move nor the finance to pay for it. We [TW PLC] do not want anything to do with it [The Move].
Until this move is stopped then and only then will Thames Water fulfil its statutory obligations to provide adequate capacity for the final number of homes.”

As the council claim it is not commercially viable, I have been looking at the proposed numbers, if borrowing £100,million to facilitate SARP is non commercial but none the less a rational approach to this site. The maths are 1,500 homes, average cost when sold £250,000 total value of homes £375,million, Suggesting a smart profit of £250,million after the cost of moving and clean up – yet Thames Water PLC, GBC and outside finance say it is not commercially viable – Which strongly suggests we are not being told the full truth..... about the implications of the move and cleanup such that £250 million will be absorbed by ‘expected events’ most probably additional site cleanup? suggesting each home will in effect cost a staggering £416,666 to build including the site clean-up cost, when the average homes sale
value is just half that figure. If all homes were rented out at £1,000 per month the £375 million would take 20 years to recoup... noting if they are sold off at a discount this year period rapidly extends. Noting 40% of these homes are meant to be low cost homes.

The use of this site for housing and proposal to move the treatment plant is summed up by Alec Samuels, Barrister and former leader of Southampton City Council when discussing council lending in general “If the private sector is unwilling to lend or invest in a venture perceived by to be unviable or unsound should not the public sector get the message and keep away?” This site falls into this category.

Transport Strategy:

There is not a rational defined entrance to this site after 15 years on the drawing board, let alone an internal design, A proper safe guarded entrance should be included and identified through/ via the Bellfield’s roundabout......within the plan policy should this site move forward in its present guise.

Attached documents:

Comment: MM35 - LPMM18/1237 Respondent: Jim Allen 20674913 Agent:

Page 47 Policy A25: Gosden Hill Farm, Merrow Lane, Guildford

Justification for the Removal of Policy A25:

I would put to you that Gosden Hill should be removed for the following reasons;

- Its infrastructure has already been deemed inadequate in 1980’s and
- Has been rejected in every Local Plan including the regional Southeast Plan.
- Has been denied on two appeals
- Further the traffic proposals have not been fully explored or documented unlike the other two sites and
- No provision for a second exit to be provided or agreed with the local communities
- It only has provision for two right turns to gain North bound access to the J10 A3 M25 while blocking the narrow (single lane) exit ~ London Road ~ from North Guildford.
- Relying on a South side slip and to two undocumented North facing slips on the A247 dependant on the Wisley development is simply unsustainable.
- In respect to other points to be considered:
  - safeguard land for a future A3 tunnel entrance
  - reduce extra traffic along the chronically over-used London Road
  - avoid the Epsom Road seizing up
  - protect the strategic and highly visible Green Belt gap on the London side of Guildford
  - acknowledge that there is insufficient space for an effective sustainable movement corridor
  - preserve the ancient woodland in its landscape setting
  - the loss of so much Green Belt can no longer be justified.

- This also fails to take into account section 95 of the NPPF(2018) which requires consideration of National Security; which requires the Local Plan to include appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and
ensure public safety and security. Introduction of two right turns effectively turning off Fire Ambulance police and security services access to the A3 north bound is contrary to the above section.

- The current width of roads through the Burpham community without destruction of existing buildings and substantial modifications to many road layouts to meet current and predicted demands of the Clay Lane slip road and New Inn Lane to Merrow means any security vehicles will simply be delayed and or held up.
- Noting the worst case to date was when a vehicle overturned south bound A3 by the university and the recovery vehicle took three hours to arrive due to the weight of traffic which tailed back to Ockham. In a security situation such a scenario is untenable. While traffic light failure over the past 24 hours at the A320 has led to a tail back of six miles from 07:00 to 10:30 today.

**Not withstand the lack of need of this site to meet OAN requirements:**
I welcome the reduction on the numbers on this site, not withstanding our concerns regarding this allocation, which could be removed due to the gross over supply of housing plots compared with the predicted reduction in OAN. The plan needs to be consistent through as to whether it is referring to housing delivery numbers within the plan period or as a whole.

**Policy Box, Transport strategy and other infrastructure**

The transport strategy is fundamentally unsustainable -

(2) This description suggests an all-ways junction onto the A247 - The location is too far north of its required location, thus is a nonsensical. The junction is required south west of the A247, not on the A247 - this is a cost saving mitigation, not a practical solution proposal – Lacking in basic planning credentials and traffic modelling.

(4) The Sustainable movement corridor is yet to be proven viable or sustainable the London Road in Burpham is singularly impassable with no ability to find additional road width. The delaying private vehicles in preference to public transport vehicles is unsustainable due to cost and location of destinations of local residents. The proposed park and ride buses (which do not ‘stop on route’) proposal should be using the A3 to access the town centre via the A320 Stoke Road intersection and returning the same way, through an all-ways to the north of the site at Potters Lane. Note: this on A3 Park and Ride route would not be viable via the A247 as this will increase the return journey by several miles, thus would render park and ride time inefficient

(5) The provision of 'new' bus services into this area is totally impractical when local bus services have been cut 'due to congestion’ within Burpham housing estates.

(6) The site is not ‘walking’ distance from anywhere on a cold winters night and highly dangerous for cyclists due to weight of traffic. The site assessment document was criticised for its poor methodology on this site when first placed out for public consultation yet again a notification of a documents existance not a consultation –No actual and identifiable reassessment or this documents errors were taken of these observations.

(7) This station was described in the 1980's by Guildford Borough Council during their appeal objection to using this site for housing, as a ‘route’ to making the estate a dormitory village, for London, physically separate from Guildford, and not providing housing for the local residents of Guildford the requirement for the Local Plan. Nothing has changed to suggest any other use.

(8) Clearly the impacts off site are considerable, if only ‘mitigation’ is available over a real solution to solve the expected problems this will make this site unsustainable and unsound in all its formats.

**Page 48: Policy A25; Other Infrastructure**

(14) Poorly worded this should read “run-off does not exceed current average rates any additional rates of runoff should be controlled by balancing ponds to ensure this rate is not exceeded during times of high rainfall or flooding causing flooding downstream.”

(25) We welcome the additional landscaping buffer requirement between Gosden Hill and the A3. However this could be enhanced further with the addition a commitment “to have regard to the cumulative visual impact of all new site allocations along this section of the A3”
(28) Should include the words "without using the back country lane known as "Merrow Lane" and "New Inn Lane" as routes to and from this site by non pedestrians.

**Page 49: Policy A25; Box Opportunities**

(3) This route should specify ‘leaving the site at the proposed new Railway station and reaching the A25 without interfering and connecting with local traffic on Merrow or Park Lane.’ (similar to the expanded Blackwell farm Exit onto a main road.)

(6) This proposal clearly acknowledges the justified need for an ‘all-ways Junction’ to the London side of the Gosden Hill site as proposed in the 1980’s failed appeal application on this site. A fact denied by both SCC and Highways England in their limited submissions using uneducated and untested assumptions. The acknowledgment of the requirement I welcome. However the position of the overall layout fails to provide a ‘realistic practical solution’ as opposed to a ‘very poor mitigation’ to the known problem. The five way (all-ways) should be closer to Potters lane forming a ‘tight layout’ ‘always’ (five points of interchange) junction serving both Gosden Hill and the Industrial site at Burnt common it is simply too close to the M25 and should be south of the A247 not part of the A247.

2. *Row A25*

This number is underscored at 1,800 while previously it has been reduced to 1,700,.this is inconsistent with earlier references the correct number is 1,700 within the plan period. Noting this site could be removed if the housing number is corrected to the current predicted level. Further the boundary (land taken from the Green Belt should be reduced to reflect the reduction in Housing Plots.

**Attached documents:**

**Comment: MM37 - LPMM18/1238  Respondent: Jim Allen 20674913   Agent:**

**Page 49: Policy A26a Land access road between A31 Blackwell Farm, Hogs Back, Guildford**

This policy shows clear thought pattern on roads and requirements. Unlike policy A25 which is devoid of even the basics rationality. A new Policy A25a should provide a rear exit route policy from Gosden Hill Site and should cover a route to the A25 from the Gosden Hill Site onto the Park and ride Roundabout at Merrow via the proposed Merrow Railway Station (underpass?). Thus joining both park and rides and their bus services.

**Attached documents:**

**Comment: MM39 - LPMM18/1231  Respondent: Jim Allen 20674913   Agent:**

3. *Rows A61 – A64*

We note all these sites are further releases of Green Belt lands rather than finding increased capacity in Town Centre sites... this akin to one year’s supply not five years supply (3,520) - noting lack of sewer capacity at just 325 houses in total..

**Attached documents:**
Policy box requirements (3)

(3) There is a clear and obvious requirement for south facing slips at this location to allow this development to access Guildford. No safe guarded land has been provided for such provision, thus until it is, again claimed as not required by HE and SCC yet as this proposal remains untried or tested via modelling this site is unsustainable. Noting this requirement is also required for the RHS Gardens expansion, thus a new policy is required (A35a) safe guarding land south of the Ockham Roundabout (13a) There is no spare foul water capacity for this site at Ripley. this should read this site is unsustainable until Ripley Treatment works is upgraded.

Attached documents:

3. Rows A61 – A64
We note all these sites are further releases of Green Belt lands rather than finding increased capacity in Town Centre sites... this akin to one year’s supply not five years supply (3,520) - noting lack of sewer capacity at just 325 houses in total..

Attached documents:
**Page 13: Policy H2; Affordable Homes**

(2) I support the uplifting of the threshold to 10, this allows more flexibility for affordable units on site.

(4) This is a positive move forward but steps must be put in place to ensure that strong legal boundaries are included to provide the legal tools to planning enforcement to ensure no deviation.

**Attached documents:**

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**Comment: MM7 - LPMM18/1221  Respondent: Jim Allen 20674913  Agent:**

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**Page 15: Policy H3; Rural Exception Homes**

The wording leaves Green Belt open to 'technical deviation from intent by travellers. It also introduces market housing in rural exception sites for the first time.

We note this amendment is in reference to the new revised NPPF of July 2018 therefore the whole plan must comply with the new Policy document. Thus the requirement of a currently missing statement of common ground taking housing numbers from Woking is significant in making the Plan unsound.

**Attached documents:**

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**Comment: MM9 - LPMM18/1222  Respondent: Jim Allen 20674913  Agent:**

---

**Page 16: Policy P2; Green Belt**

(2) This should identify the current (2018) NPPF.

**Green Belt Limited Infilling**

This is very dangerous and destroys the inset village line before it is agreed - the inset village boundary should include all potential eventualities of such a challenge, such that no challenge can ever be valid. This statement opens up the whole of the Green Belt around a village, ‘infill’ is not specifically defined within the NPPF thus has an ‘open’ definition. Using the argument ‘a barrister will sort out the challenges’ is a cop out – if the policy is written correctly no Barrister would need to be engaged

The village / inset boundaries should be comprehensively thought through, as to make this wording redundant.

**Attached documents:**

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**Comment: MM45 - LPMM18/1218  Respondent: Richard Cheeseman 20675137  Agent:**

The current infrastructure provision for the area does not support the addition of so many new dwellings.

**Attached documents:**

The excessive increase in cars with resulting extensive delays, gridlock, noise and nitrous dioxide pollution have not been properly assessed.

Attached documents:

Comment: MM41 - LPMM18/1266  Respondent: Alstair Haxton 20676417  Agent: MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The following are my objections to the proposals for development around Send and Send Marsh

MM41 Land at Garlicks Arch, Send Marsh, Policy A43

The villages of Send and Ripley will no longer be separate, due to this proposed over development.

The 37% increase in houses is excessive and previous objections to a lesser number have been ignored, The increase in cars will block already busy roads, there are no school places as the local school in Ripley has already closed, and the GP surgery is already under excessive strain

Attached documents:


The excessive increase in cars with resulting extensive delays, gridlock, noise and nitrous dioxide pollution have not been properly assessed.

Attached documents:


The Employment Land Needs Assessment show the need for industrial land has reduced, as shown by unused industrial sites at Slyfield, and combined with a 25% increase at Send Business Centre, it makes this type of development unnecessary. With Send Business Centre it makes a concentrated increase in Send village which is not proposed in any other village and causes an excessive increase in traffic.

It is also on Green Belt land

Attached documents:

The excessive increase in cars with resulting extensive delays, gridlock, noise and nitrous dioxide pollution have not been properly assessed.

Attached documents:

Comment: MM44 - LPMM18/1268  Respondent: Alstair Haxton 20676417  Agent: MM44 Land at Alderton’s Farm, Policy A63

The Garlicks Arch, Clockbarn and Winds Ridge developments will increase the number of houses by 45% with already insufficient infrastructure for the current 1700 homes in Send. The subsequent increase in traffic will block the roads and Send crossroads. This Green Belt land and heritage centres at Send Marsh Green will be affected.

Attached documents:


The excessive increase in cars with resulting extensive delays, gridlock, noise and nitrous dioxide pollution have not been properly assessed.

Attached documents:

Comment: MM9 - LPMM18/1269  Respondent: Alstair Haxton 20676417  Agent: MM9 Green Belt Policy

The Green Belt will no longer be protected leading to more development, not less, as the policy would now be open to abuse and misinterpretation.

Attached documents:

Comment: MM45 - LPMM18/1303  Respondent: Mrs Steph Pryke 20676513  Agent:
As a parent with young children it is a major concern that we will struggle to find places for our children in secondary school especially with the housing developments currently going ahead in Ash/Tongham. For a village where most people can walk to the local primary school it is very worrying that we could be driving quite a distance to a secondary school that will have enough places.

The old narrow pavement along the main road is already a treacherous route for walkers due to speeding drivers and inadequate pedestrian crossings, especially by the school. The increase in traffic from a large housing development will only increase this danger.

**Attached documents:**

**Comment:** MM45 - LPMM18/1305  **Respondent:** Mrs Christine Endacott-Palmer 20676865  **Agent:**

Main Modification 45, MM45, dealing with Policy A64.

Whilst I understand and agree with the need for more houses in the area, in particular affordable housing, this should wherever possible be on Brown Field land or in existing housing developments, not within the Green Belt. Green Belt land should whenever possible be preserved.

There is considerable unused housing and land once used by The Army around the Aldershot area - this should be fully exhausted, along with land (I believe to be owned by GBC) off the A3 on the Ripley side of Guildford, and land on the flood plain in this area (using techniques perfected by the Dutch), before considering building on Green Belt land.

Any and all plans MUST satisfactorily address the infrastructure - so even Brown Field and land already used for housing requires consideration of the infrastructure requirements and improvements that are often required.

There are no proposals to improve the infrastructure with this plan.

The junctions of Glaziers Lane and Westwood Lane (at Wyke) and the A323 Guildford Aldershot Road; Wyke Lane and Flexford Road / Westwood Lane; the junctions onto and off the A31 Hogs Back at Puttenham, Wanborough Hill and the B3000 (which is often queued almost end to end between there and the A3 at Compton) are all currently woefully inadequate and often dangerous with no active traffic management systems (lights, roundabouts, etc).

The hump-backed bridge over the railway line at Wanborough is even now dangerous and would be considerably more so with additional traffic leading off Glaziers Lane nearby.

The sewerage system currently struggles to cope.

The platform of the railway station at Wanborough is too small and could not cope with any additional use (in rush hour even now it is dangerous).

There are no shops in Normandy and the nearest shopping being Ash Vale (limited), Guildford or Aldershot which would add to the already over busy A323 - especially in rush hour and any time a train stops at Ash - in evening rush hour the queue to get through this area can lead back to the start of Normandy (Guildford side).

There is inadequate provision of schools in the area (primary and more so secondary) and public transportation is too expensive and limited so parents add to congestion and pollution by taking their children to school.

The broadband also struggles to cope at the peripheries of the Puttenham exchange - 105 additional houses would result in a degradation of service to all further downstream users.

This is not about NIMBY - it is about preventing building on Green Belt land and ensuring the infrastructure improvements are adequately taken care of before building commences.
The site of Vokes on the A324 required the construction of a large roundabout at the entrance/exit of the site during the redevelopment some years ago - the same rules should apply to any substantial housing developments, whether on existing housing land or Brown Field.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/1698</th>
<th><strong>Respondent:</strong> Mr Alan Sussex 20687457</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>To The Planning Policy Team, Guildford Borough Council.</td>
<td>As a resident of Send, I object to the excessive increases proposed since the last public examination.</td>
<td></td>
</tr>
<tr>
<td>I list below my detailed objections.</td>
<td>MM41 Land at Garlicks Arch, Policy A43</td>
<td></td>
</tr>
<tr>
<td>The Proposed 37% increase in the number of houses to be built is excessive and will further increase</td>
<td>All the complexities on local infrastructures.</td>
<td></td>
</tr>
<tr>
<td>The land required will destroy more of the magnificent woodland.</td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/1699</th>
<th><strong>Respondent:</strong> Mr Alan Sussex 20687457</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>MM42 Land at Burnt Common London Rd, Send Policy A58</td>
<td>The area of land proposed for this development has been increase twice since the 2014 plan.</td>
<td></td>
</tr>
<tr>
<td>Any further increase is outrageous within the Green Belt, when there is unused land at Slyfield.</td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>Comment: MM44 - LPMM18/1700</th>
<th><strong>Respondent:</strong> Mr Alan Sussex 20687457</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>MM44 Land at Alderton’s Farm, Send Marsh Rd, A63</td>
<td>Introducing a new site at this late stage ,I think is out of order, when it was left out previously, because of all the objections, at the Public Examination in July 2018.</td>
<td></td>
</tr>
<tr>
<td>I believe as a matter of openness this site should be deleted from the plans.</td>
<td>Once again infrastructure will not be adequate</td>
<td></td>
</tr>
</tbody>
</table>

**2109 of 2554**
I hope this long and protracted public examination will be completed with some notice being taken of all the objections made by Send residents.

It would appear that previous objections have led to yet more developments being imposed on Send.

**Attached documents:**

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**Comment:** MM41 - LPMM18/2631  **Respondent:** Mrs Molly Ness 20687489  **Agent:**

MM41. An increase to 550 (from 400 - why?) houses on land at Garlicks Arch, which is GREEN BELT woodland is over development. Contravenes MM9.

The site is prone to frequent flooding (the last few winters is testament to that fact) and school and medical facilities will be strained to breaking point (Ripley Junior School has closed - how clever was that??)

**Attached documents:**

---

**Comment:** MM42 - LPMM18/2630  **Respondent:** Mrs Molly Ness 20687489  **Agent:**

MM42. An industrial site on GREEN BELT - what idiot thought of that one? It would the biggest industrial allocation in any village in the borough (where the ELNA showed there is a reduction in demand for industrial land). It also contravenes MM9

**Attached documents:**

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**Comment:** MM44 - LPMM18/2629  **Respondent:** Mrs Molly Ness 20687489  **Agent:**

MM44. Again no thought given to heritage building, increased traffic (noise and pollution). GREEN BELT land contravening MM9.

How can any sane, fair minded Councillor who has visited Send on a regular basis, make this ridiculous decision to increase the population of the village by nearly HALF.

If any of you have taken the trouble to visit us you will know that the main road (Send Road) is very narrow - and used by many pedestrians (on equally narrow pavements which often have over-hanging hedges/branches making it difficult to keep to the pavements) and the traffic already is non-stop.

It also has mostly LANES leading from it. Is it the intention of the Council to compulsorily purchase land to widen these lanes? If so, more disruption and heart-ache for those having to give up their land/house.

There are now TWO schools adjacent to this busy main road -another brilliant decision by Guildford Council (closing the infant school in Bush Lane several years ago, which incidentally is now a lovely green PARK?? - which no-one can access by the way!!) Why didn't you put both schools on that site? One can't help thinking there is some sort of ‘deal’ going on as this would be a prime building site for the Luxury House Developer.
The Medical Centre is brilliant but I tried to make an appointment for a non urgent appointment recently and was given a date for THREE weeks later! I'm sure that was a quick appointment - others take much longer. How long am I going to have to wait when the population of this VILLAGE is the size of a new TOWN?

I strongly OBJECT to all these decisions made by an obviously incompetent Council who have no concern at all of the impact all these extra houses, cars, pollution and people will have on the existing residents.

Why do you never consider our QUALITY of life

I have a prediction - there will be no villages in England in thirty years time!! How sad will that be - SO MUCH FOR THE CONSERVATIVE PLEDGE (IN THEIR MANIFESTO) TO GIVE THE PEOPLE CHOICE!!

I chose to live in a village!

I have always voted Conservative, both nationally and locally- NO MORE!

Attached documents:

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Comment: MM9 - LPMM18/2309  Respondent: Mr David Willis 20688449  Agent:

Re: Guildford Modified Local Plan

MM9 Worplesdon is in the Green Belt, is an historic village with extensive Conservation Area and Special Protection Area with protected species in danger of extinction, and a site of Special Scientific Interest. There has been no democratic consultation surrounding the sudden, disingenuous, inclusion in the modified local plan. Please, therefore, exclude it.

Furthermore, we understand that the number of houses allegedly required is now less than the number assumed in the development plan.

We urge to full use of brownfield sites rather than encroach on rural villages or take green bank land.

Attached documents:

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Comment: MM41 - LPMM18/2398  Respondent: Mrs Eleanor Ayers 20688481  Agent:

An increase in the number of new homes from 400 to 550 is excessive. It is Green belt and ancient woodland. The local roads cannot cope with more cars. The houses will be next to the A3:and subject to air pollution. This over development is very unfair on one small village.

Attached documents:

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Comment: MM42 - LPMM18/2399  Respondent: Mrs Eleanor Ayers 20688481  Agent:
MM42
This industrial area has been doubled even though there is unused capacity at Slyfield. It will cause air pollution and road congestion.

Attached documents:

Comment: MM44 - LPMM18/2400  Respondent: Mrs Eleanor Ayers 20688481  Agent:

MM44
This has already been deleted from an earlier version because of all the objections. It is Green Belt and on a busy minor road. With other developments it adds 770 houses to the total of 1700 too much for one village.

Attached documents:

Comment: MM9 - LPMM18/2401  Respondent: Mrs Eleanor Ayers 20688481  Agent:

MM9
Our Green Belt is precious, it protects us from air pollution. Send is a rural village not an urban centre. Development should not increase the size of the village.

Attached documents:

Comment: MM12 - LPMM18/1342  Respondent: Mrs Janet Ashton 20689281  Agent:

MM12
It would appear there has been a major collapse of statutory bodies such as Natural England. In view of this, and the speed in which mass extinction of species is taking place, The Thames Basin Heath Special Protection Area should be given full protection, without exception. It is vital to prevent any further assault on populations and ecosystems, else everything will cease to function. SANGs are no longer a viable option, species are priceless. Please abolish SANGs and close all loopholes.

Attached documents:

Comment: MM12 - LPMM18/1925  Respondent: Mrs Janet Ashton 20689281  Agent:

Dear Sir,

Re: Guildford’s Modified Local Plan - MM12, Policy P5: Thames Basin Heaths Special Protection Area
A recently leaked document from Natural England reveals they soon hope to be in a position to protect 37% of Sites of Special Scientific Interest (SSSI). This makes it clear they are no longer able to effectively monitor our nature conservation areas. As a result, it has become imperative to ensure as much as possible is done to ensure this role is most conscientiously and resolutely upheld at local government level.

However, currently in the Borough of Guildford a climate of economic assault has created an atmosphere of seeking out loopholes, eliminating obstacles to development. The notion of protection, and value of the ‘non-material,’ long forgotten. Natural England has become a tick box in the planning process, yet a body no longer able to provide credible evidence with which to justify development.

For example, where I live permission was recently granted to build luxury housing within the buffer zone of the Special Protection Area (SPA) and SSSI, land which is also Green Belt, a Conservation Area and Historic Setting. All in return for a few thousand pounds SANG. As you know, these areas are irreplaceable, of enormous value to the community and our wildlife, is priceless.

The problem is now of such magnitude that some ecosystems are ceasing to function and the basic foundations of life are under threat.

Please would you simplify this policy, perhaps by ruling out development which would adversely affect the SPA and SSSI over the next five years so wildlife and other endangered species have chance to recover? Please would you consider removing loopholes such as SANG, it is not a sustainable idea and has done much damage already.

Please would you use all that is within your power to help protect the Thames Basin Heaths SPA/SSSI.

Yours Faithfully

Janet Ashton

Attached documents:

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**Comment:** MM2 - LPMM18/1337  **Respondent:** Mrs Janet Ashton 20689281  **Agent:**

Most up to date housing need figures suggest these to be grossly exaggerated. Also, if Woking borough has a genuine housing need which is unmet, surely it can only be met in Woking itself.

**Attached documents:**

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**Comment:** MM2 - LPMM18/1930  **Respondent:** Mrs Janet Ashton 20689281  **Agent:**

Dear Sir,

Re: Guildford’s Modified Local Plan - MM2, Policy S2, Spatial Development Strategy.

The latest figures from the Office of National Statistics suggest that current housing numbers in the plan are grossly exaggerated and no longer form a sound basis on which to make decisions. It has been demonstrated that building 360 homes a year would support the ambitious economic growth proposed and figures accommodating student graduates are currently inflated and inaccurately calculated.
As a result, the loss of Green Belt space is not justified and sites currently proposed for development in the Green Belt could be removed.
As for the unmet housing need of Woking, it would seem if it were a genuine need, it could only possibly be met in Woking itself. If additional housing were built elsewhere the need for housing in Woking would still exist.
Please re-open the examination.
Yours Faithfully,
Janet Ashton

Attached documents:

Comment: MM25 - LPMM18/1344  Respondent: Mrs Janet Ashton 20689281  Agent:

The deleted definition for policy paragraph 2 should remain and be strengthened in order to protect heritage assets and their historic settings, otherwise the door is left open for irreparable harm and abuse. The definition should clearly demonstrate how proud the borough council is of the precious assets in its care, and how it will protect them at all costs. That it does not already do this is a national disgrace!

Attached documents:

Comment: MM25 - LPMM18/1347  Respondent: Mrs Janet Ashton 20689281  Agent:

I am stunned to discover this evidence of Guildford Borough Council’s complete neglect and disregard for the incredible heritage assets and historic settings it has in its care. It is a national disgrace!

Attached documents:

Comment: MM25 - LPMM18/1928  Respondent: Mrs Janet Ashton 20689281  Agent:

Dear Sir,


Guildford is privileged to have thirty Grade I Listed Buildings inside the Borough.

Twelve of these Grade I Listed Buildings are churches with their remarkable, unique surroundings, which provide an important source of peace, tranquility and sanctuary from the world in which we live. These sites are accessible to all and provide a perfect haven for wildlife. Ancient canon law means the churchyards themselves are enclosed and so create small scale areas of wildlife protection, a compelling and significant source for the conservation of our country’s biodiversity.

Also, as is the case with the Grade I Listed Church in the village in which I live, it is sited at the top of a hill where the views over to Guildford are simply stunning!

Other heritage assets within the borough include a castle, chapels and historic country houses.
The modified policy, paragraph 2, does nothing to ensure the protection of these precious sites. In fact it opens the door to destruction of these irreplaceable settings and does not portray the level of pride and responsibility one would expect with such charges in one’s care.

With the over stretched resources of Historic England, it is no longer realistic to expect another body to step in to help preserve our country’s historic buildings and settings. It has become more crucial than ever to ensure these environments and assets continue to be valued and protected for generations to come and it is vital this is reflected in our local plan.

Please do not allow these proposed modifications for the Historic Environment.

Yours Faithfully

Janet Ashton

**Attached documents:**

**Comment:** MM3 - LPMM18/1338  **Respondent:** Mrs Janet Ashton 20689281  **Agent:**

Please include the well researched and considered plan of Guildford Vision Group for the town centre.

**Attached documents:**

**Comment:** MM5 - LPMM18/1339  **Respondent:** Mrs Janet Ashton 20689281  **Agent:**

It would make sense to have a transit site in the borough for visiting friends and family of those at permanent pitches.

**Attached documents:**

**Comment:** MM9 - LPMM18/1340  **Respondent:** Mrs Janet Ashton 20689281  **Agent:**

It is unacceptable to lose any more Green Belt with current levels of wildlife extinction and illegal air pollution. Also, Worplesdon, not previously included in the local plan, is in the Green Belt, is an historic village with extensive Conservation Area and Special Protection Area with protected species in danger of extinction, and a site of Special Scientific Interest. There has been no democratic consultation surrounding it’s sudden, disingenuous, inclusion in the modified local plan. Please, therefore, exclude it.

**Attached documents:**

**Comment:** MM9 - LPMM18/1341  **Respondent:** Mrs Janet Ashton 20689281  **Agent:**
Worplesdon is an example of a village with a clearly defined settlement boundary. It would be disingenuous to remove clarity and meaning from such boundaries, leaving the door open for abuse, manipulation and uncertainty. Please uphold boundaries at all costs.

Attached documents:

Comment: MM9 - LPMM18/1922  Respondent: Mrs Janet Ashton 20689281  Agent:

Re: Guildford’s Modified Local Plan - MM9, Policy P2, Infilling - Worplesdon

Please be aware that for some reason the village of Worplesdon has been added, in black ink, to the list of villages under the heading c) “limited infilling.” This village was not proposed in the original draft plan, has not been inset from the Green Belt and there has been no public consultation as to its sudden inclusion. This is the first ‘proposal’ of its kind to suggest the idea of infilling inside or outside the village of Worplesdon.

As it is not highlighted in red ink, it is positioned so as to appear not to be a modification at all. However, it was never part of the draft local plan in the first place and it’s late inclusion in this manner is highly irregular and inappropriate.

c) "limited infilling" shall mean:

i. Limited infilling within the identified settlement boundaries, as designated on the Policies Map, of the following villages. Limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.

Albury, Compton, East Clandon, East Horsley (south), Gomshall, Holmbury St Mary, Peaslake, Pirbright, Puttenham, Ripley, Shere, West Clandon and Worplesdon.

As to the modified text highlighted in red, please do not allow the modification for infilling outside settlement boundaries. This could open the door for misplaced justification to overlook not only the Green Belt, but also Conservation Areas, Historic Settings, SPAs and SSSIs and allow ‘garden grabbing,’ and inappropriate changes to the patterns of housing.

By way of information, Worplesdon is an historic village mentioned in the Doomsday Book. Its Grade I listed Church, St Mary’s sits at the top of a hill with surrounding heritage environment and stunning views of Guildford. The Conservation Area includes other listed buildings and Special Protection Area and Site of Special Scientific Interest, Whitmoor Common, part of The Thames Basin Heaths.

Please would you reject this modification and see that Worplesdon is removed from the list so that a fair, democratic process may take place.

Attached documents:

Comment: MM9 - LPMM18/1924  Respondent: Mrs Janet Ashton 20689281  Agent:
While there is overwhelming focus on development and economic growth, our hearts and souls lie in the natural world. The importance of the Green Belt, with its ability to heal our minds and bodies, should not be underestimated.

A recent article in The New York Times notes that doctors are now prescribing time in nature.

With its capacity to nourish the senses and soothe the mind, nature stimulates and uplifts: the sound of the wind through leaves of a tree, the haunting cry of an animal; the sight of birds flying in formation or a butterfly landing on your coat... Nature gets you out of your head and into your heart.

While more facts are being collected, human instinct, common sense, and the urgent need to reconnect to nature is all too apparent. However much of this world relates to what we can not measure, what can not be seen or quantified. The natural world is a place where we experience quiet, where we don’t have to figure things out, we can just be and enjoy what it is to be alive. It’s a different world, a soft, comforting space that helps lead us to thoughts of kindness, compassion, spirituality, God and love. It gives us faith. It is what connects us to ourselves, what connects us to the planet, and what connects us to each other.

With so many species under threat of extinction, precious ecosystems once full of plant and animal life are in threat of complete collapse. The speed at which this is happening is all too startling. This is not a legacy to leave behind and it is our responsibility to care for and preserve our natural resources - but most of all, to remember what it is to be a human being.

Please help preserve the Green Belt. Please help Guildford do something remarkable and set a good example, like Costa Rica perhaps, and make us proud to be part of the borough by protecting our natural heritage.

Attached documents:
Re: Guildford's Modified Local Plan - MM9, Policy P2, Infilling - Worplesdon

Please be aware that for some reason the village of Worplesdon has been added, in black ink, to the list of villages under the heading c) “limited infilling.” This village was not proposed in the original draft plan, has not been inset from the Green Belt and there has been no public consultation as to its sudden inclusion. This is the first ‘proposal’ of its kind to suggest the idea of infilling inside or outside the village of Worplesdon.

As it is not highlighted in red ink, it is positioned so as to appear not to be a modification at all. However, it was never part of the draft local plan in the first place and it’s late inclusion in this manner is highly irregular and inappropriate.

c) "limited infilling" shall mean:

i. Limited infilling within the identified settlement boundaries, as designated on the Policies Map, of the following villages. Limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village. Albury, Compton, East Clandon, East Horsley (south), Gomshall, Holmbury St Mary, Peaslake, Pirbright, Puttenham, Ripley, Shere, West Clandon and Worplesdon.

As to the modified text highlighted in red, please do not allow the modification for infilling outside settlement boundaries. This could open the door for misplaced justification to overlook not only the Green Belt, but also Conservation Areas, Historic Settings, SPAs and SSSIs and allow ‘garden grabbing,’ and inappropriate changes to the patterns of housing.

By way of information, Worplesdon is an historic village mentioned in the Doomsday Book. Its Grade I listed Church, St Mary’s sits at the top of a hill with surrounding heritage environment and stunning views of Guildford. The Conservation Area includes other listed buildings and Special Protection Area and Site of Special Scientific Interest, Whitmoor Common, part of The Thames Basin Heaths.

Please would you reject this modification and see that Worplesdon is removed from the list so that a fair, democratic process may take place.

Attached documents:

Comment: MM9 - LPMM18/4861  Respondent: Mrs Janet Ashton 20689281   Agent:

Re: Guildford's Modified Local Plan - MM9, Policy P2, Green Belt.

While there is overwhelming focus on development and economic growth, our hearts and souls lie in the natural world. The importance of the Green Belt, with its ability to heal our minds and bodies, should not be underestimated.

A recent article in The New York Times notes that doctors are now prescribing time in nature. With its capacity to nourish the senses and soothe the mind, nature stimulates and uplifts: the sound of the wind through leaves of a tree, the haunting cry of an animal; the sight of birds flying in formation or a butterfly landing on your coat... Nature gets you out of your head and into your heart.

While more facts are being collected, human instinct, common sense, and the urgent need to reconnect to nature is all too apparent. However much of this world relates to what we can not measure, what can not be seen or quantified.

The natural world is a place where we experience quiet, where we don’t have to figure things out, we can just be and enjoy what it is to be alive. It’s a different world, a soft, comforting space that helps lead us to thoughts of kindness, compassion, spirituality, God and love. It gives us faith. It is what connects us to ourselves, what connects us to the planet, and what connects us to each other.
With so many species under threat of extinction, precious ecosystems once full of plant and animal life are in threat of complete collapse. The speed at which this is happening is all too startling. This is not a legacy to leave behind and it is our responsibility to care for and preserve our natural resources - but most of all, to remember what it is to be a human being.

Please help preserve the Green Belt. Please help Guildford do something remarkable and set a good example, like Costa Rica perhaps, and make us proud to be part of the borough by protecting our natural heritage.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/1351</th>
<th>Respondent: Alicia Pigram 20689441</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I OBJECT to MM41, the building of 550 homes at Garlicks Arch. Having previously objected to the lower number of 400 homes, which have been ignored. Increasing the number of homes to 550 will increase traffic in the local community, blocking up adjacent roads with at least an extra 800 cars. Local schools and medical facilities will be put under extreme pressure with the large increase in population that come with 550 new homes. Garlicks Arch is also a green belt site with ancient woodland that we would never be able to get back.</td>
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<th>Respondent: Alicia Pigram 20689441</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I OBJECT to MM42, the proposal for 14,800 sq m of industrial and storage space to land at Burnt Common, London Road. This has now doubled in size after the original 7000 sq m proposal was deleted from the 2014 plan. With Slyfield having unused capacity, there is no need to loose green belt land to new industrial sites. This also contradicts the MM9 Green Belt Policy as there are no special circumstances. The increase in traffic on surrounding roads will cause gridlocks and increases in nitrogen dioxide levels, having a detrimental effect on the health of the local community.</td>
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<th>Agent:</th>
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<tbody>
<tr>
<td>I OBJECT to MM44, a new site for 120 homes at Aldertons Farm, Send Marsh Road. Another loss of the Green Belt, contradicting MM9 as there are no special circumstances. Increased traffic adding pressure to the Send Crossroads. The infrastructure of the village will not cope with the increased traffic that comes with the 770 new homes planned (120 at Aldertons Farm, 550 at Garlicks Arch, 60 at Clockbarn and 40 at Winds Bridge), this is a 45% increase to the 1700 homes currently in Send.</td>
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<tr>
<th>Comment: MM2 - LPMM18/1370</th>
<th>Respondent: Mrs Alison Warne 20689665</th>
<th>Agent:</th>
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</table>
If Woking's needs are unmet, it is up to them to find the required additional housing. It is unfair to expect Guildford to absorb the shortfall. Is this because Guildford house prices are higher than Woking, so developers will make more profit from building in Guildford?

Attached documents:

Comment: MM41 - LPMM18/1374  Respondent: Mrs Alison Warne 20689665  Agent:

From a transport perspective, Send will never be able to cope with the increased traffic of 400 homes, let alone 550. There are limited crossing points of the River Wey and Wey navigation, which means that Send is a bottleneck, especially as it is used as a cut-through of traffic from the A3 to Woking. When there is any problem on the A3, the Portsmouth Road and Send Road get gridlocked. Additional housing of this scale will make the situation intolerable. I note that the plan is to build 450 of these homes in the first 5 years, so it will not be possible to make any traffic infrastructure changes in that time.

It is undemocratic that 700 objections to previous consultations have been ignored. The new proposals are even worse! The 37% increase is completely unreasonable, and constitutes over development.

We have suffered from flooding in the period that I have lived in Send Marsh, and the development will hinder the ability of existing drainage to absorb rainfall if the land at Garlicks Arch is developed.

Attached documents:

Comment: MM42 - LPMM18/1375  Respondent: Mrs Alison Warne 20689665  Agent:

Despite all the previous objections to the last version of the plan, the Council have now proposed doubling the size of this development, and say there is scope for a larger amount of floorspace if needed.

Slyfield has spare capacity which should be used instead of this development.

Such extensive development will have a negative visual impact on the area.

The area of Send and Ripley cannot cope with the additional commercial/HGV traffic that will be brought to the area. It already becomes gridlocked whenever there is the slightest problem on the A3.

There are no special circumstances which merit the contravention of the Green Belt Policy MM9.

Attached documents:

Comment: MM44 - LPMM18/1378  Respondent: Mrs Alison Warne 20689665  Agent:

This has previously been deleted from the plan due to all the objections. Are these objections now to be ignored?

From a transport perspective, Send is a bottleneck, because there are limited crossing points of the River Wey and Wey navigation. To make matters worse, Send and Send March are used as a cut-through of traffic from the A3 to Woking.
Additional housing at Alderton's farm will increase the traffic at Send crossroads, which is also close to Send Primary School.

Send Marsh Road has a small narrow bridge, which restricts traffic flow. Any increased traffic on Send Marsh Road is likely to increase the risk of accidents at the bridge.

**Attached documents:**

**Comment: MM9 - LPMM18/1379  Respondent: Mrs Alison Warne 20689665  Agent:**

MM9 says that limited infilling may be acceptable within settlement boundaries. The proposals in this plan are not restricting themselves to this. Taking the example of Send and Ripley, it appears that the proposals within this plan, especially MM41, MM42 and MM44, will result in eventually joining the two villages, to the detriment of local residents. It will change the nature and culture of the two villages, which are currently semi-rural.

**Attached documents:**

**Comment: MM41 - LPMM18/1383  Respondent: Mrs Christine Mote 20689729  Agent:**

Yet again the people of Send and Ripley are being ignored. Who wants to live next to the A3 in a field subject to flooding and excessive noise. What infrastructure will be put in place to cope with the extra traffic and increased number of residents requiring local facilities such as doctors surgeries and schools. Why target green belt when there are more suitable brown belt sites available. Send will no longer be a village, merely an extension of Guildford where any proposed development has been kept to a minimum.

**Attached documents:**

**Comment: MM42 - LPMM18/1384  Respondent: Mrs Christine Mote 20689729  Agent:**

Why choose this site when there is currently unused capacity at Slyfield. The current road layout is inadequate for such an increase and from an economic perspective is this proposed site even viable. It's on the edge of a small village surrounded by green belt and clearly contradicts MM9 as there are no special circumstances to indicate the need for such a large commercial site.

**Attached documents:**

**Comment: MM44 - LPMM18/1386  Respondent: Mrs Christine Mote 20689729  Agent:**

The land around Alderton's Farm is inhabited by deer and other wildlife. It is in the greenbelt and will detract from the buildings in the surrounding area. Again the infrastructure is not in place to cope with the increased traffic. Send Marsh
Road is quite narrow and is at capacity as is at peak times. With other proposed housing developments in the area there is no need for such a large development in such an inappropriate place.

**Attached documents:**

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**Comment: MM48 - LPMM18/1389  Respondent: Mrs Christine Mote 20689729  Agent:**

As with the previous local plan GBC has failed to address the increased traffic implications for the local area. It's all very well proposing two new A3 sliproads but the traffic still has to go somewhere. There has been no proper assessment by GBC of the impact on additional traffic, noise, pollution, delays and likely gridlock. What have they actually been assessing on in the last few years? This uncertainty has gone on too long and yet again GBC has failed to engage in an open and transparent manner with local residents.

**Attached documents:**

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**Comment: MM9 - LPMM18/1388  Respondent: Mrs Christine Mote 20689729  Agent:**

The Council and the Planning Inspector have ignored the wishes and voices of the residents of Send and Ripley. What exceptions can GBC come up with to justify the modifications to the green belt here and not in many other potential areas in the borough? How can such a huge increase in housing, industrial and road infrastructure be fair and viable?

**Attached documents:**

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**Comment: MM27 - LPMM18/3037  Respondent: Mr Martin Threakall 20689761  Agent:**

**MM27, MM41, MM42 and MM48 Transport Policy**

I object to these; I do not believe that the traffic implications for the various Send sites (Garlick's Arch, Burnt Common, Clockbarn and Alderton's) are adequately addressed by the A3 changes and local slip roads. There will be a very significant increase in traffic along Send Barns Lane and Send Road with thousands of additional cars likely to use these daily to go to and from Woking, a route that is already often blocked with traffic jams.

**Attached documents:**

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**Comment: MM41 - LPMM18/3034  Respondent: Mr Martin Threakall 20689761  Agent:**

**MM41 Land at Garlick's Arch, Send Marsh, Policy A43**

I object to this amendment I feel that the increase of 150 homes (37%) on top of the previously allocated 400 on this site is beyond excessive. The site already drew a significant number of objections to a smaller development, and this fact seems to have been ignored in increasing the allocation.
The development will effectively connect Ripley and Send, overdeveloping the area. I am extremely concerned about the level of additional traffic that will result on the local roads. Other infrastructure such as schools and medical facilities will also be unable to cope with this additional load.

Finally, it is quite appalling that the development is on Green Belt land and will destroy ancient woodland.

**MM27, MM41, MM42 and MM48 Transport Policy**

I object to these; I do not believe that the traffic implications for the various Send sites (Garlick's Arch, Burnt Common, Clockbarn and Alderton's) are adequately addressed by the A3 changes and local slip roads. There will be a very significant increase in traffic along Send Barns Lane and Send Road with thousands of additional cars likely to use these daily to go to and from Woking, a route that is already often blocked with traffic jams.

**Attached documents:**

**Comment:** MM42 - LPMM18/3035  **Respondent:** Mr Martin Threakall 20689761  **Agent:**

**MM42 Land at Burnt Common, Send, Policy A58**

I object to this increase from 7000 to a minimum of 14,800 sq m of industrial and storage space.

This is by far the largest new industrial allocation in the borough, and is being built on to Green Belt land. Again this is appalling given there is unused capacity at other sites like Slyfield. I can see no special circumstances for this, suggesting it is against MM9. From a commercial stand point it is confusing at best; this modification is on top of the 25% increase at Send Business Centre, meaning there is a significant concentration of increased industrial space in the village of Send, and yet it is unclear where the demand for this will come. I see "To Let" signs daily outside of the commercial/industrial space in Send and it seems this increase in capacity will just add to the problem.

**MM27, MM41, MM42 and MM48 Transport Policy**

I object to these; I do not believe that the traffic implications for the various Send sites (Garlick's Arch, Burnt Common, Clockbarn and Alderton's) are adequately addressed by the A3 changes and local slip roads. There will be a very significant increase in traffic along Send Barns Lane and Send Road with thousands of additional cars likely to use these daily to go to and from Woking, a route that is already often blocked with traffic jams.

**Attached documents:**

**Comment:** MM44 - LPMM18/3036  **Respondent:** Mr Martin Threakall 20689761  **Agent:**

**MM44 Land at Alderton's Farm, Send March Road, Policy A63**

This modification is the site I object to most strongly. As you'll know, it was deleted from previous draft plans based on the significant objections. It is Green Belt land with no special circumstances so it contradicts policy MM9. The significant new development will detract from the beautiful heritage buildings at Send Marsh Green. The additional traffic will cause increased pressure on local roads including Send Crossroads. It seems unbelievable to me that it has been thought appropriate to increase the number of houses further in Send; this along with Garlick's Arch, Clockbarn and Winds Ridge adds 770 houses to the circa 1700 currently in Send; an increase of 45%!! This is far too much for the local infrastructure including roads, medical services and schools.
Comment: MM48 - LPMM18/3038  Respondent: Mr Martin Threakall 20689761  Agent:

**MM27, MM41, MM42 and MM48 Transport Policy**

I object to these; I do not believe that the traffic implications for the various Send sites (Garlick's Arch, Burnt Common, Clockbarn and Alderton's) are adequately addressed by the A3 changes and local slip roads. There will be a very significant increase in traffic along Send Barns Lane and Send Road with thousands of additional cars likely to use these daily to go to and from Woking, a route that is already often blocked with traffic jams.

Attached documents:

Comment: MM9 - LPMM18/3033  Respondent: Mr Martin Threakall 20689761  Agent:

**MM9 Green Belt Policy**

I object to the modification to allow an exception for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village." My concern is that this "opens the door" for developers and speculators to buy up and develop land on the edge of Send (and other villages) and no longer provides a clear objective position on whether planning permission will be granted. There is now a level of subjectivity involved in the decision making as to whether a site "should be considered to be within the village", introducing uncertainty and significantly negating Green Belt protection.

Attached documents:

Comment: MM45 - LPMM18/1404  Respondent: Mr John Archer 20689857  Agent:

I would like to register an objection for the 103 dwellings under MM45. I accept the need for affordable housing, but given the rural nature of Normandy, and this last minute inclusion of this in the plan (making consultation all but very difficult), these high density homes are not in character with the area. I also have a number of other issues relating to this proposal.

There is no explanation of the ‘exceptional circumstances’ as to why the green belt boundary should be redrawn. This is a significant abuse of grenbelt land. Given the proximity of the Surrey Hills Area of Outstanding Natural Beauty, this plan is again out of keeping with the area. Previous plan for this land have of course been turned down before for the same reason.

Traffic on Glaziers Lane (operative name LANE) is already very busy on this narrow lane. Given poor public transport (other than Wanborough Staation) car movements will be required for all but commuting to/via Guildford. The narrow pavement, while recently resurfaced, is not safe for pushchairs or mobility impaired access, particularly as vehicles (often heavy vehicles) regularly break the speed limit.

Wanborough station only has mobility access from the Reading/Ascot bound platform, not the Guildford direction.
There are no community facilities in the area, and none are planned. The doctors surgery is already beyond full capacity, typically requiring more than 1 week to get a doctors appointment. This proposed development will not secure additional facilities and will just over burden the existing infrastructure.

GBC has failed to make proper use of brownfield sites, and developers are more keen to build on green belt land purely to increase their profits.

Thank you for your consideration.

Attached documents:

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**Comment:** MM2 - LPMM18/1403  **Respondent:** Mr Michael Voisin 20689889  **Agent:**

On behalf of the 251 residents of Godalming and Eashing listed in the attached document, collectively using the name Godalming Community, we are setting out our response to the consultations on the Main Modifications to the Guildford Local Plan. This mainly relates to MM2 and MM39.

I also attach the Representation by Way of Objection (RBWO) and Second Representation by Way of Objection (SRBWO), in each case submitted to Waverley Borough Council mentioned in the main attachment.

Michael Voisin
Westbrook
Westbrook Road
Godalming
GU7 2QH

Attached documents:  Guildford Consultation Response Final as Filed.pdf (15.6 MB)
Second Representation by Way of Objection - Final Published.pdf (14.1 MB)
Final Letter of Objection 31.8.18 with appendix.pdf (5.3 MB)

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**Comment:** MM2 - LPMM18/1415  **Respondent:** Derek Carley 20690369  **Agent:**

It is with huge disappointment to me that it is necessary to respond to the Modified Local Plan. Having been awarded the Guildford Design award last year and met a number of key people in the council and Planning department I would have anticipated a more positive development of the Local Plan. Sadly this is not the case, and to me personally this somewhat devalues the merit of the awards.

It also seems you have largely failed to engage, collaborate and take account the highly constructive and valuable work undertaken by the Guildford Vision Group (GVG) and the Guildford Society.

My comments fall into two categories firstly in respect of the Local Plan in general, and secondly but no less importantly about specific details of the Main Modifications of the Plan.

The Local Plan is unsound because:
1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and they are beyond the council’s control
3. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit
4. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination
5. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Comment: MM23 - LPMM18/1417  Respondent: Derek Carley 20690369  Agent:

1. MM3 - POLICY D1: GBC as a major landowner in the centre of the town, must accept the same obligations as imposed on other strategic site owners by the council as planning authority.

The Council have shown to me that hidden in its midst it has an awareness and understanding of what good and excellent looks like through he Guildford Design awards. Now it is desperately urgent that it transposes this into a meaningful Local Plan. A Plan that all Residents Businesses and local services in Guildford can aspire and look forward to. A plan that hopefully can save the future of this once beautiful place set amidst a designated Area of Outstanding Natural Beauty.

Comment: MM3 - LPMM18/1416  Respondent: Derek Carley 20690369  Agent:

In respect specifically of the Main Modifications MM3 1 would note

1. MM3 - POLICY S3: GBC must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
2. MM3 - POLICY S3: Guildford must have an effective local Plan. Development Rules must ensure quality of development across the town centre. Without such there is little point in continuing with the Guildford Design Awards which sets a bench mark for excellence in Design in the Built environment!!
3. MM3 – POLICY S3: GBC should adopt GVG proposals, including the new crossing or equivalent effective alternative to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Comment: MM2 - LPMM18/1420  Respondent: Joy Walley 20690497  Agent:

The Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and they are beyond the council’s control

3. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

4. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination

5. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

**Attached documents:**

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**Comment:** MM3 - LPMM18/3074  **Respondent:** Jo Owens 20690625  **Agent:**

I strongly believe that the two traffic bridges crossing the river are very dangerous. The walking route from the station to the Friary is narrow and always busy with pedestrians. And the traffic speeds past them leaving a safety space of only inches. This surely has to be addressed urgently as it’s only a matter of time before there will be a serious accident. Also – with all of the pollutants that the pedestrians are inhaling, it makes it a very dangerous walk indeed.

I support GVG’s suggested plan of building a new bridge and separating the traffic from the pedestrians.

**Attached documents:**

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**Comment:** MM13 - LPMM18/1435  **Respondent:** Mr Nick Mellstrom 20690721  **Agent:**

I would like to OBJECT strongly to the following amendments:-

MM13 I OBJECT to the lack of consideration of existing sites within Guildford which are due to the loss of retail businesses particularly in view of the present trend to shop on line. Many more affordable houses could be built in the town centre and on brownfield sites.

**Attached documents:**

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**Comment:** MM2 - LPMM18/1431  **Respondent:** Mr Nick Mellstrom 20690721  **Agent:**

I would like to OBJECT strongly to the following amendments:-

MM2 The suggestion that Guildford takes Woking ‘s unmet housing needs when we have difficulty in meeting our own needs.

I OBJECT strongly to the proposal to build another 500 houses in Send with the increase in numbers of cars which such a density of housing would cause.

**Attached documents:**
Comment: MM40 - LPMM18/1434  Respondent: Mr Nick Mellstrom 20690721  Agent:

I would like to OBJECT strongly to the following amendments:-

MM9 I OBJECT most strongly to the site of Three Farms Meadows still not being exempt from design constraints. The addition of land to the south of the site does not in any way help the density issue as much of it is already prevented by VOR from construction within a certain radius of the air traffic control beacon. This is also land next to the Ockham conservation area and an AONB

Attached documents:

Comment: MM50 - LPMM18/1436  Respondent: Mr Nick Mellstrom 20690721  Agent:

I would like to OBJECT strongly to the following amendments:-

MM47 despite the whole site qualifying on ecological grounds the size of the SNCI is drastically reduced. I OBJECT to this as it has no justification. The biodiversity will be destroyed by any development and I do not consider that an appropriate assessment and Habitats Regulation assessment has been completed In conclusion I ask that the hearing be reopened so that ONS figures can be reconsidered and these matters of great concern can be addressed

Attached documents:

Comment: MM39 - LPMM18/1438  Respondent: Witley Parish Council (Sarah Nash) 20690785  Agent:

Submission Local Plan: Strategy and Sites - Main Modifications
Policy A61 – Land at Aaron’s Hill, Godalming

On behalf of Witley Parish Council, I would like to raise concern regarding the site referred to A61 in the Guildford Local Plan (Aaron’s Hill).
In particular, Witley Parish Council is concerned about the overall impact of this site in conjunction with the neighbouring Waverley Borough Council planning application WA/2018/1239, as well as the numerous sites around Milford that are included in both Waverley Local Plan Parts 1 & 2. We feel there has not been enough research into the cumulative impact of all of these developments coming forward in a short period of time. The total number of dwellings arising from all three sites is in excess of 800 (200 for site A61, 263 for WA/2018/1239, and 450 for Milford in the Waverley Local Plan). As a neighbouring Parish we would have expected to have been directly consulted on these proposals given the potential material impact on matters such as the road network within our area.

We are particularly concerned about the traffic impact from the Aarons Hill developments. Direct access from the proposed dwellings to the A3 will either go through the village of Eashing, which has a restricted bridge, or along Eashing Lane into the parish of Witley, and join the A283 on the Guildford and Godalming by-pass road. These roads/junctions are not suitable for large volumes of traffic, or heavy goods vehicles, and despite restrictions being placed on previous developments in this area, the lack of enforcement rendered these restrictions meaningless. There appears to be no provision in the proposed development for local amenities such as shops, which will increase traffic movements, as people shop and work elsewhere.

The Guildford Local Plan contains no references to infrastructure improvements either on the strategic road network or local infrastructure network relating to this development. As the incident which occurred on Thursday October 4th
showed, only one vehicle needs to break down on the A3 in Guildford and block one lane, to paralyse the A3 back to Milford and subsequently gridlock Godalming, the A3100 and A281 into Guildford. This is far from an isolated occurrence.

Both Aaron’s Hill sites are sites which need to be released from the Green Belt, however when the Witley Neighbourhood Plan enquired about releasing the previously developed land at Secretts from the Green Belt, it was told that it wasn’t possible. The Secretts site would have been preferable to many in the locality.

We feel that the Guildford site, A61, merely transfers the problem of providing infrastructure onto Waverley Borough Council. Guildford Borough Council does not appear to be sharing any of the responsibility for ensuring this is a sustainable development, however will clearly benefit from the resulting S106/CIL monies received, with none likely to be granted to Waverley Borough Council and the neighbouring parishes. Given that the ONS have revised their housing need figures downwards (see https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/
populationprojections/bulletins/2016basedhouseholdprojectionsinengland/2016basedhouseholdprojectionsinengland) it brings into question the need for so many houses in Guildford’s Local Plan.

We also recognise the environment concerns relating to rare species highlighted by community groups in those areas, and feel that a thorough independent assessment needs to be undertaken before either of the Aaron’s Hill developments take place.

Should you wish to discuss these matters please do not hesitate to contact me.

Attached documents:

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**Comment:** MM2 - LPMM18/1437  **Respondent:** Tony Mason 20690817  **Agent:**

I object to the scale of new housing planned for Ripley and Send.

This will forever change the nature of our villages and increase road traffic.

Town centres and brownfield sites should always be used first - not green belt sites.

Policy S2

The housing needs figures have been grossly exaggerated and this is surely fuelled by the profits that building the houses would generate.

At the Public Examination the figure for Guildford Borough housing need being used by the Inspector was 789 per year. Since then a respected consultancy, Barton Willmore, has said that the correct figure should be 431. September data from the Office for National Statistics suggests that appropriate growth in Guildford Borough can be achieved with 460 houses a year. Both these totals are hugely less than the total assumed by the Inspector. This could make a massive difference to the proposed developments in Send.

I call for the examination in public to be resopened so that the latest Office of National Statistics can be used.

I support the representation made by WAG which was written with advice from Richard Harwood QC

Attached documents:

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**Comment:** MM2 - LPMM18/1445  **Respondent:** Anthony Teal 20690913  **Agent:**

2129 of 2554
I understand the Office for National Statistics (ONS) has published the latest household projections for local authorities which uses more recent data and a different methodology than its predecessors. The revised figures suggesting the borough’s housing need is far below the proposed housing target in the local plan. The expert employed by Guildford Residents’ Association Neil Mac Donald has shown that around 360 homes per annum would be sufficient to support the economic growth rate proposed by the Inspector and even GL Hearn’s values would reduce from 642 to 480 homes a year. As the figures in MM2 are no longer up to date and cannot provide a sound basis for the Plan, I would request that the Examination be re-opened to allow a meaningful and informed debate on this vital issue. Any sensible reduction can only benefit local amenities, roads and the overburdened infrastructure in Guildford and its local environs. It would also prevent the overzealous loss of the Green Belt, which needs to be preserved for the benefit of the whole community.

I would also wish to fully support the submissions put forward by the Burpham Community Association and the Burpham Neighbourhood Forum.

Attached documents:

Comment: MM39 - LPMM18/1450  Respondent: Geoffrey Brazier 20690945  Agent:

MM39. Main Modification to the original Plan and relates to the 200 at Aarons Hill Ref A61

I wish to submit objection to the removal Green belt land for development at Aarons Hill, this currently straddles a further Development proposal with Waverley Borough Council WA/2018/1239

I believe this land is an AGLV & Part of AONB, my understanding is that prime agricultural land is an irreplaceable asset that must be protected for future generations particularly in the rich farming areas of the South East. If farm land is going to be used for future housing developments then I don’t see how this country will be able to provide the essential food/dairy requirements for the future generations, we will have no choice but to import more from neighbouring EU countries. As the global human population continues to rise, more land will need to be committed to agricultural production to meet a rise in demand for food. This has the potential to intensify agricultural activities on land already used for food production

ONS report released very recently contradicts the Housing needs within local authorities, I thinks that these new findings need to be carefully considered before adopting this local plan for housing needs

Removing the land for development will do nothing to address affordable housing targets, the unmet housing from Woking, decimate the local wildlife habitat and will create additional traffic & infrastructure challenges for years to come that Godalming will have to deal with not Guildford.

This is a special area in Godalming and is enjoyed by thousands of Waverley residents and members of the public over centuries and to change the classification of this land so that a Developer can submit a proposal will decimate the area

If this is removed, this will open the flood gates to Greenbelt Land removal and give the green light to Developers to submit proposals, I don't see that local residents have a say anymore as to how the local area should be best suited to everyone needs.

What green land will be left if you start building in the countryside.

Attached documents:

Comment: MM27 - LPMM18/1454  Respondent: Lauren Stafford 20690977  Agent:
MM27, MM41, MM42 and MM48

- Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads. The increase in noise, pollution, delays and gridlock as cars drive through to Woking would be terrible. How can you let that happen past a PRIMARY SCHOOL?

Attached documents:

Comment: MM41 - LPMM18/1451  Respondent: Lauren Stafford 20690977  Agent:

MM41, Policy A43

- Excessive % increase in the number of proposed houses
- How can you ignore 700 previous objections?
- It’s green belt land
- Huge risk of flooding
- 800 extra cars is inconceivable and will cause so much more pollution in Send – right where my children will go school
- Ridiculous amount of pressure on local school and doctors. And Ripley school has also just been closed!

Attached documents:

Comment: MM41 - LPMM18/1455  Respondent: Lauren Stafford 20690977  Agent:

MM27, MM41, MM42 and MM48

- Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads. The increase in noise, pollution, delays and gridlock as cars drive through to Woking would be terrible. How can you let that happen past a PRIMARY SCHOOL?

Attached documents:

Comment: MM42 - LPMM18/1452  Respondent: Lauren Stafford 20690977  Agent:

MM42, Policy A58

- Increased amount of Industry and storage – again – traffic will be a nightmare on those tiny roads

Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads. The increase in noise, pollution, delays and gridlock as cars drive through to Woking would be terrible. How can you let that happen past a PRIMARY SCHOOL?

Attached documents:
**Comment: MM44 - LPMM18/1453  Respondent: Lauren Stafford 20690977  Agent:**

**MM44, Policy A63**

- It’s green belt land
- More houses in conjunction with other sites will again cause traffic pressure at Send traffic lights (already busy) and this is where primary school children walk to school

Attached documents:

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**Comment: MM48 - LPMM18/1456  Respondent: Lauren Stafford 20690977  Agent:**

**MM27, MM41, MM42 and MM48**

- Traffic implications are not adequately addressed by the A3 changes and the Clandon slip roads. The increase in noise, pollution, delays and gridlock as cars drive through to Woking would be terrible. How you can let that happen past a PRIMARY SCHOOL?

Attached documents:

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**Comment: MM2 - LPMM18/1478  Respondent: Commercial Estates Group 20691297  Agent: Nexus Planning (Adam Ross)**

**Introduction**

These representations to the Guildford Borough Local Plan Main Modifications (“the Main Modifications”) are submitted on behalf of CEG, the Earl of Onslow and the Trustees of the Clandon Estate. They supplement the examination Statement submitted in May 2018 and respond specifically to the Main Modifications produced by Guildford Borough Council (“the Council”) in the light of the Inspector’s conclusion that the Council must allocate additional sustainable housing sites to deliver homes in the first five years of the Local Plan (following adoption).

These representations are also submitted further to the submission made to the Council on 31st July 2018 (Appendix 1) relevant to the suitability and deliverability of a scheme for 300 homes on the site we refer to as Land adjacent to Merrow Park and Ride but which is referred to as ‘Clandon Golf’ in the Council’s Sustainability Appraisal Addendum 2018 (for ease of reference we refer to the site as ‘Clandon Golf’ for the purposes of these representations). The information submitted to the Council in July, at the Council’s request, included:

i. a basic capacity plan which demonstrates, in accordance with the Council’s assumptions, that the area of land in question could, at an average density of approximately 29 dpa, deliver 300 homes utilising defensible boundaries formed by existing belts of vegetation which create eastern and southern boundaries (which could be strengthened further if required);

ii. a ‘Transport and Highways Feasibility Note’ produced by Systra confirming that 300 homes could be delivered without any reliance on improvements to the A3; and

iii. a ‘Deliverability Statement’ that confirms that this site, which is in single ownership, benefits from an existing vehicular access and already has a developer and technical team on board, could deliver 300 homes by 2023/24 i.e. in the first 5 years of the Local Plan post-adoption.
Our objection to the Main Modifications, in summary, is that the suite of additional housing allocations proposed by the Council to increase housing delivery in the early years of the Local Plan is neither sustainable nor made in accordance with the Council’s own spatial hierarchy. Indeed, the Sustainability Appraisal Addendum 2018 (“the SA Addendum”) confirms that in addition to being a sequentially preferable site on the Council’s own terms (the Clandon Golf site is a Tier 8 option whereas the selected sites are, or should be, in the lowest and least sustainable category -Tier 10), the development options that include development at the Clandon Golf site score materially higher than the options that do not.

Having regard to the Council’s own evidence base and spatial strategy, the intention to allocate a suite of sites that excludes the Clandon Golf site is unjustified and, therefore, unsound. For the reasons explained in detail in these representations, the Council must re-consider its proposed housing allocations and, in accordance with the SA Addendum, allocate one of the three most sustainable development options – all options that include the Clandon Golf site.

**MM2 (paragraph 4.1.9a)**

Paragraph 4.1.9a as proposed to be amended states that ‘Guildford’s objectively assessed housing need has been based on a consideration of the latest 2018-based population projections.’

This is not correct.

The population projections that the Local Plan is now based upon are those published on 24th May 2018 but they are in fact 2016-based. The relevant statistical bulletin from the ONS is titled ‘Subnational population projections for England: 2016-based.’

**Change Required**

Amend paragraph 4.1.9a to identify that Guildford’s objectively assessed need for housing has been based on consideration of:

“…the ‘Subnational population projections for England: 2016-based.’”

**MM2 (Table S2b)**

**Introduction**

Table S2b sets out the spatial strategy distribution as amended following the proposed allocation of additional sites to deliver housing in the earlier years of the LP period (MM39, MM41, MM43, MM44 and MM45).

However, the revised table highlights the unsustainability of the Council’s proposed new allocations which exacerbate the extent of development proposed in the least sustainable locations within the Borough. This unsustainable distribution is unnecessary, unjustified and unsound given that the Council’s own evidence base identifies that there are more sustainable, deliverable, and sequentially preferable sites available such as that at Clandon Golf.

The representations to Table S2b focus on the spatial implications of the Council’s approach, its unsustainability and its lack of consistency with the Council’s own spatial hierarchy / approach – all of which make this modification unsound.

**Unsustainable Housing Distribution**

Table S2b confirms that 3,350 homes are proposed to be allocated as ‘Urban extensions to Guildford’. This equates to 31% of the total number being allocated (10,592 homes). This focus (as a minimum) on urban extensions to Guildford is wholly appropriate given that it is the county town of Surrey and, by some distance, the most sustainable location for development in the Borough (and indeed the sub-region). Urban extensions to Guildford are identified as Tier 8 in the Council’s Sustainability Appraisal Report Update 2017.

With the allocation of the additional sites as proposed by the Council in the Main Modifications, the level of housing now proposed in Tier 9 and 10 locations as identified in the Sustainability Appraisal Report Update July 2017 i.e. the least
sustainable locations in the Borough, has now increased to 3,450 homes. This equates to 32% of the proposed number of housing allocations in the Borough.

Accordingly, it can be seen that there are now more homes proposed in the least sustainable locations in the Borough as are proposed at the sequentially preferable (based on the Council’s own evidence base / spatial hierarchy) and significantly more sustainable location as urban extensions to Guildford.

As set out in further detail later in our representations, this approach is unjustified, unnecessary and unsound given that there are acknowledged reasonable alternatives as urban extensions at Guildford (such as Clandon Golf) which the Council’s own evidence base confirms are deliverable, sustainable and sequentially preferable to those sites now proposed to be allocated.

Sustainability Appraisal Addendum September 2018

To inform the Council’s Main Modifications it instructed AECOM to produce an addendum to the original Sustainability Appraisal. As set out in paragraph 1.2.2 of that document, the aim is to:

‘...present information on the proposed modifications, and alternatives, with a view to informing the current consultation and subsequent plan finalisation.’

From a housing perspective the SA Addendum confirms that its purpose is to:

“...identify packages of sites to deliver 550 homes in the first five years of the plan period”.

In so doing it acknowledges that:

“First and foremost the strategy reflects an understanding that there is a hierarchy of places / potential growth locations within the Borough, and that a sequential approach to allocating development sites must be followed. In other words, capacity should be fully utilised at the most suitable sites (e.g. town centre sites), before moving down to the next tier in the hierarchy, and so on until a residual amount of growth is left to be delivered at sites in the bottom tier, namely village Green Belt sites, which tend to be less suitable for development.” (emphasis added)

In terms of providing for the additional housing required in the early years of the Local Plan (post-adoption), Table 6.1 of the SA Addendum confirms that it has identified seven potential housing package options for assessment. They are each a combination of various site options, and each option scenario would deliver between 550 and 650 homes in total.

Ultimately the Council’s chosen option, in terms of the package of new sites to be allocated, is Option 3 as identified in the SA Addendum – “Aaron’s Hill and small sites”. For clarity, the additional sites to be allocated are as follows:

• Land at Hornhatch Farm, Chilworth (MM43) – 80 homes
• Land at Aaron’s Hill, Godalming (MM39) – 200 homes
• Land east of Glaziers Lane, Flexford (MM45) – 105 homes
• Land at Alderton’s Farm, Send (MM44) – 120 homes

Whilst not a new site, the Council also proposes to increase the residential component of the existing allocation at Garlick’s Arch, Send Marsh.

In terms of the outcome of this SA Addendum, it states overtly at paragraph 7.2.1 that:

“The appraisal does not identify Option 3 as performing notably well in terms of any of the topic headings, but equally it is not identified as performing notably poorly in terms of any topic. It performs jointly least well in terms of two topic headings - ‘land’ and ‘brownfield’, but no major concerns are highlighted.” (emphasis added)

Indeed, this can be seen with reference to Table 6.1 of the SA Addendum which confirms that the Council’s selected option (Option 3) does not score as the best option against any of the identified topics.

In stark contrast to this, it can be noted from Table 6.1 of the SA Addendum that options that include the Clandon Golf site (Options 1, 4 and 7) score much better than the selected option. This is not particularly surprising given its highly sustainable location as an urban extension to Guildford.
More specifically with regard to the Clandon Golf site, the following can be noted in terms of the conclusions reached in the SA Addendum (as set out in the assessment tables on pages 57 to 73 of that document):

i. **Biodiversity** – Table 6.1 confirms that Option 4, which includes the Clandon Golf site, scores best against this topic assessment area. Options 1 and 7, which also include Clandon Golf, are ranked 2nd. With specific regard to the Clandon Golf site, the SA Addendum notes that:

- “The outcome is that Clandon Golf does stand-out as the least constrained of the larger site options.”
- “In conclusion, Option 4 (Clandon Golf + Small sites) performs best, including on the basis that it would lead to least concerns in respect of the SPA.”

ii. **Climate change** – Options 1 and 2 are ranked joint first (Option 1 includes Clandon Golf) against this topic assessment area. Dispersal of development amongst smaller villages is not supported. With specific regard to the Clandon Golf site, the SA Addendum notes that it:

“...is approximately 3km from Guildford town centre, but Merrow Local Centre is approximately 1 km away. The site is adjacent to the Merrow Park & Ride from where there are frequent bus services into Guildford town centre as well as advisory cycle lanes along the majority of Epsom Road between the town centre and the Park and Ride site, with opportunities for improvement.”

iii. **Communities** - Option 1 including Clandon Golf scores best against this topic assessment area. There is no specific commentary associated with the Clandon Golf site.

iv. **Economy** – all options score equally against this topic assessment area with a conclusion that it “...is not possible to differentiate between the alternatives.”

v. **Employment** - all options score equally against this topic assessment area with a conclusion that “...the alternatives are judged to perform broadly on a par under this heading”.

vi. **Flooding** - all options score equally against this topic assessment area with a conclusion that “...it is not clear that any of the sites give rise to significant flood risk concerns”.

vii. **Health** - all options score equally against this topic assessment area with a conclusion that “...it is not possible to differentiate the alternatives”.

viii. **Historic Environment** - Option 7 (which includes Clandon Golf) is ranked first against this topic assessment area. With specific regard to the Clandon Golf site, the SA Addendum notes that whilst it is adjacent to Clandon Park (a Registered Park and Garden):

- “...the potential for significant impacts is seemingly low given the intervening A25 dual carriageway and mature screening vegetation”.
- Whilst there are a cluster of listed buildings 350m to the west of the site “...direct impacts are not thought likely”.

ix. **Housing** - Option 6 scores best against this topic assessment area. Options 3 and 7 (Option 7 includes Clandon Golf) are ranked second. The reason for this is identified as being that Option 6 would result “…in a good geographical spread of sites.”

We do not accept or understand the rationale for scoring Option 6 best in this regard, as the Council’s spatial strategy is not one of geographic dispersal but instead adopts a tiered, sequential approach which seeks to focus development in the most sustainable locations before moving to locations that are less sustainable. Accordingly, we do not accept that the scoring of the options against this topic is robust or consistent with the Council’s own spatial strategy.

x. **Land** - Option 7 (which includes Clandon Golf) scores best against this topic assessment area.

With specific regard to the Clandon Golf site, the SA Addendum notes that it is Grade 3b agricultural land (the lowest of all of the identified sites) but that unlike those other sites, Clandon Golf is (as its name would suggest): “…a golf course rather than land used for agricultural purposes.”

xi. **Landscape** - Option 2 scores best against this topic assessment area. Options 1, 3, 5, 6 and 7 (Clandon is part of Options 1 and 7) are ranked second. With specific regard to the Clandon Golf site, the SA Addendum notes that whilst
the site, on the Council’s evidence, is red-rated

Green Belt and in the AGLV (like the site at Aarons Hill which is a proposed allocation i.e. this is demonstrably not a show-stopper), the Landscape Character Assessment:
“...does not reference this golf course as a particular asset within the Merrow and Clandon Wooded Chalk Downs character area”.

xii. Poverty – all Options are scored equally against this assessment topic and the SA Addendum notes that “...there is no potential to differentiate the alternatives”.

xiii. Brownfield land - Options 4, 5, and 6 are equally ranked 1st against this topic assessment area (Option 4 includes Clandon Golf). There is no specific commentary with regard to the Clandon Golf site (or the majority of the other sites).

xiv. Rural Economy – all Options are scored equally against this assessment topic, with the SA Addendum concluding that “...it is not possible to differentiate the alternative with any certainty”.

xv. Safer Communities – all Options are scored equally in this regard, with the SA Addendum noting that “...it is not possible to draw conclusions in relation to safety / security.”

xvi. Transport – Options 1, 2 and 7 are ranked joint 1st against this topic assessment area (Clandon Golf is part of Options 1 and 7). With specific regard to the Clandon Golf site, the SA Addendum notes that:

“Vehicle trips to/from Clandon Golf to/from the south...will pass through part of the Guildford section of the A3 which is due to be improved by the RIS1 Road Period 2 scheme. Those travelling to/from the north towards London and the M25 motorway will not generally be expected to use this section of the A3.”

xvii. Water – all Options are scored equally against this assessment topic, with the SA Addendum concluding that “...there is no potential to differentiate the alternatives.”

It is evident from the SA Addendum that the Clandon Golf site, and the development options that include it, generally score the best of those assessed. Indeed it can be seen from the SA Addendum summary conclusions (Table 6.1) that Options 1, 4 and 7 (that all include the Clandon Golf site) are ranked first against 7 of the identified 17 topic areas (see highlighted table at Appendix 1). The Council’s selected option (Option 3) is not ranked first against any of the identified topic areas.

Whilst we accept that an SA process is not simply about adding up the results, it is evident that the options that score the best, when looked at in the round i.e. with the greatest number of / most significant positives, and the least number of / least significant negatives, are Options 1, 2 and 7. This is demonstrated visually on the bar chart at Appendix 2 where Options 1, 2 and 7 are the options with the most blue and orange colours (1st and 2nd rankings) and the fewest grey and yellow colours (3rd and 4th rankings).

In our view it is clear from the SA Addendum that of these Option 1 scores the best – “Clandon Golf and Aarons Hill”. This option has the greatest number of 1st rankings, the majority are 2nd rankings, it has very few 3rd rankings and no 4th rankings. The fact that Option 1 performs so well is not surprising, as the two sites included within it are those located in the most sustainable locations of those assessed as identified by the Council’s own spatial approach / hierarchy.

Against this evidential background, it is demonstrably unjustified and unsound for the Council to propose to proceed with an option which, as a matter of fact, allocates housing in the least sustainable locations in the Borough, and an option which identifies a suite of sites which score very poorly in the SA process.

The Council’s Justification for Option 3

As identified above, it is demonstrably the case that the SA Addendum does not support the selection of the Council’s chosen option (Option 3). Instead it very clearly supports an option that includes Clandon Golf (Options 1, 4 and 7). It is additionally the case that the Clandon Golf site, as a Tier 8 site identified in the SA Repot Update 2017, is sequentially
preferable to Aarons Hill and the smaller sites at the Green Belt villages (all Tier 10 and, therefore, the least sustainable locations in the Borough).

However, it is fair to note that the SA Addendum records (paragraph 5.2.9) that in some instances there can be a need to pass over allocating a site in one tier of the hierarchy in favour of allocating a more suitable site in a lower tier. Specifically, it records that relevant factors that could lead to such ‘leap-frogging’ include:

i. timescales for delivery;
ii. constraints (AONB, SPA, heritage etc…)
iii. reliance upon, or ability to facilitate provision of, essential infrastructure; and
iv. policy constraint e.g. Green Belt sensitivity.

For the reasons expanded upon below, it is evident that none of these provide reasons not to allocate the Clandon Golf site.

Timescales for Delivery

As shown at Appendix 3, we provided the Council with information in July 2018 relating to the potential for housing delivery at the Clandon Golf site. As a site in single ownership, with a developer and technical team already in place and with a vehicular access already constructed, development can progress quickly. Our submission demonstrates how the site could realistically deliver 300 homes by 2023/24. This delivery timetable in not disputed by the Council.

It is evident, therefore, that timescales for delivery provide no reason to ‘leap frog’ the sequentially preferable site at Clandon Golf in favour of less sustainable sites.

Environmental Constraints

The SA Addendum is clear that the Clandon Golf site is not constrained by the AONB, nor is it adversely affected by matters such as impact on the SPA (indeed it scores best of all the sites in this regard), flooding, heritage or biodiversity.

Accordingly it is evident that environmental constraints provide no reason to ‘leap frog’ the sequentially preferable site at Clandon Golf in favour of less sustainable sites.

Infrastructure

As set out in our submission to the Council (Appendix 3), 300 homes at the Clandon Golf site can be delivered without any reliance on improvements to the A3. Furthermore, given the limited scale of development being proposed on the various sites, none are providing any wider infrastructure.

Accordingly it is evident that infrastructure matters provide no reason to ‘leap frog’ the sequentially preferable site at Clandon Golf in favour of less sustainable sites.

Summary

There is no evidential basis to support the Council’s selection of Option 3 as the most appropriate strategy for the delivery of additional homes in the early years of the Plan (post-adoption).

As set out above, the SA Addendum clearly supports the allocation of Options 1, 2 or 7. The Clandon Golf site falls within Options 1 and 7. As set out previously, options including Clandon Golf demonstrably score the best based on the Council’s own evidence. In addition Clandon Golf, as an extension to Guildford, is sequentially preferable to all of the alternatives based on the Council’s own spatial hierarchy / approach.

Very unusually from our experience the SA Addendum, in outlining the reasons for selecting the preferred option (Option 3), distances itself totally from the decision ultimately made by the Council stating at paragraph 7.2.1 that:

“The following text was provided by the Council”

This is unsurprising as the conclusions of the SA Addendum fundamentally do not support the Council’s decision to take forward Option 3.
The SA process is there to inform decision-making, to ensure the delivery of sustainable development. It is also, importantly, there to provide clarity to third parties as to how decisions have been reached, and it is the fundamental evidence base document to demonstrate that a proposal is the most appropriate strategy i.e. justified and, therefore, sound.

In this instance the SA Addendum simply does not support the decision made by the Council in proposing to take forward Option 3.

In explaining why the Council is taking forward an option that is not supported by its own SA process, the Council states simply (SA Addendum paragraph 7.2.1) that it considers that the option it has chosen has ‘strong delivery certainty’. However, as set out previously, neither the SA Addendum nor the Council itself in any other document suggests that an alternative option, which includes Clandon Golf, would provide any less delivery certainty. Indeed, to suggest so would be perverse given that it is a site in single ownership, with a developer and technical team on board, with a vehicular access already constructed and in a location where there is clear and strong market demand.

Against this background, the Council’s Main Modifications, which take forward the suite of additional housing sites in Option 3, are not consistent with its own evidence base or spatial hierarchy / approach, and are demonstrably unjustified and, therefore, unsound.

**Re-categorisation of the Aaron’s Hill Site**

In the SA Report Update 2017 that accompanied the submission draft Local Plan, the site at Aarons Hill is identified as falling within Tier 10 (Green Belt around villages) – the least sustainable locations in the Borough.

It is referred to as ‘Site H’ and described at paragraph 6.6.16 of that document.

In the SA Addendum 2018 (Table 5.1) the Council has re-categorised the Aarons Hill site, identifying it within Tier 8 i.e. the same category as urban extensions to Guildford. The only justification for this change is set out at footnote 15 of the SA Addendum where the Council identifies that Godalming, whilst falling within Waverley Borough, is considerably larger than any of the Green Belt villages within Tier 10. This is potentially a case for the Aarons Hill site being considered to be more sustainable than the other Tier 10 sites, but not for suggesting that it is equivalent in sustainability terms as urban extensions to Guildford.

The implications of this amendment are significant. Following the Council’s identified sequential approach / hierarchy, development opportunities in Tier 8 should generally be developed before opportunities in Tiers 9 or 10, as they are inherently more sustainable.

The categorisation of Aarons Hill (as an urban extension to Godalming) as comparable in sustainability / sequential terms to the Clandon Golf site (as an urban extension to Guildford) is wholly unjustified.

As identified in the Waverley Local Plan Part 1, Godalming has a population of approximately 22,000 (at 2011). It records that the size and range of services in Godalming are less than Farnham and that it is significantly influenced by Guildford, which is approximately 10km (6 miles) away via good road and rail links.

By contrast, Guildford is the county town of Surrey. The Guildford Local Plan notes that Guildford town had a population of 137,000 in 2011 i.e. it is 6 times larger than Godalming. The Guildford Local Plan also recognises that it is home to two universities, a world leading research institute, a number of UK and European business headquarters and a world class research park. The borough also has a vibrant retail economy of subregional importance.

There is no reasonable or logical basis on which it can be asserted that an urban extension to Godalming is as sustainable as an urban extension to Guildford.

By identifying the Aarons Hill site as being within Tier 8 i.e. the same as Clandon Golf the Council is unfairly and unreasonably favouring the Aarons Hill site in what should be a fair and transparent SA process. As a consequence, the Council’s revised approach is unjustified and therefore unsound, resulting in an unnecessary and unsustainable distribution of development.

**Changes Required**
For the reasons set out in detail above, the revised spatial strategy established by MM2 (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents: [Main Modifications Reps Combined Redacted.pdf](file) (6.1 MB)

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**Comment:** MM2 - LPMM18/1504  **Respondent:** Commercial Estates Group 20691297  **Agent:** Nexus Planning (Adam Ross)

**Clandon Golf Course**

**Deliverability Statement**

1.0 Introduction

1.1 This short note supplements submissions made on behalf of CEG, the Earl of Onslow and the Trustees of the Onslow Estate to the Local Plan examination, where hearing sessions took place in June / July. Following these sessions the Inspector and Council agreed that the Council needed to make Main Modifications to the Plan that would, inter alia, allocate additional sites to deliver housing in the first 5 years of the Plan following adoption i.e. in the period 2019/20 to 2023/24.

1.2 Specifically, this note is provided to assist the Council in its consideration of the potential of the north western part of the Golf Course (referred to as ‘the Site’ for the purposes of this note), located adjacent to the existing Merrow Park and Ride and capable of accommodating approximately 300 homes, to deliver housing in the period to 2024.

2.0 Availability

2.1 The Site is in the single ownership of the Earl of Onslow / the Trustees of the Clandon Estate and is available for development.

2.2 The landowner has already engaged a developer (CEG) to bring land in this highly sustainable location forward for development. CEG has an excellent track record in delivering high quality residential developments on sustainably located greenfield sites at historic towns. By way of example these have recently included:

i. Stamford, Lincolnshire – 400 homes

ii. Chichester, West Sussex – 500 homes

iii. Thame, Oxfordshire – 400 homes

2.3 CEG has already appointed a full technical team who commenced work at the beginning of 2018.

3.0 Delivery

3.1 The development being considered (approximately 300 homes) is of a scale whereby it is realistic to assume that there would be two housebuilding outlets on site.
3.2 Against this background we summarise below a delivery timetable:

Q4 2018 - Adoption of the Local Plan
Q2 2019 - Submission of outline planning application
Q1 2020 – Outline planning permission granted
Q1 2020 – Submission of reserved matters
Q3 2020 – Approval of reserved matters
Q4 2020 - Discharge pre-commencement conditions
Q2 2021 - Start on site
2021/22 – 60 homes
2022/23 – 120 homes
2023/24 – 120 homes

Total Housing Delivery by 2023/24 – 300 homes

3.3 It can be noted that this is a similar (albeit more conservative) timetable to that put forward by the Council for the similarly sized site at Garlicks Arch promoted by a developer similar to CEG (see Appendix 4: Housing trajectory of the Council’s Topic Paper: Housing Delivery December 2017).

3.4 Of fundamental importance, the location of the Site and the scale of development proposed is such that the delivery of this housing is not reliant on the delivery of improvements to the A3.

3.5 As concluded in the attached technical note produced by Systra: “The number of trips associated with the sit, both onto the A3 and through its’ junctions is within normal expected daily variations in traffic flows on the route......Delivery of the site would be feasible early in the Plan period as the site will not be reliant on the delivery of any of the A3 improvement schemes.”

4.0 Suitability / Sustainability

4.1 Whilst not the primary purpose of this note the Council will be aware, having regard to its own evidence, that the Site is a suitable location for housing. Most notably, for ease of reference:

i. the Site it is situated immediately adjacent to the Guildford urban area, the principal settlement in the Borough;

ii. extensions to Guildford are identified in the Sustainability Appraisal 2017 as ‘Tier 8’ in the Council’s sequential approach to development. Development of the Site, applying this sequential approach, is therefore preferable to any new settlement options or development of any Green Belt site options around villages;

iii. unlike most other unallocated sites which were clearly rejected as options by the Sustainability Appraisal 2017, the SA 2017 identifies the Site as a location where the allocation of development should be considered (SA 2017 page 30);

iv. uniquely, the Site is located immediately adjacent to the existing Merrow Park and Ride, providing access to existing bus services to Guildford town centre which run every 15-20 minutes and take just 12-15 minutes;

v. the Site would complement and complete the Council’s proposed Sustainable Movement Corridor through Guildford (Figure 10.1 of the SA 2017), requiring only a simple southwards extension from the allocation at Gosden Hill that could terminate at the Merrow Park and Ride;

vi. the Site relates well to the existing Guildford urban edge and is located within easy walking and cycling distance of a range of existing education, leisure, retail, employment and community facilities;

vii. the Site is located in close proximity to the proposed new rail station at Guildford East (Merrow), delivery of which is due to commence in 2024;

viii. the Site already benefits from planning permission (01/P/01627) for the construction of (an as yet unbuilt) clubhouse and health centre of 14,500 sqft
i.e. there is already precedent for built development on the Site;
x. the Site is not countryside, with the land already significantly re-modelled / engineered and used as a golf course.

1. EXECUTIVE SUMMARY

1.1.1 This Transport & Highways Feasibility Note demonstrates that impact on the A3 of a potential 300 residential units located at the land adjacent to Merrow Park and Ride would be immaterial. The number of trips associated with the site; both onto the A3 and through its’ junctions, is within normal expected daily variations in traffic flows on the route, with a maximum of 58 additional vehicles anticipated (in the PM Peak hour). Delivery of the site would be feasible early in the Plan period as the site will not be reliant on the delivery of any of the A3 Improvement Scheme.

1.1.2 A large proportion of trips are expected to travel into Guildford Town Centre, and with the site located so close to the east of the town, there are ample opportunities to facilitate sustainable travel to and from the site, building upon the existing network which includes high quality walking and cycling links as well as an established Park & Ride providing regular direct and frequent services.

1.1.3 There are no transport reasons why the site should not be developed, at a reasonable timescale given the negligible impact on the A3 and the existing walking, cycling and public transport links which can be utilised to provide a sustainable development.

2. INTRODUCTION

2.1.1 This Transport & Highways Feasibility Note has been prepared by SYSTRA Limited on behalf of CEG, the Earl of Onslow and the Trustees of the Onslow Estate to demonstrate that development of approximately 300 residential dwellings could be successfully accommodated in transport terms on the part of the Clandon Golf Course site adjacent to Merrow Park and Ride, Guildford.

2.1.2 In particular this document demonstrates that the number of trips generated by a development of 300 residential units in this particular location would not have a material, let alone ‘severe’, impact on the existing operation of the A3, and therefore that the site could be delivered early in the Local Plan period without reliance on any forthcoming A3 Improvement Schemes.

2.1.3 The Note calculates the trips associated with a potential 300 dwelling development and calculates the number of vehicle trips that could be expected to use the A3.

Trip Generation

2.2.1 The potential vehicle trips generated by the site are provided in Table 1. The trip rates have been taken from the ‘Study of Performance of A3 Trunk Road Interchanges in Guildford Urban Area to 2024 Under Development Scenarios (April 2018)’ document; referred to hereafter as the ‘A3 Study of Performance’ which was prepared by Mott MacDonald and commissioned by Guildford Borough Council (GBC).

2.2.2 The highest recorded trip rates within the A3 Study of Performance; ‘Neighbourhood Centre, Mixed Private/affordable housing’ (Table 11: vehicle Trip Rates) have been used at this stage to provide a robust assessment of the potential impacts on the A3.

<table>
<thead>
<tr>
<th>Table 1: Trip Generation [300 Units]</th>
<th>AM Peak (0600-0900)</th>
<th>PM Peak (1700-1800)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Arrivals</td>
<td>Departures</td>
</tr>
<tr>
<td>Neighbourhood Centre</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.117</td>
<td>0.319</td>
</tr>
<tr>
<td>Trip Generation (300 Dwellings)</td>
<td>35</td>
<td>99</td>
</tr>
</tbody>
</table>

2.3 Trip Distribution
2.3.1 Analysis of Census 2011 Journey to Work (JTW) data for the ‘Guildford 011’ MSOA has been undertaken, with the percentage distribution also compared to the A3 Study of Performance to ensure a consistent approach. The use of JTW figures are useful as this represents one of the main trip purposes during the AM and PM peak periods. A summary of the distribution of traffic is demonstrated in Appendix A with distribution diagrams contained in Appendix B.

2.3.2 The data indicates that the vast majority of JTW trips (92.9%) would travel west from the site, with 7.1% turning east. A summary of the key destinations and resultant trip generation is demonstrated in Table 2.

<table>
<thead>
<tr>
<th>Route Destination</th>
<th>Percentage</th>
<th>Trip Generation (AM Peak)</th>
<th>Trip Generation (PM Peak)</th>
</tr>
</thead>
<tbody>
<tr>
<td>London, Berkshire, The North, East Anglia (M25)</td>
<td>24.4%</td>
<td>33</td>
<td>19</td>
</tr>
<tr>
<td>Centre of Guildford</td>
<td>21.4%</td>
<td>29</td>
<td>34</td>
</tr>
<tr>
<td>South &amp; South West London</td>
<td>7.4%</td>
<td>10</td>
<td>12</td>
</tr>
<tr>
<td>Merrow (Inc. Site)</td>
<td>5.4%</td>
<td>7</td>
<td>9</td>
</tr>
<tr>
<td>North west of Guildford, Woking</td>
<td>9.5%</td>
<td>13</td>
<td>15</td>
</tr>
<tr>
<td>University of Surrey Research Park &amp; Sports Park</td>
<td>4.7%</td>
<td>6</td>
<td>7</td>
</tr>
<tr>
<td>Farnborough, Farnham, Aldershot, West of Guildford</td>
<td>4.6%</td>
<td>6</td>
<td>7</td>
</tr>
<tr>
<td>Crawley, Dorking, Horsham, Cranleigh, Sussex</td>
<td>4.5%</td>
<td>6</td>
<td>7</td>
</tr>
<tr>
<td>Godalming, South of Guildford</td>
<td>7.5%</td>
<td>10</td>
<td>12</td>
</tr>
<tr>
<td>Leatherhead, West Horsley, Effingham, Great Bookham</td>
<td>3.9%</td>
<td>5</td>
<td>6</td>
</tr>
<tr>
<td>Burpham</td>
<td>2.6%</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>South/ East Hampshire, South West England</td>
<td>2.2%</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>West Clandon, Ockham, Send, Ripley</td>
<td>1.3%</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Basingstoke and Deane</td>
<td>0.7%</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Westborough, Woodbridge Hill</td>
<td>0.4%</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

2.3.3 The data shows that 21.4% of trips would continue into Guildford Town Centre, with 7.5% travelling south along the A281 towards the south of Guildford (including Godalming, Dunsfold, Alford Crossways and Shalford). 4.6% of traffic would travel west along the A31 Farnham Road towards destinations including Farnborough, Aldershot and Farnham, and 10.2% of traffic would travel north across the A3 towards north Guildford, including to the Slyfield Industrial Estate, Jacobs Well and Woking.

2.3.4 Based on the above, as an estimate just 36.4% of total JTW trips would enter the A3 (29.5% travelling northbound towards the M25 and London and 6.9% travelling southbound towards the south coast). A further 16.5% of traffic would cross the A3, which would be distributed between the six key junctions around Guildford and would be dispersed in terms of traffic impact at key individual junctions.

Traffic Impact on A3

2.4.1 Of the total trips in the AM Peak period, applying the percentages in the Table above, just 39 vehicles would be expected to travel to/from the north on the A3, with 10 vehicles expected to travel to/from the south. Of the southbound trips, 7 would exit at The Chase junction towards the Surrey Research Park & Hospital and would therefore exit the A3 within two junctions. In the PM Peak period, a total of 47 vehicles would be expected to travel to/from the north on the
A3, with 11 vehicles travelling to/from the south. Of the Transport & Highways Feasibility Note (300 Units) Land Adjacent to Merrow Park and Ride southbound trips, 7 would exit at The Chase junction towards the Surrey Research Park & Hospital.

2.4.2 Appendix C provides an extract from the Highways England (HE) daily traffic report on the A3 at Guildford (link between A3100 and A320) for the month of March 2018. From this, a neutral week has been analysed over a 7-day period (Monday 12th March 2018 to Sunday 18th March 2018) to establish an average hourly flow on this link. 6,491 two-way vehicles in the AM Peak period and 6,631 two-way vehicles in the PM Peak period are shown, with 72,346 two-way movements across a 12-hour day. This count provides a useful guide as to the level of peak hour flows on the A3; although it is accepted that there will be some variation in traffic flows on the A3 between different junctions.

2.4.3 Table 3 provides a summary of the base traffic movements on the A3 and the percentage impact of potential Clandon related development traffic on this link.

| Table 3: Summary of Highways England Data and Percentage Impact of Potential Development |
|-----------------------------------|-----------------|-----------------|
| Highways England A3 at Guildford Traffic Count | AM Peak period (0600-0900) | PM Peak period (1700-1800) |
| Trip Generation (300 Dwellings) onto A3 | 6,491 | 6,631 |
| Total Flow with Development Traffic | 6,530 | 6,678 |
| Percentage Impact | 0.6% | 0.7% |

2.4.4 With a percentage impact of just 0.6% in the AM Peak period and 0.7% in the PM Peak period, Table 3 demonstrates that the addition of development traffic onto the A3 is clearly marginal, and can be considered well-within the daily variation in traffic flows that would be expected for a trunk road of this nature.

2.5 Traffic Impact on A3 Guildford Junctions

2.5.1 The development will not have a material impact on the A3 as noted above. The junctions leading onto the A3 include the A247 junction, the Clay Lane Junction, the Stoke Junction, the Dennis Junction, the A31 Farnham Road Junction and the Hospital and Cathedral Junction.

2.5.2 Of the traffic which is expected to enter/exit the site, a total of 22 vehicles in the AM Peak period and 25 vehicles in the PM Peak period are anticipated to travel over the A3 to the aforementioned destinations to the north and west of Guildford. Whilst using the A3 junctions, these movements will not be required to enter or exit the A3 directly.

2.5.3 The distribution of traffic means that the 22-25 vehicles will be distributed between the six aforementioned major junctions along this route, and therefore the impact at each junction will be immaterial (for example a maximum of 16 additional movements over an hour at the Clay Lane Junction).

2.5.4 Based on the trip generation and distribution patterns the impact of development traffic at each of the junctions along this route is anticipated to be marginal, and well within the normal, expected daily variation of traffic flows.

Summary

2.5.5 It is reported that the A3 currently experiences high volumes of traffic and periods of congestion at a number of junctions along the Guildford corridor. With such a small volume of traffic calculated to be travelling on or across the A3 from a 300 dwelling development on land adjacent to Merrow Park and Ride it is evident that the effect of development traffic from this site would not have a material impact on the existing operation of the A3, nor any of the junctions accessing onto it. Therefore, this development would be in a valuable position to be delivered in the early stages of the Local Plan, in advance of any planned A3 improvements and would not be dependent on Wider their delivery.
2.6 Wider Traffic Impact

2.6.1 Of the development traffic, 21.4% is anticipated to travel into Guildford Town Centre, with an additional 7.5% travelling through the centre to access the A281 to the south. The total of 28.9% of traffic equates to 39 vehicles in the AM Peak period and 46 vehicles in the PM Peak period.

2.6.2 A total of less than one additional vehicle a minute in the AM and PM Peak periods demonstrates again that the development impact on Guildford Town Centre would be marginal, and within expected daily variations in traffic flows.

2.6.3 It is extremely important to take into account this development’s location in respect of sustainable access for all modes of travel. Located to the east of the town centre and the existing residential area (just 4km from the heart of Guildford) any vehicles travelling into/ out of Guildford would not need to travel on, or via the junctions of the A3 and would therefore not have an impact on the A3, or any of the junctions along its route. Further evidence that the delivery of the site is not dependent on any A3 planned Improvement Schemes.

2.6.4 The location of the site immediately to the east of the existing settlement of Guildford also provides an alternative to the A3 for northbound traffic, should the A3 Improvement Schemes cause temporary congestion along this route. The alternative is the A25/ A246 route on which the site is located, which allows direct access to London and the M25, through East Horsley, Effingham, Great Bookham, Fetcham and Leatherhead.

2.7 Sustainability

2.7.1 The site is located approximately 4km to the east of Guildford Town Centre, and 1km to the east of Merrow Local Centre. The site’s location means that travel by sustainable modes is a realistic alternative to the private car. The proximity to Guildford means that travel to/ from the town centre can be undertaken by a variety of modes; all of which are direct, safe and well established and do not require crossing the A3 (or any other major roads).

2.7.2 Being on the A25 and located immediately adjacent to the established Merrow Park & Ride, the site is already well connected by way of existing bus links. Buses from Merrow Park & Ride run every 15-20 minutes between 07:30 and 19:20, and travel directly into the centre of Guildford taking just 12-15 minutes. Buses are also available to Clandon Station, taking just three minutes, with ample walking & cycling opportunities also available. A summary of the local walking, cycling and public transport opportunities is demonstrated in Figure 1.
2.7.3 There are significant and comprehensive opportunities to encourage walking and cycling into the town centre, as well as to Merrow’s local centre without significant investment in the existing road network to accommodate such facilities. This aligns with the focus of the Guildford Town and Approaches Movement Study (March 2015), which strategy includes:
- Comprehensive network of walking and cycling routes including improved routes to the rail station;
- Pedestrian facilities, improved crossings, shared surfaces;
- Cycle parking and bike sharing/ cycle hire schemes;
- Park and Ride facilities.

2.7.4 The site is suitably sustainable to encourage walking, cycling and public transport travel without reliance on the private car; particularly for journeys into Guildford Town Centre and local facilities.

Attached documents: [Main Modifications Reps Combined_Redacted.pdf](6.1 MB)

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**Comment:** MM27 - LPMM18/1480  **Respondent:** Commercial Estates Group 20691297  **Agent:** Nexus Planning (Adam Ross)

**MM27 – Policy para (2)**

We agree with and support the proposed change at MM27 which identifies the potential need for a Local Plan Review in the event of material delay of anticipated RIS schemes in the Borough. Given the significant uncertainties in terms of both the funding for and timing of such key strategic road improvements, and notwithstanding the requirement of paragraph 33 of the NPPF 2018 which requires that Local Plans are reviewed no later than 5 years from the adoption date of the Plan, we consider that the Council is right to specifically acknowledge that material delays in the delivery of RIS 1 schemes should in any event specifically trigger a review of the Local Plan.

Attached documents: [Main Modifications Reps Combined_Redacted.pdf](6.1 MB)

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**Comment:** MM39 - LPMM18/1481  **Respondent:** Commercial Estates Group 20691297  **Agent:** Nexus Planning (Adam Ross)

**MM39 – Land at Aaron’s Hill, Godalming**

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

As also identified in our representations to MM2, it is also unjustified and unsound to re-categorise the Aarons Hill site from Tier 10 (as it was in the SA Report submitted with the Local Plan) to Tier 8 in the SA Addendum. This illogically and unjustifiably suggests that this urban extension to the small town of Godalming is as sustainable as an urban extension to Guildford (which is 6 times larger and the county town of Surrey) and results in this site being inappropriately favoured in the SA assessment process. Importantly, it results in the unnecessary allocation of this site at the expenses of the significantly more sustainable option at Clandon Golf.

**Changes Required**
For the reasons set out in detail in our representation to MM2, the revised spatial strategy (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents:  Main Modifications Reps Combined Redacted.pdf (6.1 MB)

Comment: MM43 - LPMM18/1484  Respondent: Commercial Estates Group 20691297   Agent: Nexus Planning (Adam Ross)

MM43 – Land at Hornhatch Farm, Chilworth

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

Changes Required

For the reasons set out in our representations to MM2, the revised spatial strategy established by MM2 (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents:  Main Modifications Reps Combined Redacted.pdf (6.1 MB)

Comment: MM44 - LPMM18/1487  Respondent: Commercial Estates Group 20691297   Agent: Nexus Planning (Adam Ross)

MM44 – Land west of Alderton’s Farm, Send

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

Changes Required
For the reasons set out in detail in our representation to MM2, the revised spatial strategy (and specifically the allocation of the sites identified in MM39, 43, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents:  
Main Modifications Reps Combined_Redacted.pdf (6.1 MB)

Comment:  
MM45 - LPMM18/1488  
Respondent: Commercial Estates Group 20691297  
Agent: Nexus Planning (Adam Ross)

MM45 – Land between Glaziers Lane and Strawberry Farm, Flexford

For the reasons set out in our detailed representations to MM2, the proposed allocation of this site is unjustified given the Council’s evidence in the SA Addendum 2018, and is contrary to the Council’s own spatial hierarchy / approach given its failure to allocate the deliverable, more sustainable and sequentially preferable site at Clandon Golf (as an urban extension to Guildford).

Changes Required

For the reasons set out in detail in our representation to MM2, the revised spatial strategy (and specifically the allocation of the sites identified in MM39, 44 and 45) is unjustified and unsound.

The Council must re-visit the strategy to allocate additional sites to deliver in the first five years of the Local Plan (post-adoption) and base its decisions on clear evidence (most notably the SA Addendum) and its own spatial hierarchy / approach. This will result, on the Council’s own evidence, in the identification of a different development option (and therefore a different suite of sites) to those now proposed. It will also, most importantly, result in a more sustainable distribution of development (on the Council’s own terms).

Attached documents:  
Main Modifications Reps Combined_Redacted.pdf (6.1 MB)

Comment:  
MM27 - LPMM18/1503  
Respondent: Mrs Corinne Singleton 20692385  
Agent:  
I object to the proposals as the extra traffic that will come as result of the plans will have a huge impact on our roads, with increased nitrogen dioxide pollution, delays, increased traffic jams which are already ridiculous and increased noise.

These comments should also be applied to MM42 and MM48.

Attached documents:

Comment:  
MM41 - LPMM18/1490  
Respondent: Mrs Corinne Singleton 20692385  
Agent:
I object to the proposed plan and would like it explained why you have decided to increase the number of proposed homes from 400 to 550 - an increase of 37%? Clearly, you have decided to totally ignore the 7000 objections already submitted to the earlier proposal of 400 new homes!

The proposal completing ignores the fact that you would be building on ancient woodland and in the green belt.

This will mean that Send and Ripley will be joined up and means that the area will be over developed.

This site is also prone to flooding and is contaminated by lead shot, clearly not the area to build new homes on.

Clearly, you have not taken into account the impact these proposals would have on the local roads which are already extremely busy. I hope that you would also be building a new medical centre and school to serve and support the plans, although somehow I doubt it!

Attached documents:

**Comment:** MM42 - LPMM18/1494  **Respondent:** Mrs Corinne Singleton 20692385  **Agent:**

I object to these plans as follows:

The proposal appears not to take into account when there is unused capacity at Slyfield. There are no special circumstances for this proposal and therefore contradicts MM9

Again it is not clear why this proposal has increased the site to be increased from the 2014 plan from 7000 to 14800 square feet?

Attached documents:

**Comment:** MM44 - LPMM18/1497  **Respondent:** Mrs Corinne Singleton 20692385  **Agent:**

I object to these proposals as follows:

It is green belt land and there are no special circumstances for it to be used in this was and therefore contradicts policy MM9

The proposal will increase the traffic to the already extremely busy roads in particular Send Crossroads

If you add the 550 at Garlicks Arch, Winds Ridge 40, Clockbarn 60 it totally 770 houses to the 1700 currently in Send which gives an increase of 45%. It is clear that this is too much for the current infrastructure.

Attached documents:

**Comment:** MM9 - LPMM18/1498  **Respondent:** Mrs Corinne Singleton 20692385  **Agent:**
I object the the proposals as although it's suggested that the modifications will protect the green belt it doesn't seem that will happen.

Attached documents:

**Comment:** MM2 - LPMM18/1495  **Respondent:** Mrs Lesley Tregaskes 20692737  **Agent:**

Dear Sirs

I **OBJECT** to Guildford Planning Policy as it refers to **Site A35** and I support the representation made by WAG.

Firstly, why, after a public enquiry and the Secretary of State’s robust refusal of planning permission, has GBC chosen to keep this site within the local plan? Specifically in reaching the decision to refuse planning permission, both the Inspector and the Secretary of State gave considerable weight to harm to the Green Belt, damage to heritage assets, the severe impact on the strategic road network and permanent harm to view from the Surrey Hills AONB. That refusal was published on 13th June 2018 and yet shortly thereafter the Local Plan was submitted including a development of essentially the same scale on essentially the same area, despite official household projections on which the Local Plan was based being reduced by 40%

I would point out that the addition of land to the south of the appeal site does not mitigate the density issue as much of that new land is constrained by the VOR which prevents construction within a certain radius. That land abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hills AONB.

The Examiner’s decision on Site Policy A35 was made within a few minutes after the closing of the public hearing and he could not possibly have had the time to properly consider and assess all of the arguments presented during that day. This appears to be a clear case of pre-determination.

In the light of all the above, I wish to call for the examination in public to be re-opened so that the inter alia the latest Office of National Statistics can be used.

Attached documents:

**Comment:** MM2 - LPMM18/1499  **Respondent:** Mrs Lesley Tregaskes 20692737  **Agent:**

I **OBJECT** to the GBC Local Plan on the following grounds.

**MM2** The housing target is wrong in that on 20th September the Office of National Statistics released new household growth projections for Guildford reducing the figure by 40.5%, following their population projections released in May which clearly foreshadowed a substantial drop in the household projection. There should also be no requirement for Guildford to take Woking’s unmet housing need. As there are very large discrepancies between the Plan and the up to date Office of National Statistics household data the **Public Examination of the Plan by the Planning Inspector must be reopened.**

Attached documents:

**Comment:** MM3 - LPMM18/1501  **Respondent:** Mrs Lesley Tregaskes 20692737  **Agent:**
New Policy S3 on the town centre (MM3) The Town Centre policy is imprecise and fails to specify what is planned for the town. Yet, as the Council itself acknowledges, the town centre is the largest and most sustainable location in the borough.

Attached documents:

Comment: MM50 - LPMM18/1496  Respondent: Mrs Lesley Tregaskes 20692737  Agent:

Also, under MM47 there is no justification for altering the SNCI boundary, drastically reducing its size – despite the whole site qualifying on ecological grounds. There is also a breach of case law as an Appropriate Assessment and a Habitats Regulation Assessment have not been completed.

Attached documents:

Comment: MM9 - LPMM18/1500  Respondent: Mrs Lesley Tregaskes 20692737  Agent:

Policy P2 – Green Belt insetting  The evidence against, and deficiencies in, the Pegasus Planning Group Greenbelt and Countryside Study used by GBC to justify village insetting were openly acknowledged by the examiner at the public hearing, yet in his summing up in July he found the Green Belt proposals to be basically sound. Given those deficiencies, the absence of any one village being proposed for removal from insetting implies that the examination may have been no more than a token exercise. The examiner suggested that the Horsleys parish councils should meet with GBC and review deficiencies in the insetting justification but GBC refused on the grounds that it was unnecessary. I therefore concur with EHPC that the proposed insetting of East Horsley from the Green Belt is unsound and should be removed from the list of proposed inset villages.

Attached documents:

Comment: MM9 - LPMM18/1502  Respondent: Mrs Lesley Tregaskes 20692737  Agent:

Policy P2: Green Belt (MM9)  66% of the proposed housing is planned to be built on land currently within the Green Belt when the exceptional circumstances necessary to amend Green Belt boundaries or the very special circumstances necessary to justify any development in the Green Belt do not exist. Why is the Council not proposing to use the largest and most sustainable location for a greater part of the housing need, especially bearing in mind that an increasing large part of the retail market for goods and services is conducted on line and there is therefore less need for retail premises?

Attached documents:

Comment: MM2 - LPMM18/3258  Respondent: Ms. (Ms Maria Schirmer) 20698529  Agent:

My objections are to: MM9, MM27, MM41, MM42, MM44 and MM48
At the public examination, the figure for GBC housing needs used by the inspector was 789 per year; a figure obtained by G.B.C Consultants which was inflated by including students from the University of Surrey. The Consultants and GBC have refused to disclose how this figure was calculated so one can only guess at the accuracy of it.

However, subsequent and more accurate figures published by consultancy Barton Wilmore, said the correct figure is 431 houses per year with data from the Office of National Statistics (a very reputable body), doing population forecasts saying the appropriate growth in GBC can be achieved by 460 houses per year; supporting the figures published by Barton Wilmore.

This latest data makes a mockery of G.B.C consultant’s figures which have always been very suspect, especially given their reluctance to disclose their calculations.

Therefore, given the data from both the Office of National Statistics and Barton Wilmore; I hope that Guildford Borough Council and the Inspector will now significantly reduce the housing needs to reflect the true figures, especially given the fact that Send already is congested and functioning with an "at capacity" infrastructure.

Attached documents:

**Comment:** MM27 - LPMM18/3259  **Respondent:** Ms. (Ms Maria Schirmer) 20698529  **Agent:**

**MM27. MM41, MM42, and MM48 Transport Strategy.**

The roads in and around Send, Send Marsh, Ripley, Burnt Common etc are already running at capacity. They will not cope with the addition of what potentially would be hundreds if not thousands more cars; never mind the hugely negative impact on the environment; has this been considered?

This massive increase in traffic of all types of vehicles, not just cars, heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise and air pollution. Furthermore delays and gridlock are going to be worse than they already are.

Attached documents:

**Comment:** MM41 - LPMM18/3260  **Respondent:** Ms. (Ms Maria Schirmer) 20698529  **Agent:**

**MM27. MM41, MM42, and MM48 Transport Strategy.**

The roads in and around Send, Send Marsh, Ripley, Burnt Common etc are already running at capacity. They will not cope with the addition of what potentially would be hundreds if not thousands more cars; never mind the hugely negative impact on the environment; has this been considered?

This massive increase in traffic of all types of vehicles, not just cars, heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise and air pollution. Furthermore delays and gridlock are going to be worse than they already are.

Attached documents:
**Comment: MM41 - LPMM18/3262  Respondent: Ms. (Ms Maria Schirmer) 20698529  Agent:**

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43.**

I very strongly object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.

Whilst I understand the need for more housing, this is a huge increase of 37.5% in the number of houses to be built. The infrastructure is not coping as it is and it will totally collapse with this increase. Until the current infrastructure has been assessed and improved to cope with its existing needs, then the addition of that number of additional houses is simply senseless and preposterous. Building this vast number of houses will result in the villages of Ripley and Send being joined is in fact over development.

Furthermore, that precious ancient woodland (which should be protected not developed) cannot ever be replaced once gone. The environmental impact on wildlife (some protected species) cannot be reversed once the damage is done. What future environment are we building for our children?

I find it incomprehensible that the previous objections (I gather over 7000) to the earlier plan appear to have been totally ignored and if anything it seems that we are actually being punished for our objections, what with the threat of even more houses etc to be built than were in the original plans?

**Attached documents:**

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**Comment: MM42 - LPMM18/3263  Respondent: Ms. (Ms Maria Schirmer) 20698529  Agent:**

**MM42. Land at Burnt Common, London Road, Send Policy A58.**

There is no need for a new large industrial estate to be built (be it in Send or wherever) when Slyfield not only have unused capacity but have also said they are able and willing to expand. Any development, but especially one the size of 14,800sq m would result in an colossal increase in traffic, especially HGV’s and larger vans with emissions that are already at high levels becoming even more dangerous.

There are NO SPECIAL CIRCUMSTANCES which would deem this develop necessary so it totally contradicts MM9 (also bearing in mind that the ELNA showed a reduction in need for industrial land, not an increase). Send business centre is increasing by 25%; sufficient development for a village the size of Send; we don't need more.

And again, it would appear that people who originally objected are being punished for their views as MM42 too is now marked for a development double the size of the original plans. Also why was this plan deleted from the 2014 plans and then reinstated, and in that process increased as much as it has?

**Attached documents:**

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**Comment: MM42 - LPMM18/3267  Respondent: Ms. (Ms Maria Schirmer) 20698529  Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy.**

The roads in and around Send, Send Marsh, Ripley, Burnt Common etc are already running at capacity. They will not cope with the addition of what potentially would be hundreds if not thousands more cars; never mind the hugely negative impact on the environment; has this been considered?
This massive increase in traffic of all types of vehicles, not just cars, heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise and air pollution. Furthermore delays and gridlock are going to be worse than they already are.

Attached documents:

Comment: MM44 - LPMM18/3264  Respondent: Ms. (Ms Maria Schirmer) 20698529  Agent:

**MM44 Land at Aldertons Farm, Send Road, Policy A63.**

What with Garlicks Arch (550), Winds Ridge (40) and Clockbarn (60) this development would mean a total additional 770 houses to be built, compared to the 1700 currently in Send. That is a totally disproportionate increase of 45%. Again; the current infrastructure just CANNOT cope. The roads in Send Marsh are narrow and will not be able to cope with the increased traffic and again the environmental impact of the additional car emissions will be horrendous; it’s bad enough as it is.

And again this is precious GREEN BELT and with NO special circumstances this plan too contradicts policy MM9.

Attached documents:

Comment: MM48 - LPMM18/3261  Respondent: Ms. (Ms Maria Schirmer) 20698529  Agent:

**MM27, MM41, MM42, and MM48 Transport Strategy.**

The roads in and around Send, Send Marsh, Ripley, Burnt Common etc are already running at capacity. They will not cope with the addition of what potentially would be hundreds if not thousands more cars; never mind the hugely negative impact on the environment; has this been considered?

This massive increase in traffic of all types of vehicles, not just cars, heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise and air pollution. Furthermore delays and gridlock are going to be worse than they already are.

Attached documents:

Comment: MM9 - LPMM18/3265  Respondent: Ms. (Ms Maria Schirmer) 20698529  Agent:

**MM9 GREEN BELT POLICY.**

According to GBC MM9 / Policy Para 1… “The Metropolitan Green Belt, as designated on the Policies Map, will continue to be protected against inappropriate development in accordance with the NPPF. Development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”
That itself speaks volumes and shows that proposals MM42 and MM44 are in total contradiction to the promise made by MM9 as there is NO NEED for neither a huge industrial estate, nor the additional 120 houses (on top of the other 550).
So just how can you say the modifications claim to PROTECT our precious Green Belt, when MM42 and MM44 are doing the complete opposite?

Limited infilling seems to be an easy cop out for GBC; resulting in virtually any land on the (what will be) ever increasing edges of the village at risk of being bought by developers with no regard whatsoever for any impact it may have on the current infrastructure and environment.

Attached documents:

Comment: MM2 - LPMM18/1587  Respondent: Graham and Elizabeth Richings  20698689   Agent:

I would like to make a comment on the Guildford Local Plan that is currently being considered. Because the Office of National Statics has reappraised various figures since this plan was submitted to the Planning Inspector it may well be that too many houses have been put into the plan. I consider that the whole plan should be reappraised with a view to substantially reducing the number of houses needed. ~This may well save some of the Green Belt that was being sacrificed for housing. In the interests of the environment we need as much green space and trees etc.

Guildford Borough Council has indicated that a large estate maybe build on land at Slyfield Green. Was the number of houses planned for this site included in the Guildford Plan? If not then there is even more reason/excuse to protect even more Green Belt. Was the housing planned on the Railway Station site included in the original figure. If not we need even less housing taking this into account. These all good reasons for looking at the plan again. Maybe any final decision should be left until after Brexit has been settled because we shall have more idea what the future population forecasts will be. Immigration has an impact on any calculations for future housing. Currently about 300,000 people net are coming into the country annually and this may drop substantial. after Brexit, again making a need for less housing. We need to do all that we can to keep housing figures down in the interests of preserving the Green Belt and Surrey countryside.

If this is done then I believe that it should be made transparent as to how any new calculations are carried out so that the public are fully aware of the basis that any housing need figure is arrived at. We were kept in the dark when the current plan was being put together.

Please add this comment to any others that you have

Attached documents:

Comment: MM2 - LPMM18/1588  Respondent: Mr Keith Weed  20698721   Agent:

With respect to proposed activity on the Wisley airfield in Ockham. I have been advised previously of the consultation but seem to no longer be receiving emails. I have been alerted of further developments by a friend. Can you please still keep me briefed. I am concerned to hear of further developments being considered, can the examination in public be reopened so the latest office of National statistics can be used

I support the representations made by WAG with advice from Richard Harwood QC.

Attached documents:
**Comment: MM13 - LPMM18/5934  Respondent: Dirk Mercer 20699553  Agent:**

MM13

There is too much allocation for retail in the town centre. The evidence base on retail is very out-of-date. More sustainable housing could be allocated in its place.

**Attached documents:**

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**Comment: MM2 - LPMM18/5931  Respondent: Dirk Mercer 20699553  Agent:**

Re: Guildford Local Plan: Strategy & Sites - Main Modifications 2018-Sept 2018

I **object** to the following policies as amended by the main modifications of the above plan:-

**MM2-Number of houses**

I strongly object to this policy for the following reasons.

The method of counting the requirement and the assumptions used to come up with the final figures is wrong and therefore the policy is flawed. As a result, the Public examination hearing must be re-opened to take account of the up to date ONS figures and household projections data. This is vital because the new ONS figures as recently published, reduced the projected growth in households for Guildford by 40.5%. This is extremely important and significant. It represents a reduction of 4507 households required for the plan period 2015-2034 and represents well over the 2 large ‘strategic sites’ included in the current Plan.

Guildford Borough Council should have seen this change and should have reduced housing numbers because of the ONS population projections in May 2018. Puzzlingly, it actually increased the number of houses in the current version of the Plan.

In addition I am equally astonished and appalled by the proposal that the voters and tax-payers of Guildford, should be forced to take Woking’s unmet housing need, especially as this would require further greenbelt release. Indeed, if we follow this logic to its ultimate conclusion, this could make the voters of Guildford take any other other council’s unmet housing need, from anywhere in the country. This is clearly unacceptable and wrong!

GBC has not properly followed its own spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield, before moving on to land in the villages or Green Belt. The addition of another 500 houses in Send,( which will be car dependent ) would have a severe impact on Portsmouth Road, Ripley which has not been properly considered.

**Attached documents:**

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**Comment: MM23 - LPMM18/5936  Respondent: Dirk Mercer 20699553  Agent:**

**MM23(D1)**

The requirement for the strategic sites to be sustainable for residents who need to walk or cycle and cannot rely on cars to transport them has been reduced in the amended Plan. It cannot be right to propose development which might well
exclude a portion of the population, i.e those who do not wish to, or can’t rely on motor transport to socialise or travel to work (cycle to a station or place of work). These factors should be a significant consideration/requirement in this policy.

This policy states the constraints on design should not be considered in respect of Strategic sites. This is wrong. The Council should commit to a standard of design to protect the borough as a whole.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM3 - LPMM18/5933</th>
<th>Respondent: Dirk Mercer 20699553</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>MM3-(S3) Town centre Policy</strong></td>
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<td>The town centre policy is inadequate. It fails to specify what is planned for the town, is far too general and imprecise and does not address the infrastructure deficit.</td>
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<td>The policy falls well short of a commitment to planning for houses for residents, which could accommodate more people and produce more in social housing. If inadequate housing as allocated for people in the centre, Guildford will become a wasteland of fast-food shops and tacky chains of cheap clothing and tat.</td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment: MM35 - LPMM18/5939</th>
<th>Respondent: Dirk Mercer 20699553</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>MM35-Site A25 Gosden Hill Farm</strong></td>
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<td>I object to this strategic site because Gosden Hill is located entirely in Green Belt land. No exceptional circumstances under NPPF have been shown to allow for development of the land on this site or for this land to be removed from Green Belt.</td>
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<td>This part of the Green Belt protects Guildford from urban sprawl, a prime purpose of the Green Belt.</td>
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<td>A development of 1800 houses is not needed because it is based on out of date housing need figures. I refer to the updated ONS figures of reduced population and household statistics for Guildford during the Plan period, made known from May 2018.</td>
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<td>Any restructuring of local roads as part of any development would have a severe detrimental impact on an already congested area. It would impact on all surrounding roads connecting Guildford.</td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment: MM36 - LPMM18/5940</th>
<th>Respondent: Dirk Mercer 20699553</th>
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<tr>
<td><strong>MM36-A26 Blackwell Farm</strong></td>
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I object to this Strategic site because Blackwell Farm is located entirely in Green Belt. No exceptional circumstances have been demonstrated to justify proposed development on this land under the NPPF, or for the land to be removed from Green Belt.

This land at this site fulfils all 5 important functions of the Green Belt, prevents urban sprawl around Guildford and provides a vital “lung” to protect us from pollution, harmful effects of inappropriate development and traffic congestion.

The development of 1800 houses is not needed as it is based on out of date figures for household projections for the borough. These have been reduced substantially by 40.5%.

Attached documents:

Comment: MM40 - LPMM18/5937  Respondent: Dirk Mercer 20699553  Agent:

SPECIFIC SITES

MM40 (A35) Three Farms Meadows aka Wisley Airfield

I object to this Strategic site.

The Plan includes here Policy A35 for a development on essentially the same scale on Wisley Airfield as that was rejected by the Secretary of State on 13th June 2018. The Council's decision to refuse permission for the planning application 15/P/00012 was upheld by the Secretary of State and the planning appeal was dismissed.

This Site with proposed development of 2000 houses, and similar in scale to that of the above planning appeal, has been inserted again in the proposed Local Plan. It is based on the above planning application which was proposed by developers, rejected by GBC and refused by the government only 3 months ago. It is wrong to repeatedly include it using at best, questionable figures. This is in essence attempting to frustrate the will of the electorate and the Secretary of State.

The proposed number of houses and scale of development as suggested on this site would still be wholly inappropriate for the area, the site being in the Green Belt. Many issues and objections have been raised by residents and the Council in response to the appeal dismissed in June 2018. These remain the same or are not sufficiently mitigated.

In my opinion, it does not make sense to base the development of this site on household projections that have been reduced by 40.5%.

The addition of other new land to the south of the appeal site does not mitigate the density problems as much of that land is constrained by the VOR.

The land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the SurreyHill AONB.

Attached documents:

Comment: MM41 - LPMM18/5935  Respondent: Dirk Mercer 20699553  Agent:

MM41
The transport strategy relies on inadequate infrastructure modelling including the Highways England Junction 10 scheme delayed for at least 2 years. The impact this will have on certain development sites specified in the Plan which rely on this scheme may be severe and has not been given proper consideration in the policy.

The Council is relying too much on the A3 Guildford improvements that are not under their control and that have no fixed time scale.

**MM41 Site 43 Garlick’s Arch- Send Marsh**

I object to the policy to develop this site which is in Green Belt. No exceptional circumstances have been proven to justify removing the land from Green Belt.

There is no guarantee that the houses to be built here will be more affordable if the Plan increases the numbers of homes built. All new homes built in this part of the country are very expensive.

It will cause severe traffic congestion in Send and Ripley where roads are already at capacity.

The need for this development is not proven and is based on incorrect household projections. This site along with other sites marked in the Plan should be reconsidered using up to date ONS figures (Sept 2018).

**Attached documents:**

**Comment: MM50 - LPMM18/6256  Respondent: Dirk Mercer 20699553  Agent:**

**MM47** - the size of the SNCI (Site of Nature Conservation Importance) has been drastically reduced (to about 15-20% of its former size). This is unacceptable since the whole site qualifies as an SNCI on ecological grounds. There is no justification for altering the SNCI boundary.

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed, in breach of case law.

I would argue that any development of this site and especially of the scale stipulated in the Plan will be in breach of current NPPF law in particular that of the required principle to preserve the openness of the Green Belt. (paras 79-90). Any harm by inappropriate development will prevent the preservation of openness of the Green Belt- Case law Boot v Elmbridge Borough Council Feb 2017.

**Attached documents:**

**Comment: MM51 - LPMM18/1612  Respondent: Dirk Mercer 20699553  Agent:**

Re: Guildford Local Plan: Strategy & Sites-Main Modifications 2018-Sept 2018

AND

Re: Amendment 1: Horsley-West Horsley (South) (MM51)- map page 84
I write to you to confirm that I give my **firm approval** of the above modification of the village settlement boundary i.e that it has been brought back to Silkmore Lane’s property boundary.

This will protect the Green Belt land and valued rural character of the village of West Horsley.

**Attached documents:**

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**Comment: MM9 - LPMM18/5932  Respondent: Dirk Mercer 20699553  Agent:**

**MM9-Green Belt**

This policy has not taken into account the large reduction in projected households (see MM2 above).

Despite previous promises to the residents to protect the Green Belt in the borough, 66% of the Plan’s proposed housing is planned to be built on land that currently lies within the Green Belt.

In view of the reduced housing projections from ONS, and the Plan stating that “more housing is likely to come forward over the plan period” (being an unknown quantity), the **exceptional circumstances necessary to amend Green Belt boundaries OR the very special circumstances necessary to justify any development in the Green Belt do not exist**, especially as

- 66% of the planned development is on land currently in the Green Belt
- The new policy S3 on the town centre (largest and most sustainable location in the borough and with more urban and brownfield sites available) is weak and unacceptable.

I strongly object to the current proposals and insist that GBC to commits in the Plan to protecting the Green Belt pursuant to NPPF 2012 (the current planning law). The current version of the Plan where it proposes infilling in and around villages will result in a weakening of the protection of the countryside. It will directly impact the Green Belt around Guildford which is an important green “lung” for this borough. It will create urban sprawl contrary to the principles of Green Belt policy in the NPPF.

**Attached documents:**

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**Comment: MM2 - LPMM18/1676  Respondent: Malcolm & Marcia Sorrell 20700097  Agent:**

Comments on local plan.

The Local Plan is unsound because:

Housing numbers should reflect the latest ONS population projections. There are technical reasons why these may still be an over estimate of future population estimates - simply, based on assumed fertility rates of younger age groups as they age, however, being a university time it is unlikely a significant proportion of the younger age group will remain locally.

Guildford must have an effective Local Plan. Development rules must ensure quality of development across the town centre to prevent piecemeal development.

**Attached documents:**
Comment: MM3 - LPMM18/1678  Respondent: Malcolm & Marcia Sorrell 20700097  Agent:

Policy S3. Guildford Borough Council should adopt Guildford Vision Group's proposals, including a new crossing, or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM2 - LPMM18/1712  Respondent: Stephen Rossides 20700577  Agent:

On behalf of my family, I wish to make the following comments on the Draft Guildford Local Plan:

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined,

Attached documents:

Comment: MM23 - LPMM18/1715  Respondent: Stephen Rossides 20700577  Agent:

MM23 policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority

In summary:

The current draft of the Local Plan is unsound because:-

1. The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.
2. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
3. Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.
4. There is no policy dealing with urban areas beyond the town centre such as the one where we live.
5. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

Attached documents:

**Comment: MM27 - LPMM18/1714**  **Respondent: Stephen Rossides 20700577**  **Agent:**

MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

Attached documents:

**Comment: MM3 - LPMM18/1713**  **Respondent: Stephen Rossides 20700577**  **Agent:**

MM3 policy S3. Guildford Borough Council must deliver real and coordinated results.

The town centre must be designated a strategic site, or sites.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

Attached documents:

**Comment: MM2 - LPMM18/2476**  **Respondent: Stephen and Audrey Hofmeyr 20700705**  **Agent:**

MM2 - policy S2

The scale of the increase in housing included in the plan would have an important impact deleterious on our town, in general, and our local Tyting area, in particular, which is accessed by two narrow single tracked lanes. Increased traffic will be difficult to handle without loss of existing character.
We ask that the housing target be reduced, for the reasons set out below.

The examination should be re-opened because the housing figures should be revised in the light of the new ONS forecasts of population and households. The stated housing requirement is not a sound basis for the Local Plan or justification for such an extensive loss of Green Belt land.

We are therefore concerned about the specific development proposed at Hornhatch Farm in Chilworth, just south of where we live and accessed from Guildford by the narrow country lanes. (MM43). There is a strong case for taking out this strategic site and more scope for better town centre provision. This makes table (S2), which identifies types of site to be developed, out of date and in need of re-examination.

Independent expert, Neil MacDonald, has demonstrated that 360 homes per year would support the ambitious economic growth rate proposed by the Inspector. 630 homes a year is out of step with the new ONS figures and the Government's new standard methodology. 630 is based on inappropriate assumptions that inflate the figures due to excessive allowance for student homes and their low economic participation.

Further, it is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained. The number of houses needed in Woking has also been reduced and has also not been re-examined.

**MM43 - Hornhatch Farm, Chilworth**

As set out in MM2 above the much lower projection of housing needs removes the necessity to bite into the Green Belt and the development of this site.

In conclusion, our local residents’ association, the Tyting Society, will be putting in a separate response. We support that response.

**Attached documents:**

**Comment:** MM3 - LPMM18/1717  **Respondent:** Stephen and Audrey Hofmeyr 20700705  **Agent:**

My wife and I (and our family) live within Guildford, 1 km from the centre. We live on the edge of AONB land and are very fortunate to have uninterrupted views of the highly significant fields and countryside which surround our town and make it such a pleasant place to live. Our particular concerns relate to MM2, MM3 and MM43 which are outlined below.

We deal with MM2 and MM43 together as they are related. We begin with MM3.

**MM3 - policy S3**

Guildford Borough Council must deliver real and co-ordinated results. The Guildford town centre must be designated a strategic site or sites. At the moment, the Council does not appreciate or chooses to ignore the strength of local public opinion.

Guildford Borough Council should adopt the Guildford Vision Group proposals, including a new crossing or equivalent effective alternative so as to deliver a safer pedestrianised town centre with transport resilience and opened riverside. This is vital to the future of the town of Guildford. The approach adopted to the town centre by the Council has been unplanned and cavalier to date. This in the face of a carefully, professionally prepared proposal from the Guildford Vision Group, which has widespread support in Guildford. We deserve better from our Council. They should work with, not against, the local residents.

**Attached documents:**
**Comment:** MM43 - LPMM18/1719  **Respondent:** Stephen and Audrey Hofmeyr 20700705  **Agent:**

**MM43 - Hornhatch Farm, Chilworth**

As set out in MM2 above the much lower projection of housing needs removes the necessity to bite into the Green Belt and the development of this site.

In conclusion, our local residents’ association, the Tyting Society, will be putting in a separate response. We support that response.

**Attached documents:**

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**Comment:** MM27 - LPMM18/1720  **Respondent:** Richard Duddy 20700801  **Agent:**

How are these proposals going to improve the already crowded roads and reduce the current high pollution levels, because certainly your transport strategy MM27, MM41, MM42 & MM48 does not deal with these issues.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/1721  **Respondent:** Richard Duddy 20700801  **Agent:**

How are these proposals going to improve the already crowded roads and reduce the current high pollution levels, because certainly your transport strategy MM27, MM41, MM42 & MM48 does not deal with these issues.

**Attached documents:**

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**Comment:** MM42 - LPMM18/1722  **Respondent:** Richard Duddy 20700801  **Agent:**

How are these proposals going to improve the already crowded roads and reduce the current high pollution levels, because certainly your transport strategy MM27, MM41, MM42 & MM48 does not deal with these issues.

**Attached documents:**

---

**Comment:** MM48 - LPMM18/1723  **Respondent:** Richard Duddy 20700801  **Agent:**

How are these proposals going to improve the already crowded roads and reduce the current high pollution levels, because certainly your transport strategy MM27, MM41, MM42 & MM48 does not deal with these issues.

**Attached documents:**
We wish to make the following points/objections to the Current Local Plan, because the current draft is unsound.

The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.

The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.

There is no policy dealing with urban areas beyond the town centre such as the one where we live.

There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford’s control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

Specifically:

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined,

Attached documents:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.
MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority.

**Attached documents:**

**Comment:** MM27 - LPMM18/1741  **Respondent:** Karen and Marcus Browne 20700929  **Agent:**

MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

**Attached documents:**

**Comment:** MM3 - LPMM18/1737  **Respondent:** Karen and Marcus Browne 20700929  **Agent:**

MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

**Attached documents:**

**Comment:** MM37 - LPMM18/1742  **Respondent:** Karen and Marcus Browne 20700929  **Agent:**

MM37 The proposed land for an access road between the A31 and **Blackwell Farm** would harm the AONB.

**Attached documents:**
We wish to make the following points/objections to the Current Local Plan, because the current draft is unsound.

The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.

The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.

There is no policy dealing with urban areas beyond the town centre such as the one where we live.

There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford’s control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

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MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

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MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority.

**Attached documents:**

**Comment:** MM27 - LPMM18/1747 **Respondent:** Matthew Browne 20700993  **Agent:**

MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

**Attached documents:**

**Comment:** MM3 - LPMM18/1745 **Respondent:** Matthew Browne 20700993  **Agent:**

MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

**Attached documents:**

**Comment:** MM37 - LPMM18/1748 **Respondent:** Matthew Browne 20700993  **Agent:**

MM37 The proposed land for an access road between the A31 and **Blackwell Farm** would harm the AONB.

**Attached documents:**
Comment: MM2 - LPMM18/1761  
**Respondent:** Hazel Jarvis 20701217  
**Agent:**

The ONS has published revised forecasts of population and households for Local Authorities over the past few months. These show a significantly different position in Guildford in 2034 compared to the 2016 forecasts. Analysis carried out by Neil McDonald on behalf of Guildford Residents Associations demonstrates the need for new housing is substantially lower than the target of 630 dwellings per annum included in the Plan.

We therefore ask that the Inspector reopen the hearing to examine this fundamental issue in the light of the new evidence because of its huge significance for the Plan.

**Attached documents:**

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Comment: MM2 - LPMM18/1762  
**Respondent:** Fiona Clayton 20701249  
**Agent:**

I am concerned about the validity of the Guildford Local Plan and feel that many parts are deeply worrying and indeed not fit for purpose.

**Of deepest concern…**

Why is the council looking to develop the green belt when the brownfield sites of Guildford centre have not been fully explored or considered?

The councils plan totally relies on the redevelopment of the A3 which is outside of the councils control and is certainly not 'a given'.

What would happen if the proposed development is abandoned by government?

As a result the town centre policy S3 is completely inadequate.

Housing numbers should reflect the latest ONS figures. They do not.

The grounds for green belt development stated DO NOT represent 'EXCEPTIONAL CIRCUMSTANCES'

Right now we have once in a life time chance to get this right and develop a town centre fit for purpose in the 21st century.

With a bit of clear thinking and forward planning the council can get this right.

Harness the good will and exceptional professional talents of people who love this town and create a modern functioning town with a vibrant fully functioning centre.

**Attached documents:**

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Comment: MM51 - LPMM18/1772  
**Respondent:** Mr and Mrs Williams 20701409  
**Agent:**

We are writing to confirm our approval of the modification to the proposed Greenbelt boundary and village settlement boundary, bringing it back to Silkmore Lane’s ‘defensible’ property boundary.
We must protect our land from further housing development as the village and road infrastructure just cannot support this. We are desperate to protect our village and conserve the beautiful green spaces around us that support a host of wildlife and provide wonderful recreational facilities for our children and animals.

We fully support the modification and will strongly object to any development of the surrounding fields backing on to Silkmore Lane.

Our sewers and water mains are plagued by problems as they are aged in the clay heavy soils as are the rotting gas pipes. Our roads are continuously being dug up to patch repair here and there. Additional new housing would put added pressure on these antiquated services to our homes, which is another reason for our objection to further new housing in the immediate vicinity.

Attached documents:

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Comment: MM45 - LPMM18/1774  Respondent: Andrew Shaw 20701441  Agent:

I write to object to the proposal to build 105 houses north of the railway line east of Glaziers Lane. The reasons for my objection are that it involves building on Green Belt land where there would not appear to be any exceptional circumstances for such encroachment, the road is unsuitable for the extra traffic that would be generated both during and after construction, the sewage system in Normandy is already overloaded and the new homeowners would increase pressure on the doctors surgery and local school. The effects on the surgery is of particular concern as it cannot cope with current demand – a wait of 3 weeks for a non-urgent appointment with a doctor is not now unusual.

Attached documents:

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Comment: MM2 - LPMM18/1791  Respondent: Dr R S Mackinnon 20701633  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to notify following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.
2. B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited2. There is too much reliance on A3 improvements and these are beyond the council’s control3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

Attached documents:

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Comment: MM2 - LPMM18/1793  Respondent: Dr R S Mackinnon 20701633  Agent:

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share
MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss. MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination. MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation. MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined. MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

**Comment:** MM23 - LPMM18/1796  
**Respondent:** Dr R S Mackinnon 20701633  
**Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

**Comment:** MM23 - LPMM18/1805  
**Respondent:** Dr R S Mackinnon 20701633  
**Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority. In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:
C. I would like the Inspector to RE-EXAMINE the Local Plan because:
1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high. In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

Attached documents:

Comment: MM3 - LPMM18/1794  Respondent: Dr R S Mackinnon 20701633  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM3 - LPMM18/1804  Respondent: Dr R S Mackinnon 20701633  Agent:

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites. MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre. MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM3 - LPMM18/2663  Respondent: Dr R S Mackinnon 20701633  Agent:

The town centre policy, S3, is inadequate and also does not address the infrastructure deficit.

Attached documents:

Comment: MM31 - LPMM18/1797  Respondent: Dr R S Mackinnon 20701633  Agent:
MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment:** MM32 - LPMM18/1798  **Respondent:** Dr R S Mackinnon 20701633  **Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

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**Comment:** MM33 - LPMM18/1799  **Respondent:** Dr R S Mackinnon 20701633  **Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

**Attached documents:**

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**Comment:** MM35 - LPMM18/1800  **Respondent:** Dr R S Mackinnon 20701633  **Agent:**

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at **Gosden Hill Farm**.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment:** MM41 - LPMM18/1801  **Respondent:** Dr R S Mackinnon 20701633  **Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.
**Comment: MM44 - LPMM18/1803  Respondent: Dr R S Mackinnon 20701633  Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

**Comment: MM48 - LPMM18/1792  Respondent: Dr R S Mackinnon 20701633  Agent:**

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road. The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247. I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents. What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge. The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A2473. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh4. The development of 1800 houses at Gosden Hill5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A2476. The conversion of the Burnt Common roundabout to an all-ways junction with the A37. The development of a road from the Gosden Hill development to the A247/Burnt Common.
roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are: 1. The junction with the current A3 south-bound slip road (modifications are underway). 2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph. 3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station. 4. The sight lines for the exit of the Onslow Arms car park. 5. The narrowness of the road near Summers. 6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement. 7. The sharp bend near Clandon Regis. 8. The narrowness of the road at the Bull’s Head. 9. The Clandon Junior School and the, in places, narrow footpath for children walking to school. 10. The sharp bend with poor sight lines in either direction at the church. 11. No continuous footpath through the length of the village. 12. The speed of traffic. 13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker. The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

Attached documents:

Comment: MM9 - LPMM18/1795  Respondent: Dr R S Mackinnon 20701633  Agent: 

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/1806  Respondent: Lynne Sherwood 20701761  Agent: 


Please can you see the comments below which cover my concerns on the Main Modifications to the GBC Local Plan:

1) MM2 – the very recent data from the Office of National Statistics on projected household formation show significant change and provide a clear indication that the Guildford housing requirement should be lowered. I suggest that the Inspector must re-open the Examination of the Local Plan in public to examine this new data and take further advice from the experts.

2) MM2 – in view of the many critical comments about the required provision of new homes to meet Woking’s unmet need and since we in Guildford are experiencing exactly the same Green Belt constraints as Woking, it is argued that the figure of 42 new homes per year to meet Woking’s unmet need should be significantly reduced, and, if possible, eliminated completely. This view is reinforced by the further observation that Woking’s unmet need is itself likely/undoubtedly overstated following their latest ONS household formation data reduction.

Attached documents:

Comment: MM23 - LPMM18/1807  Respondent: Lynne Sherwood 20701761  Agent:

3) MM23 – the importance of Master Planning is appreciated and supported. This is especially important for Gosden Hill Farm (Policy A25) to ensure that no development takes place until agreement is reached between the developer and GBC on the key infrastructure requirements. However, this Policy makes no specific reference to infrastructure nor to the means by which the Master Plan will be approved. The position of the Master Plan in the planning process is left in the air. It is suggested that this deficiency should be rectified and clearly documented.

Attached documents:

Comment: MM35 - LPMM18/1808  Respondent: Lynne Sherwood 20701761  Agent:

4) MM35 – Transport Strategy (1) for Gosden Hill Farm covers a two-way junction with the A3 whilst Transport Strategy (2) covers the possibility of an all movement junction of the A3, A3100, the B2215 and the A247. However, I continue to hold the view that there should be a four-way junction on the A3 itself at Gosden Hill Farm to avoid the unacceptable traffic congestion that this development will cause to both Burpham and Merrow and that Transport Strategy(1) should be amended accordingly.

5) MM35 – in view of the impact that the development of Gosden Hill Farm will have on the residents of Merrow we are pleased to note that consideration should be given at the Planning Application stage to safeguard land for a possible connector road to the B2215 London Road /A247 Clandon Road. I trust that this provision will be retained in the Local Plan as it goes forward.

Attached documents:

Comment: MM27 - LPMM18/2385  Respondent: Mrs Audrey Carpenter 20702561  Agent:

MM27 MM41 MM42 MM48 TRANSPORT STRATEGY
Has a proper assessment of the traffic impact on Send Barns Lane, Send Road been made as thousands of new cars head to Woking every day. Again causing increased noise, air pollution and delays.

I hope the above points will be seriously taken into consideration.

Attached documents:

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**Comment:** MM41 - LPMM18/2382  **Respondent:** Mrs Audrey Carpenter 20702561  **Agent:**

**RE: GUILDFORD LOCAL PLAN PUBLIC EXAMINATION**

**MM41 LAND AT GARLICKS ARCH, POL A43**

We are writing to object to the above proposed extensive development taking place in Send Village.

There were over 7000 objections to the previous 400 homes due to be built. Why have these been ignored?

Site is unsuitable due to flooding & contamination.

Our schools and medical facilities are already overstretched. Has anybody taken into consideration the effect of road congestion?

The main road through Send is already struggling to cope with the traffic flow at peak times.

Attached documents:

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**Comment:** MM41 - LPMM18/2386  **Respondent:** Mrs Audrey Carpenter 20702561  **Agent:**

**MM27 MM41 MM42 MM48 TRANSPORT STRATEGY**

Has a proper assessment of the traffic impact on Send Barns Lane, Send Road been made as thousands of new cars head to Woking every day. Again causing increased noise, air pollution and delays.

I hope the above points will be seriously taken into consideration.

Attached documents:

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**Comment:** MM42 - LPMM18/2383  **Respondent:** Mrs Audrey Carpenter 20702561  **Agent:**

**MM42 Burnt Common, Policy A58**

Why do we need an industrial facility in a residential area when it could be sited on Slyfield Industrial Estate. This is on top of a 25% increase at Send Business when the Employment Land Needs Assessment showed a reduction in demand for industrial land. Again our roads will be gridlocked.
<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/2387</th>
<th>Respondent: Mrs Audrey Carpenter 20702561</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>MM27 MM41 MM42 MM48 TRANSPORT STRATEGY</strong></td>
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<tbody>
<tr>
<td><strong>MM44 LAND AT ALDERTON'S FARM POLICY A63</strong></td>
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<tr>
<td>This is a Green Belt site, so as far as I am aware this contradicts Policy MM9.</td>
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<tr>
<td>It had previously been deleted from an earlier draft due to the number of rejections.</td>
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<tr>
<td>Again there will be additional traffic on the roads. In total it will add 770* houses to the 1700 currently in Send. This is far too much for our infrastructure. *Garlicks Arch (55) Clockbarn (60) Winds Ridge (40)</td>
<td></td>
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**Attached documents:**

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<th>Comment: MM41 - LPMM18/1874</th>
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</table>

**Guildford Local Plan: Strategy and Sites - Main Modifications 2018**

I object to the Main Modifications 2018 to the Guildford Local Plan as follows:-

**MM41 - Land at Garlicks Arch, Send Marsh, Policy A43**

This is Green Belt Land containing ancient woodland.

The increase in the number of houses proposed, from 400 to 550, will join Send and Ripley and constitutes overdevelopment.

The resulting increase in the road traffic will cause further congestion and pollution in adjacent roads, adversely affecting residents and the local school. The A3 and M25 are frequently blocked now, this additional traffic will bring the whole area to a standstill more frequently. School and medical services are already over-subscribed, the waiting time for an appointment at the surgery in Send Barns Lane is already far too long.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM42 - LPMM18/1875</th>
<th>Respondent: J A Aldridge 20703521</th>
<th>Agent:</th>
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**MM27, MM41, MM42 and MM48 Transport Strategy**

The proposed changes in the A3 and Clandon slip roads do not adequately address the impact of thousands more cars travelling along the Portsmouth Road, Send Barns Lane and Send Road past a school and through residential areas, with resulting noise, delays and gridlock and more severe pollution. The infrequent bus services in the area will do nothing to reduce the number of car use.

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**MM42 Land at Burnt Common, London Road, Send, Policy A58**

This is the largest new industrial proposal in any village in the borough and the additional traffic created will further gridlock the narrow surrounding roads and increase the already dangerous pollution levels.
The employment Land Needs Assessment shows a reduction in demand for industrial land and as Slyfield has unused capacity there is no justification for taking Green Belt land.

Attached documents:

Comment: MM42 - LPMM18/1882  Respondent: J A Aldridge 20703521  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy

The proposed changes in the A3 and Clandon slip roads do not adequately address the impact of thousands more cars travelling along the Portsmouth Road, Send Barns Lane and Send Road past a school and through residential areas, with resulting noise, delays and gridlock and more severe pollution. The infrequent bus services in the area will do nothing to reduce the number of car use.

Attached documents:

Comment: MM44 - LPMM18/1877  Respondent: J A Aldridge 20703521  Agent:

Land at Alderton's Farm, Send Marsh Road, Policy A63

This land was only re-inserted in July after being deleted from an earlier draft.

It is Green Belt land with no special circumstances and contradicts Policy MM9.

It will detract from the heritage buildings at Send Marsh Green.

The additional traffic will cause even more pressure on Send Crossroads and the A247, and on local facilities.

As noted in the Strategic Flood Risk Assessment, Appendix D, Volume 3, there is a risk of flooding in this area of Send Marsh.

This site slopes down to Send Marsh Road and, following periods of heavy rain, water runs down the site to lie at the boundary of the road and causes flooding in the land to the north of Send Marsh Road. The gardens of the houses opposite and downhill from this site also flood during periods of heavy rain. Building houses and roads on the land to the east of Alderton's Farm will cause a more rapid run-off of water towards Send Marsh Road and, consequently, heavier and more rapid, serious flooding of all land and properties in the vicinity.

Send Marsh, by nature of its name, was and is, a marsh and liable to flooding.

Attached documents:

Comment: MM48 - LPMM18/1883  Respondent: J A Aldridge 20703521  Agent:

MM27, MM41, MM42 and MM48 Transport Strategy
The proposed changes in the A3 and Clandon slip roads do not adequately address the impact of thousands more cars travelling along the Portsmouth Road, Send Barns Lane and Send Road past a school and through residential areas, with resulting noise, delays and gridlock and more severe pollution. The infrequent bus services in the area will do nothing to reduce the number of car use.

In general these proposals place a heavy load on Send and, in the light of recent reports that the Guildford area does not require such a high level of development as originally thought, are unreasonable and unjustified.

Attached documents:

Comment: MM9 - LPMM18/1878  Respondent: J A Aldridge 20703521  Agent:

MM9 Green Belt Policy

These modifications do not appear to uphold protection of the Green Belt and render the village of Send liable to further infilling and development.

Attached documents:

Comment: MM41 - LPMM18/6063  Respondent: Houston Morris Architects (Conrad James) 20703873  Agent:

1.0 BACKGROUND

Guildford Borough Council are currently consulting on “The Proposed Submission Local Plan: strategy and sites – Main modifications”. The plan sets out the vision for Guildford borough and the Council’s approach to development up to 2034. This includes modifications to the Green Belt, one of which is to remove a large part of the village of Ripley from the Green Belt, below. (See Appendix I)

We have identified an opportunity to provide additional housing for Ripley, however this would involve extending the area proposed to be removed from the Green Belt into the proposed site.

We would like the consultation to consider enlarging the area to be removed from the Green Belt as shown in this document.

2.0 RIPLEY

Ripley is a small village in Surrey, England, with a population of a little over 2,000 and two schools. The village has existed since Norman times. It is located close to the A3.

3.0 SITE LOCATION

Our site is located just to the northeast of Ripley, between Portsmouth Road and the A3. Part of the site is within the Ripley Conservation Area (red dashed line in the plan below) To the North of the site are the Ripley Gates and Ripley Lodge, and a garage. A stream runs through the site.

This site is part of Ockham Park.

Ockham Park is an estate, containing a historic house and grounds, fields and woodland. In 1976 the A3 was constructed, which left a small part of Ockham Park cut off from the rest of the estate. This part contains two fields and some woodland. Being disconnected from the rest of the Ockham estate by the A3 resulted in forming an undesirable,
unproductive strip of land, difficult to access and hence difficult to manage and maintain. Although part of this land is
designated as Ancient Woodland, the reality is very poor quality low grade shrubland. Most of the proposed site is
covered in thick brambles. Any proposed scheme would take into account any healthy old trees.

4.0 PROPOSAL

Ripley is essentially a linear village which has developed principally along Ripley High Street. Our proposal is for a
development of high quality sustainable housing to continue the linear development of the village.

Please note the proposals are at an indicative stage only, to give an idea of the kind of scheme, the density and the number
of houses which may be possible to build in principle.

for figures and appendix see attachment

Attached documents: Houston Morris Rep 3.pdf (148 KB)
Houston Morris Rep 6.pdf (297 KB)
Houston Morris Rep 2.pdf (147 KB)
Houston Morris Rep 4.pdf (142 KB)
Houston Morris Rep Redacted.pdf (1.4 MB)
Houston Morris Rep 5.pdf (163 KB)

Comment: MM45 - LPMM18/2103 Respondent: Mr Ray Chong 20704033 Agent:

This proposal of building 105 homes in an area of AONB is without real and tangible justifications as it does not respect
the environment or the wishes of its residents.

The proposal comes with little or no understanding of the impact on the environment, infrastructure requirements,
disruption to the area and community plus there are no real sustainability understanding or design and no real value or
contribution to the residents or the area.

Furthermore, there is lacking any risk assessment on the impact on the infrastructure needs of such a major development
on road and services like sewage & water requirements.

We utterly opposed such a proposal.

Attached documents:

Comment: MM2 - LPMM18/6005 Respondent: Mrs Jennifer Grove 20704385 Agent:

The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town
centre, have not been fully exploited. We should not be allowing Green Belt development when there is other land to be
built on. It should only be used as a last resort, but ideally never.

... 

Housing numbers should reflect the latest ONS figures and projections. There should be a proper re-examination. The
recent publication of new figures alters things enormously. Why do we have to take up Woking’s deficit? Why do we
have these thousands of houses being built if there is no projected need?
The grounds for green belt development are inadequate. They do not represent ‘exceptional circumstances’ as brownfield sites have not been fully explored and used.

Attached documents:

Comment: MM3 - LPMM18/6008  Respondent: Mrs Jennifer Grove 20704385  Agent:

The town centre policy, S3, is a load of words which cover over the complete inadequacy of recent Councils to do anything to rectify the traffic congestion, enhance the river, sort out the bus station and the whole North Street development, etc. Bearing in mind that talks were taking place in the late 1990s about all this, what hope do we have that anything beneficial is going to come from all these words. The town centre needs a major restructuring basically and should be considered as an entity upon which local people can make their contributions. Piecemeal development will not achieve anything. Things have got so bad that there does need to be a proper town centre plan.

Attached documents:

Comment: MM41 - LPMM18/6007  Respondent: Mrs Jennifer Grove 20704385  Agent:

There is too much reliance on A3 improvements and they are beyond the council’s control. The Gosden Farm site should not even be considered without a proper A3 northbound access. Putting all the traffic through Burpham to access the A3 northbound is absolutely ludicrous. Look at the congestion now.

Attached documents:

Comment: MM39 - LPMM18/4534  Respondent: Mr Toby Welburn 20704481  Agent:

I would like to register my opposition to MM39. The conversion of the land in question near Aaron's Hill from green field to housing will cause great harm to the local ecology including a number of protected species, and great harm to the residents of Godalming who already suffer from high levels of traffic congestion and resulting pollution in excess of safe limits.

I think it is in fact green belt land, but you refer to it as 'Godalming Urban Area' - is this an error?

Attached documents:

Comment: MM27 - LPMM18/1929  Respondent: Nigel Blake 20704577  Agent:

Traffic in the A3 is one thing, but all the small roads through Send and Ripley cannot cope with the extra traffic that would be generated by the huge number of additional houses in Send that this plan would allow. Traffic gridlock and potential increase in road accident injuries seems to have been ignored in the rush to build new houses at any price. This is not acceptable.
You have increased the number of houses from 400 to 550 (an over 37% increase) which suggests that the density of the development will be very high, therefore not a desirable place to live and the extra strain on local roads, infrastructure such as schools and medical services will be excessive. It is very difficult to get an appointment with a GP at the Villages medical center now. I am concerned that if these services are not expanded in line with the size of proposed developments, chaos will ensue. Rush hour traffic getting onto the A3 south bound and north bound through the middle of Ripley or the very dangerous junction at the bottom of potters lane will grid lock the local roads.

The 120 homes here combined with the others proposed in the plan will put too much extra strain on local roads, infrastructure such as schools and medical services will be excessive. I live on the main A247 near the New Inn, and in rush hour the traffic is often at a standstill already in teh direction of Old Woking. Our roads cannot support the extra traffic.

There does not seem to have been any proper assessment of the impact on Send Road and Send Barns Lane of the large amount of additional traffic that will be generated by the aggregate of all the developments proposed in the plan. Traffic gridlock and potential increase in road accident injuries seems to have been ignored in the rush to build new houses at any price. This is not acceptable. Send road heading to Woking is frequently at a standstill in rush hour near the New Inn pub. It will be a total car park if the new development proceed. Send cannot absorb this amount to new development.

I object to the 14800spm of industrial and storage space at Burnt Common (MM42). The infrastructure of our village will not cope with the increase in traffic and large loads down the narrow roads. The increase in traffic and activities on the site will also cause increases in air pollution and noise pollution, impacting on the health of locals. The Green Belt Policy (MM9) is also contradicted as there are no special circumstances to lose the green belt, with Slyfield having free space there is no need for new industrial estates.
Comment: MM2 - LPMM18/1906  Respondent: Mr Peter A Hackman 20704961  Agent: 

I have the following points to make concerning the Local Plan

(1) MM2

In my opinion, that as the housing figures are out of date, the Examination should be re-opened. They provide an unsound basis for the plan and do not justify the loss of so much Green Belt

(2) MM2

Why should Guildford sacrifice Green Belt to provide homes for Woking when Guildford is so geographically constrained?

(3) MM2

There is a strong argument for removing a strategic site and greater scope for town centre provision. Table S2b is out of date and needs to be re-examined

(4) MM2

Neil MacDonald has shown that approximately 360 homes per annum would support the ambitious rate of growth proposed by the inspector. Inappropriate assumptions have been made to arrive at the inflated figure of 630 homes.

Attached documents:

Comment: MM41 - LPMM18/4926  Respondent: Miss Karen Murray 20704993  Agent: 

Objection to MM41 Land at Garlicks Arch, Send Marsh, Policy A43

Objector: Karen Murray, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

As a resident of Send Marsh, I object to the proposed housing development at Garlicks Arch for the following reasons:

- The enormous development, which has increased in size since the last consultation, is too big for the village. There are too many houses planned and the number is not proportionate to the nature and scale of the site (as per MM10/Policy P3: Countryside).

- The wishes of the local residents in the area is not being heard or considered, why else would the number of houses planned for the site continue to increase on each consultation? Why have the previous objections been ignored?

- Garlicks Arch is considered Green Belt and contains ancient woodland - why are you building on it. As part of the other elements in the local plan, protection of Green belt is important and this should be considered 'inappropriate development' (as per MM9/Policy P2: Green Belt)

- A development of this size, at this location should also be considered 'over development'. It will change the settlement boundaries of Send by joining up with Ripley. The settlement boundaries must be protected and keep both Ripley and Send as individual villages.
- There are insufficient plans for infrastructure improvement or considerations in relation to this development apart from broadband/connectivity. The roads through Send and Ripley cannot cope with the increased traffic that this development and the numerous other developments that are proposed for the area will bring. The roads cannot cope with the peak traffic as it is.

- The school and medical facilities in Send (and Ripley because the development is so large), will be pushed to breaking point. The closure of Ripley First School has already put pressure on other primary/first/infant schools, along with an increased traffic impact as residents can no longer walk their children to school. The secondary school issue is well established in the area already with insufficient places for children of the area. Where will the children go to school?

Attached documents:

Comment: MM42 - LPMM18/1919  Respondent: Miss Karen Murray 20704993  Agent:

Objection to MM42 Land around Burnt Common Warehouse, London Road, Send

Objector: [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

As a resident of Send Marsh, I object to the size of the proposed warehouse development at Burnt Common for the following reasons:

- The doubling of the size of this development is what I am objecting to. There is little evidence of the need to double the size of it given the other local business areas of the village are also increasing in size and are not fully utilised at the current time. Noted that this development is intended to be of the 'industrial' kind, however, there is also the large Slyfield development that is proposed. This could be considered over development.

- I also raise concerns about the type of traffic and vehicles that would be using the roads in the area. The small village roads are not suitable for increased numbers of heavy goods vehicles and trucks that would be linked to the industrial site proposal. The road system around Burnt Common are particularly difficult. Slow heavy vehicles meeting the fast traffic coming off the A3 would be hazardous. This needs to be considered.

Attached documents:

Comment: MM44 - LPMM18/4927  Respondent: Miss Karen Murray 20704993  Agent:

Objection to MM44 Land at Aldertons Farm, Send Marsh Road Policy A63

Objector: [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018]

As a resident of Send Marsh, I object to the proposed housing development at Aldertons Farm for the following reasons:

- This development has already been heartily objected to by local residents and had been taken off of the previous proposals. Those objections should continue to be listened to.

- With the Garlicks Arch development and the Burnt Common development, there is far too much for one small part of the village. This should be considered over development or inappropriate development. The map you have included in
this section shows that perfectly. The proposed housing developments of Aldertons Farm and Garlicks Arch would increase the size of the Send Marsh area by approximately 40-50% -  This area is considered Green Belt. As part of the other elements in the local plan, protection of Green belt is important and this should be considered 'inappropriate development' (as per MM9/Policy P2: Green Belt) -  There are insufficient plans for infrastructure improvement or considerations in relation to this development apart from broadband/connectivity. The roads through Send and Ripley cannot cope with the increased traffic that this development and the numerous other developments that are proposed for the area will bring. The roads cannot cope with the peak traffic as it is. -  The school and medical facilities in Send (and Ripley because the development is so large), will be pushed to breaking point. The closure of Ripley First School has already put pressure on other primary/first/infant schools, along with an increased traffic impact as residents can no longer walk their children to school. The secondary school issue is well established in the area already with insufficient places for children of the area. Where will the children go to school? **Attached documents:**

**Comment:** MM41 - LPMM18/1953  **Respondent:** Mr Peter Gilby 20705089  **Agent:**

Objection to MM41

This is development on Green Belt. It will greatly increase traffic on already congested roads through Send. The doctors surgery is already struggling to cope with existing numbers of patients, and both the surgery the school will become overcrowded if the proposed number of new homes is built.

**Attached documents:**

**Comment:** MM44 - LPMM18/1954  **Respondent:** Mr Peter Gilby 20705089  **Agent:**

This is development on Green Belt. If the proposed number of new homes is built. It will greatly increase traffic on already congested roads through Send.

**Attached documents:**

**Comment:** MM27 - LPMM18/1955  **Respondent:** kenneth harrington 20705153  **Agent:**

I am concerned that the proposed changes to the A3 junction Clandon slip roads will result in heavy traffic and congestion in the area making commuting difficult. The junctions at Send Marsh lane and the Portsmouth road are already difficult and dangerous to navigate in peak times and I am not sure what 'additional measures' could mitigate these. The A3 north bound to the M25 and south bound through Guildford regularly grind to a queue during peak times and I am sure this change will draw in more traffic.

**Attached documents:**
Comment: MM41 - LPMM18/1960  
**Respondent:** kenneth harrington 20705153  
**Agent:**

The 550 proposed houses look like an excessive amount of development to place on green belt land and the effects on local roads will cause overloading and gridlock even with the proposed alternative route to the A3. This will cause strain on local schools, doctors and infrastructure not to mention the increased pollution from additional cars. Located so close to the A3 will mean these houses will be exposed to high levels of traffic noise & pollution from the A3.

Attached documents:

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Comment: MM42 - LPMM18/1959  
**Respondent:** kenneth harrington 20705153  
**Agent:**

Why is this green belt area being targeted for industrial development? there must be enough brown field sites available like Slyfield with unused capacity.

Attached documents:

---

Comment: MM44 - LPMM18/1958  
**Respondent:** kenneth harrington 20705153  
**Agent:**

This development will increase the congestion at the junction of send marsh road and Portsmouth road at peak times making it more difficult and dangerous to navigate the junction. It is a green belt site with no special circumstances and along with other proposed sites in the area will put unacceptable pressure on local infrastructure.

Attached documents:

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Comment: MM9 - LPMM18/1957  
**Respondent:** kenneth harrington 20705153  
**Agent:**

The proposal to infill houses within what is considered the village undermines the green belt protection.

Attached documents:

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Comment: MM2 - LPMM18/1989  
**Respondent:** Mr Alistair Smith 20705793  
**Agent:**

The plan although promulgating a policy of Brownfield first in practice supports building on the Greenbelt with little use of Brownfield sites. The council appears from various documents e.g 2017 Town Centre Regeneration Strategy, to have identified many Brownfield sites in the town centre and elsewhere but for reason that are unclear have not included these in the plan. The result seems to be the use of Greenbelt land when it is not really required.
Note I am not suggesting that Greenbelt land is sacrosanct, but its use needs to be properly planned. For example developing Gosden Farm looks an effective development as it can be planned with good transport infrastructure and as a urban extension of Guildford can be linked into the wider facilities within the town

Attached documents:

**Comment: MM3 - LPMM18/2014**  **Respondent: Mr Alistair Smith 20705793**  **Agent:**

Policy S3 is welcomed but it could be so much more. S3 is obviously closely linked with other policies which may change to support S3. S3 needs major changes to include:

Requirement to create a Strategic Plan for the whole town centre, can't the Town Centre be designated a strategic site?

Add in policies to support proper infrastructure investment in the town centre to mitigate flood issues and most importantly revise traffic flows to improve resilience and remove the traffic corridor between the Wey and High Street.

Add or link to policies to preserve the town in particular Mass and Scale Guidelines to avoid planning disasters such as the Solum development at the station.

Add policies that create a proper spatial strategy for the town, e.g. High quality Offices at the Station are easily accessible and may be a better option that flats. (Guildford should avoid just being a dormitory town for London), revise North Street to limit Retail -- with House of Fraser and Debenhams both challenged at present Guildford may have a over provision of retail space. A true spatial strategy would also allow proactive planning in the town - if the Debenhams site became vacant it is a opportunity to maybe ensure the vibrancy of the High St /North Street retail environment and repurpose a site by the river.

Attached documents:

**Comment: MM2 - LPMM18/3754**  **Respondent: C D Kimpton 20706241**  **Agent:**

Re:- Guildford Local Plan – Strategy & Sites – Main Modifications 2018 Sept 2018

We understand that a main modification may only be made if the plan as submitted is unsound. Modifications should only be required to make it sound.

**MM2 Spatial development strategy and housing numbers**

The housing requirement should be calculated from the starting point of the latest, September 2018, ONS Projections, rather than the projections released earlier in 2018. These indicate a projected population increase of 301 dwellings per annum. This reduces the case for Green Belt releases. No exceptional circumstances have been demonstrated to support release of any of the Green Belt (or indeed countryside) sites, especially since (per new policy S3) it is clear that the brownfield land within the urban area should be used as a matter of priority.

We cannot see that these numbers demonstrate any form of justification for the release of any new Green Belt or rural sites.

Attached documents:
We strongly approve this amendment, which moves a previously proposed unsound and indefensible boundary - being a basic post & rail fence - and therefore not a valid argument to bring greenbelt land into the village settlement boundary.

We can see no merit including this high value prime agricultural land into the village boundary. Possible development will be vigorously opposed, costly and be of little value to an affordable housing vision.

The new proposed modification now runs in a straight line along the back of Silkmore Lane and will protect and preserve the highly valued rural character of West Horsley South as it faces beautiful open countryside toward the National Trust's Hatchland Park.

The tranquillity and beauty of this unspoilt side of the village adjacent to the conservation area with its 42 listed buildings, is highly valued not only by village and local residents, but also by visitors to the area, particularly specified by Olympic and frequent cycling events, should be preserved at all costs.

Attached documents:

We strongly approve this amendment, which moves a previously proposed unsound and indefensible boundary - being a basic post & rail fence - and therefore not a valid argument to bring greenbelt land into the village settlement boundary.

We can see no merit including this high value prime agricultural land into the village boundary. Possible development will be vigorously opposed, costly and be of little value to an affordable housing vision.

The new proposed modification now runs neatly along the back of Silkmore Lane and will protect and preserve the highly valued rural character of West Horsley South as it faces beautiful open countryside towards the National Trust’s Hatchland Park.

The tranquillity and beauty of this unspoilt side of the village adjacent to the conservation area with its 42 listed buildings, is highly valued not only by village and local residents, but also by visitors to the area, particularly specified by Olympic and frequent cycling events, should be preserved at all costs.

Attached documents:

I firmly approve the proposed modification to the Settlement Boundary /Green Belt boundary for West Horsley South (MM51) and am grateful to Guildford Borough Council for their decision to support West Horsley Parish Council and Residents in protecting and preserving Green Belt land on this side of the village from future development.
Image top right Pear Tree Cottage paddocks with post and rail fence in distance overlooking open Green Belt land /public footpath leading down to Ripley Lane & National Trust parkland

The previously proposed Green Belt Boundary (small map bottom right) to include Pear Tree’s land was totally indefensible being a basic post and rail fence overlooking open green belt land and not a valid argument to bring Green Belt land into the village settlement boundary. Development on this land would be highly detrimental.

The new proposed modification to the settlement boundary, which now runs neatly along the back of Silkmore Lane’s property boundaries will protect and preserve the highly valued rural character of West Horsley South’s Green Belt land with its beautiful open countryside and public footpath leading down to the National Trust’s Hatchlands House, the farm, parkland, walks and public footpaths.

The tranquillity and beauty of this unspoilt side of the village with 42 listed buildings abutting the conservation area and The Surrey Hills area of outstanding natural beauty is enjoyed and highly valued by not only village residents and locals but also by the many visitors to the area and should be preserved at all costs.

We have a duty of care towards nature conservation. The revised boundary will ensure protection of Green Belt land, the ancient Oak Trees (protected by TPO’s – however we have been warned that builders would be prepared to cut them down and pay the nominal fine) important agricultural land, the biodiversity, the native bats, deer, woodpeckers and pheasants in the fields beyond leading down to Ripley Lane.

The benefits to us all both physically and mentally of being able to enjoy the open countryside, the space, the tranquillity, the time to observe and experience nature is fundamental to our wellbeing.

Along with Hatchlands House, West Horsley Place is fast becoming a highly regarded visitor attraction and with the proposed development sites in West Horsley, it is really important to safeguard the quintessential rural village character and landscape of West Horsley South for many more to experience and enjoy in the years to come.

Thank you for your work on putting the plan together.
We sincerely trust the proposed modification will be implemented.

I would like to be kept updated.
Silkmore boundary – part post and rail part hedge is ‘defensible’ in that it forms a legal property boundary.

Pear Tree’s paddock post and rail fence is ‘indefensible’ in that it is neither a road, river, railway line, woodland, copse, hedge, ditch etc.

Attached documents:

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**Comment:** MM35 - LPMM18/2081  **Respondent:** Mrs (Mrs Gay Rickman) 20707777  **Agent:**

I am concerned about the encroachment on Green Belt and the enormous proposed development on Gosden Hill Farm area. The number of houses should be reduced in accordance with revised Government requirements. The approach to Guildford along the A 3 will be spoilt and the Green Belt is needed for the wellbeing of both city and those outside. I also feel the traffic is already too congested in the Burpham area.

Attached documents:

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**Comment:** MM2 - LPMM18/2086  **Respondent:** Mr ANDREW STRAWSON 20708033  **Agent:**

MM2. The inspector has stated that the most current Office of National Statistics (ONS) data must be taken into account in the review of the Guildford local plan. ONS has published two reports since the Local plan review – both materially indicating lower household formation estimates than previously used. The most recent ONS publication (20/09/18), covering 2016-based household projections for the next 10 years (2018–2028), shows significant reductions versus the earlier data used during examination (23%). These trends are not unique to Guildford and are a general pattern across many regions, including for example Woking, although Guildford is at the higher end of the spectrum of reductions.

This is in addition to earlier announce revisions to the ONS data, which had already had high impact on the housing need figure included in the local plan. Analysis by both GL Hearn and Neil McDonald (NM) had already agreed a reduced OAN base at around 400 houses per annum. Whilst differences in assessed uplift had resulted in a final OANs of 629 versus 460, this difference was driven entirely by differences in assumptions and judgements extended over the 15 to 20 year plan period. The latest ONS data reinforces the real concern that GBC and GL Hearn are materially overstating OAN against the most recently published objective data from ONS. Based on latest ONS published data, NM has revised the unadjusted 2016 household projections to 325 (versus the 420 prior baseline), which is fully justified at a detailed level. The very high difference between this baseline objectively assessed need and the previously proposed and as yet unchanged OAN from GBC must be justified in some way. If GBC cannot agree a revised OAN figure with the Inspector, reflecting similar reductions based on the latest ONS data points, a further round of focused public examination on the continuing objectivity of the OAN is required.

Attached documents:

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**Comment:** MM2 - LPMM18/2087  **Respondent:** Mr ANDREW STRAWSON 20708033  **Agent:**

MM2. Student uplift of 29 in the OAN continues to be overstated. The latest data from ONS shows a reduction household formation for this age group, not an increase. Student need is already more than fully covered in the unadjusted figures.
Indeed, there is more properly an argument for a reduction rather than an increase in OAN, for student numbers, based on the most recent ONS data for this age group. This uplift must be removed.

Attached documents:

Comment: MM2 - LPMM18/2088  Respondent: Mr ANDREW STRAWSON 20708033  Agent:

MM2. The Woking uplift of 42 is now overstated in the GBC OAN, as the revised Woking housing formation is now so reduced in the latest ONS figures that it has effectively eliminated this requirement. This uplift should now be removed from the GBC figure.

Attached documents:

Comment: MM23 - LPMM18/2094  Respondent: Mr ANDREW STRAWSON 20708033  Agent:

MM23 – the importance of Master Planning is appreciated and supported. This is especially important for the proper integration of Gosden Hill Farm (Policy A25) with the local community that a full Master Plan is in place and agreed with the community, developer and GBC before development commences. This is also the mechanism to ensure that the key infrastructure requirements, which are difficult to properly achieve for this site, are established, understood, clearly set out and documented. However, this Policy makes no specific reference to infrastructure nor to the means by which the Master Plan will be approved. The position of the Master Plan in the planning process is left open. It is proposed that this requirement is clearly stated in Local Plan.

Attached documents:

Comment: MM27 - LPMM18/2105  Respondent: Mr ANDREW STRAWSON 20708033  Agent:

MM27 – 4.6.18a which follows the discussion in the Examination of the Local Plan is a serious concern. I believe that the proposed two-way junction with the A3 in Policy A25 should be a 4-way junction. If the A3 Improvement Schemes do not take place, the traffic problems cannot be mitigated by other measures. GBC suggested at the Examination in Public that these could include the Sustainable Movement Corridor and the new railway station in Merrow. I cannot believe that these mitigating measures - even if they are implemented - will deliver the level of necessary mitigation to address the potential serious traffic problems in the area which underlines the critical importance of a 4-way junction with the A3 on the Gosden Hill Farm site.

Attached documents:

Comment: MM3 - LPMM18/2089  Respondent: Mr ANDREW STRAWSON 20708033  Agent:

MM3 – Policy S3. The Inspector raised concerns in the Public Examination over the lack of comprehensive planning for Guildford Town Centre. Whilst some progress has been made, this still represents an early stage of a work in progress.
There needs to be a much tighter framework for further development and more ambitious targeting by GBC to ensure that the needs and the opportunities that exist in the centre of town are actually realised. Otherwise there is a very real and transparent risk that these opportunities will simply lie dormant and fail to progress. It is proposed that:

1. The Town Centre is designated a strategic site
2. A comprehensive Town Centre Master plan is developed
   • GBC should develop its own Town Centre plan for increased brown field development, greater residential volume and options where people wish to live, improved traffic management in the centre of town, enhanced pedestrianised spaces and better riverside usage - either by making use of and adopting the Guildford Vision Group proposals and ideas, or by forming equivalent alternatives.

Attached documents:

Comment: MM35 - LPMM18/2108  Respondent: Mr ANDREW STRAWSON 20708033  Agent:

MM35 – I support the intent of this drafting but the detail is still unclear.

Transport Strategy (1) is clear but Transport Strategy (2) is not and the paragraph suggests that there could be an all movements junction of the A3 with roads north of the A3, west of the site and also to the east of the site. The wording of this condition should be amended to be completely clear on what is being proposed and to avoid confusion and debate at the planning application stage.

This is because advice had been sought from GBC Officers prior to the Examination of the Local Plan and they raised the possibility of the connecting road running north east of the site but south of the A3 until it reached approximately Ewbanks offices (on the north side) where a new road and bridge could cross the A3 and link up with the existing B2215 thence on to the A247.

I believe that there should be a 4-way junction with the A3 at Gosden Hill Farm. The 3-way junction at Garlick’s Arch together with the two- way junction at Gosden Hill Farm does provide a spread-eagled 4-way junction but does not avoid the reality that traffic for London from the site would have to go through Burpham or Merrow to get onto the A3. In order to prevent serious traffic congestion and blockages in Burpham I continue to believe that there needs to be a 4-way junction on the Gosden Hill Farm site. The Transport Strategy (2) should be amended to take in the proposal from Officers, ‘the possibility of the connecting road running north east of the site but south of the A3 until it reached approximately Ewbanks offices (on the north side) where a new road and bridge (or underpass) could cross the A3 and link up with the existing B2215 thence on to the A247’.

The last sentence of Transport Strategy (2) should be a separate condition as a link road to the A247 is a separate issue to a possible all movements junction on the A3.

Attached documents:

Comment: MM2 - LPMM18/5826  Respondent: Dr Richard Bowles 20708353  Agent:

The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited

Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination.
The grounds for green belt development are inadequate because of 1 and 3 and do not represent 'exceptional circumstances'.

Attached documents:

**Comment: MM3 - LPMM18/5831  Respondent: Dr Richard Bowles 20708353  Agent:**

The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

MM3 -Policy S3 Guildford Borough Council must deliver real and co-ordinated results. The Town Centre must be dedicated a strategic site or sites.

MM3 - Policy S3. Guildford must have an effective local plan. Development rules must ensure quality of development sites across the town centre.

MM3 - Policy S3. Guildford Borough Council should adopt Guildford Group's proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

MM3 -Policy D1. Guildford Borough Council as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

Attached documents:

**Comment: MM41 - LPMM18/5828  Respondent: Dr Richard Bowles 20708353  Agent:**

There is too much reliance on A3 improvements and they are beyond the council’s control

Attached documents:

**Comment: MM51 - LPMM18/2104  Respondent: Russell and Greta Sunderland 20708417  Agent:**

GUILDFORD LOCAL PLAN

Amendment : 1 Horsleys -- West Horsley (South) (MM51) (Map page 84)

We have been informed of the expected attempts of builders to overturn the Council's highly welcome decision to cancel a previous proposal to allow the building of a group of houses in the large and important field between Silkmore Lane and Ripley Lane. This area, partly used for fine crops, is of considerable beauty, and even in winter the adjoining old houses in the upper part of Silkmore Lane blend admirably into the eastern background.

It is not surprising that the path which crosses the field is well used by local people who enjoy the splendid views to the north and south, with particular emphasis on two or three quite superb trees (in the very area targeted by builders).
We trust planners will stand firmly by their decision not to allow any building that would enroach on this rather special feature of West Horsley.

Attached documents:

**Comment: MM2 - LPMM18/2119  Respondent: Zach Drennan 20708481  Agent:**

**POLICY S2**

- I object to the way the GBC uses the word 'need' in place of 'demand' when promoting house building requirements in this area.
- I object that the figure for Guildford Borough housing need used by the inspector was 789 per annum. This has been discredited as shown to be a high over-estimate and therefore is an unreliable and irrelevant basis on which to plan housing for the area.
- I object that GBC is using failing to acknowledge and amend their discredited figure of 789 per annum when Barton Willmore - a respected consultancy - has said that the correct figure should be 431.
- I object that GBC is not considering relevant data when proposing housing need and this will impact on and encourage excessive development in Send and destroy our village and its character.
- I object that GBC is proposing to amend its housing need by considering September data from the OFFICE FOR NATIONAL STATISTICS which suggests that appropriate growth for Guildford Borough can be achieved with 460 houses a year.
- I object that GBC fails to consider publicly available data which proposes a much lower number of housing need for our borough and village and - in the face sustained and numerous objections from residents - instead proposes numbers and developments which would only meet the needs of housebuilders and developers.

Attached documents:

**Comment: MM27 - LPMM18/2111  Respondent: Zach Drennan 20708481  Agent:**

**MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY**

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

**Comment: MM41 - LPMM18/2106  Respondent: Zach Drennan 20708481  Agent:**

RE: Objections to Guildford Borough Council (GBC) Local Plan - Consultation due to close on 23.10.2018.

I am writing in response to the latest version of the Local Plan as outline in GBC-LPSS-026. As in earlier versions of the plan, the modifications presented for Send are inappropriate, excessive and will be highly detrimental to our village, our quality of life and our future. These changes will result in irreversible destruction of our village.
The local plan in its current form illustrates the continued failure of GBC to provide a plan that is fit for purpose, supported by competent data made available in the public domain, which provides for the needs of current residents, and secures the best future for them and LISTENS TO LOCAL VOICES.

**MM41 LAND AT GARLICK'S ARCH, SEND MARCH, POLICY A43**

- I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide ‘exceptional circumstances’ to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
- I object that this development is proposed on Green Belt Land and will destroy countryside and ancient woodland.
- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
- I object because local infrastructure will not be able to support the additional demands of new residents.
- I object to GBC’s proposal to consider and address infrastructure requirements when proposing an excessive, unnecessary and disproportionate increase in housing for Send and Send Marsh.
- I object because local schools and medical facilities will not be able to support the massive increase in demands resulting from this plan.
- I object because wildlife will be displaced.
- I object because the site is subject to frequent flooding, which will only worsen with increased buildings and ground coverage.
- I object because the land is contaminated by lead shot and this will compound the problem of increased flooding as outlined in my previous objection and be detrimental to health and well-being.
- I object to GBC ignoring the 7,000 previous objections raised by local residents with regard to developing this area.
- I object to GBC increasing by 37% the number of houses in this development, which is excessive and not supported by need but demand and proposed to promote excessive and unnecessary housing development in this area to the benefit of housing developers but not residents.
- I object to this development as it will 'join up' Send and Ripley and local character will be destroyed by this over development.
- I object that GBC continues to stand by its discredited and unreliable estimate for future housing need and fails to adjust this downwards by considering its erroneous assumption about student population forecasts in Guildford. This would of course impact on housing need across neighbouring areas including Send.

**Comment:** MM41 - LPMM18/2112 **Respondent:** Zach Drennan 20708481 **Agent:**

**MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY**

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

**Attached documents:**

**Comment:** MM42 - LPMM18/2107 **Respondent:** Zach Drennan 20708481 **Agent:**

**MM42 LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58**
• I object to the proposal that an industrial unit to be developed in this area, and the failure to demonstrate need or benefit.
• I object to GBC proposing this development in the face of the Employment Land Needs Assessment showing a reduction in demand for industrial land. It is not desired nor justifiable.
• I object to GBC proposing building this site, without demonstrating special circumstances and contradicting MM9.
• I object to GBC proposing the development of industrial; sites in the Green Belt where there is unused capacity in Slyfield.
• I object that this proposal, coupled with 25% increase at Send Business Centre means there is a much bigger concentration of such land use with no proven demand, and is both disproportionate and unfair when comparing Send with other villages.

Attached documents:

Comment: MM42 - LPMM18/2113  Respondent: Zach Drennan 20708481  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

• I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM44 - LPMM18/2109  Respondent: Zach Drennan 20708481  Agent:

MM44 LAND AT ALDERTON'S FARM, SEND MARSH ROAD, POLICY A63

• I object to the late inclusion of this site, deleted from an earlier draft due to the strength of local objections and that GBC ignore these by only re-inserting this proposal at the public examination in July. This late inclusion does not follow correct process or allow for legitimate consultation.
• I object to this development as it will contradict Government guidance in their proposals to build on Greenbelt land and because GBC fail to provide 'exceptional circumstances' to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
• I object that this development is proposed on Green Belt Land and will destroy countryside.
• I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
• I object because local infrastructure will not be able to support the additional demands of new residents.
• I object because wildlife will be displaced.
• I object because GBC continues to promote excessive and unnecessary housing demand, rather than allowing for open and democratic evaluation of housing need in the area.
• I object because this additional development will result in traffic and increased pressure on already over-utilised and traffic blocked roads in the village.
• I object because the proposal of adding 770 houses to our village (including 550 at Garlicks Arch, 60 at Clockbarn, 40 at Winds Ridge) is disproportionate and places excessive and unachievable demand on local services roads and the infrastructure and character of our village. The addition of 770 new houses to the current population of 1700 properties would be an increase of more than 45%. This cannot be accommodated by the existing infrastructure.
Comment: MM48 - LPMM18/2114  Respondent: Zach Drennan 20708481  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Comment: MM9 - LPMM18/2110  Respondent: Zach Drennan 20708481  Agent:

MM9 GREEN BELT POLICY

- I object to the GBC claim that they are protecting the Green Belt as this is highly subjective and exposing any land on the edge of our village for excessive and over-development.
- I object as the approach proposed will create significant opportunities for interested parties to undermine and erode the protections enshrined in the green belt designation and will certainly lead to the continued expansion of the settlement boundaries.
- I object to the wording of policy paragraph (1) as it is devoid of meaning. The paragraph states that "Inappropriate development will not be permitted unless very special circumstances can be demonstrated". Are we to understand that inappropriate development will be permitted in special circumstances? The paragraph goes on to state that "Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations". This is clearly nonsense masquerading as reason and provides no objective criteria for its application.
- I object to all proposals to build on Green Belt land in the borough and that GBC uses discredited and exaggerated housing 'need' data to support this. Urban brownfield areas could accommodate all the true and required development that is needs and such sites are close to existing transport systems and links. NO such infrastructure exists in our village.

Comment: MM41 - LPMM18/2135  Respondent: Val Houghton 20710529  Agent:

MM41

I object to this new proposal to increase the number of homes on the Garlicks Arch site from 400 to 500 for the same reason that applied to the original application, i.e. this is an attack on Green Belt land, it will have a negative affect on local wildlife, local fauna & destroy an ancient woodland. It will also add to local traffic problems, local school & medical facilities.
**Comment: MM42 - LPMM18/2136  Respondent: Val Houghton 20710529  Agent:**

MM42 The further development of this land with its restricted access will add to the local traffic problems already affecting the narrow A247. The short stretch of road from the Burnt Common roundabout to the bridge over the A3 is already almost continuous & becoming a health hazard.

**Attached documents:**

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**Comment: MM44 - LPMM18/2137  Respondent: Val Houghton 20710529  Agent:**

Development of this area is a direct attack on the Green Belt - it is farming land - a valuable source of food production & once built on can never be restored.

**Attached documents:**

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**Comment: MM2 - LPMM18/2165  Respondent: Godalming Town Council (Andrew Jeffery) 20712257  Agent:**

Re: Response from Godalming Town Council to Guildford Borough Council's Consultation on the Guildford Local Plan: Strategy and Sites - Main Modifications

Godalming Town Council makes the following observations (in bold) regarding the Guildford Local Plan: Strategy and Sites - Main Modifications:

**MM2 - Policy S2: Planning for the borough - our spatial development strategy**

As stated in 4.1.9aa Woking Borough Council has yet to review its current Local Plan and as the latest population and household projections indicate that the level of Woking's unmet need is lower than that assessed in the West Surrey SHMA (2015).

**Guildford Borough Council should remove the requirement for A61 Aaron's Hill - Urban Extension to Godalming from Policy S2: Planning for the borough - our spatial development strategy.**

**Attached documents:**

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**Comment: MM23 - LPMM18/2166  Respondent: Godalming Town Council (Andrew Jeffery) 20712257  Agent:**

**MM23 - Policy D1 - Place Shaping**

**Masterplans for strategic sites**

(15) Developers will be required to produce Masterplans for Slyfield Area Regeneration Project (A24), Gosden Hill Farm (A25), Blackwell Farm (A26) and the former Wisley Airfield (A35) and these will be subject to assessment by a Design Review Panel. The master planning process shall engage with the local community.
If (A61) Aarons Hill - Urban Extension to Godalming remains within Policy D1 then it should be added to the list of those sites required to produce masterplans to be subject to review by a design review panel. Additionally the following should be added: "The Master planning process shall engage with the local community, including those communities within adjoining planning authority areas where development in Guildford Borough is likely to have a significant impact on that community."

Attached documents:

**Comment:** MM39 - LPMM18/2167  **Respondent:** Godalming Town Council (Andrew Jeffery) 20712257  **Agent:**

MM39 - Policy A61: Land at Aaron's Hill, Godalming

The following should be added to the requirements for development:

Development of site A61 should not be permitted until the potential impact on local Air Quality, and Transport Infrastructure has been assessed following the completion of any development on the Waverley Borough part of the site.

Attached documents:

**Comment:** MM42 - LPMM18/2178  **Respondent:** Mary Hebberd 20712353  **Agent:**

I am writing to object to plannings for Send. Burnt Common is industrial and should not be housing.

Traffic is bad enough (mornings especially) through Send Road, Send Barns Lane onto A3.

We have lost 9 shops since I came to Send in 1963

Attached documents:

**Comment:** MM27 - LPMM18/2182  **Respondent:** Barry Konkle 20712385  **Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

I object. To GBC offering fine words, but no real assessment of the traffic impact in Send Barns Lane, Send Road. Vehicles heading to Woking and vehicle from Woking making their way Send and Ripley to gain access to the A3 both North and South bound.

Attached documents:

**Comment:** MM41 - LPMM18/2179  **Respondent:** Barry Konkle 20712385  **Agent:**
RE: OBJECTIONS TO THE LOCAL PLAN.

MM41 Land at Garlicks Arch. Send Marsh. Policy A43

I object to the increased number of homes, from 400 to 550, this is Green Belt land, with flooding being a problem and the volume of the extra traffic which may amount to two cars per household, putting great strain on the local roads. Also the school and the Doctors Surgery are already full at present time.

Attached documents:

Comment: MM41 - LPMM18/2183  Respondent: Barry Konkle 20712385  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

I object. To GBC offering fine words, but no real assessment of the traffic impact in Send Barns Lane, Send Road. Vehicles heading to Woking and vehicle from Woking making their way Send and Ripley to gain access to the A3 both North and South bound.

Attached documents:

Comment: MM42 - LPMM18/2180  Respondent: Barry Konkle 20712385  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58

I object to Industrial storage being increased from 7,000 to a minimum of 14,800 sq m. There is no need to put an industrial site on Green Belt land. While there are more empty sites at Slyfield. Yet again the local roads are not suitable for a large increase of commercial traffic. This also contradicts MM9.

Attached documents:

Comment: MM42 - LPMM18/2184  Respondent: Barry Konkle 20712385  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

I object. To GBC offering fine words, but no real assessment of the traffic impact in Send Barns Lane, Send Road. Vehicles heading to Woking and vehicle from Woking making their way Send and Ripley to gain access to the A3 both North and South bound.

Attached documents:

Comment: MM48 - LPMM18/2185  Respondent: Barry Konkle 20712385  Agent:
MM27 MM41 MM42 and MM48 Transport Strategy

I object. To GBC offering fine words, but no real assessment of the traffic impact in Send Barns Lane, Send Road. Vehicles heading to Woking and vehicle from Woking making their way Send and Ripley to gain access to the A3 both North and South bound.

Attached documents:

**Comment**: MM9 - LPMM18/2181  **Respondent**: Barry Konkle 20712385  **Agent**:

MM9 Green Belt Policy.

I object to the modifications claims made to protect the Green Belt by GBC, as this negates Green Belt protection.

Attached documents:

**Comment**: MM27 - LPMM18/2228  **Respondent**: Alan A. White 20720737  **Agent**:

MM27 MM41 MM42 MM48 Transport Strategy.

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.

The traffic on the North Bound A3 backs up from the M25 junction, "rat running" takes place off the Burnt Common exit and through Ripley village. This has not been referred to in any document.

The Southbound traffic backs up from Stag Hill to the Burpham Junction exit. This has not been referred to in any document.

None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.

Burnt Common roundabout will be gridlocked by the increase in the number of vehicles, of commuters, school run drivers and the manoeuvring of HGV vehicles visiting the proposed new industrial site at Burnt Common, and the new units in Send Business Centre.

Emotionally this is a Transport Strategy for disaster.

Attached documents:

**Comment**: MM41 - LPMM18/2225  **Respondent**: Alan A. White 20720737  **Agent**:

Guildford Local Plan OBJECTION
At a time when the Office of National Statistics has identified a drop in the need for both housing and industrial/warehousing, I am appalled that Guildford B.C. is still pursuing its on-going proposals for the destruction of the Green Belt and Send Village. It has ignored the 7000 objections for the Garlicks Arch proposal and clearly considers itself far better qualified than the residents to dictate the need for Send Villagers.

The campaign to Protect Rural England has stated that during 2017/2018 more than 5000 hectares of Green Belt have been released for development and further land is set for release. Such land is some of the most profitable and desirable for developers due to it being "shovel ready", surrounded by countryside (but not for long) and within commuting distance of towns and cities. It leaves little to the imagination that such development suggested by Guildford B.C will destroy the environment that developers prize so much in their bid to take the money and run. These comments are not emotional outpourings but simple facts.

To be more specific I OBJECT to:–

**MM41 Land at Garlicks Arch A43**

The latest amendment increases further destruction of the Green Belt by the increase of housing from 400 to 550 - 37%

I would ask where are these 1000 or so people going to be imported from?

All previous objections, which numbered some 7000, have been completely ignored. Perhaps this is an indication of what Guildford B.C. thinks of its residents.

The Green Belt ancient woodland is a target for removal by developers and I am fully aware how the bulldozers move in early and start work before complaints can be made to the local authority. **It happened in my road over a May Bank Holiday**, when some dozen mature oaks were felled. The recent Climate Change Summit recommended the increase of tree planting to combat increasing CO2 emissions. So Guildford knows better than the experts?

Send and Ripley villages will become one village created by linear development so loved by the planners in the 1950s

The development will add some 800+ vehicles to the surrounding roads which are already congested with commuter and school run vehicles and were never designed to take today's volume of traffic.

The B2215 Portsmouth Road has proven a "rat run" for vehicles attempting to queue jump the holdup on the northbound A3.

The existing infrastructure of education and medical facilities have not been considered. Ripley School has closed, St Bedes School has been demolished and incorporated into Send C of E School and George Abbot Secondary School no longer takes children from the Send area. The parking movements outside Send C of E school during drop-off and pick-up times are dangerous for both parents and other road users and the recently installed centre refuge funnels vehicles closer to the pavement.

The only doctor's surgery is near capacity judging by appointment waiting times.

**Attached documents:**

**Comment:** MM41 - LPMM18/2229 **Respondent:** Alan A. White 20720737 **Agent:**

**MM27 MM41 MM42 MM48 Transport Strategy.**

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.
The traffic on the North Bound A3 backs up from the M25 junction, "rat running" takes place off the Burnt Common exit and through Ripley village. This has not been referred to in any document.

The Southbound traffic backs up from Stag Hill to the Burpham Junction exit. This has not been referred to in any document.

None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.

Burnt Common roundabout will be gridlocked by the increase in the number of vehicles, of commuters, school run drivers and the manoeuvring of HGV vehicles visiting the proposed new industrial site at Burnt Common, and the new units in Send Business Centre.

Emotionally this is a Transport Strategy for disaster.

Attached documents:

Comment: MM42 - LPMM18/2226  Respondent: Alan A. White 20720737  Agent:

MM42 Land at Burnt Common Policy A58

The majority of this land was, historically, Fogwills plant nursery and has never been industrial.

There is no requirement to create an industrial/warehousing use when Slyfield Estate has spare capacity.

There are no "special circumstances" especially when the Employment Land Needs Assessment shows a reduced requirement for industrial land as does the Office of National Statistics. This therefore contradicts Policy MM9.

The proposed expansion of this site to a minimum of 14,800sq.metres is in addition to the 25% increase at Send Business Centre and, yet again, the Employment Land Needs Assessment shows a reduced requirement.

The North Bound slip road of the A3 already takes "rat running" traffic which conflicts with the North and South bound traffic at the Burnt Common roundabout, most of which is attempting to access the A3 through Ripley village. Heavy Goods Vehicle movements in this immediate area will create nightmare congestion on, not only the A3, A247 Clandon Road and A247 Send Road. The local road network is not designed for such a volume of HGV traffic.

Attached documents:

Comment: MM42 - LPMM18/2230  Respondent: Alan A. White 20720737  Agent:

MM27 MM41 MM42 MM48 Transport Strategy.

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.

The traffic on the North Bound A3 backs up from the M25 junction, "rat running" takes place off the Burnt Common exit and through Ripley village. This has not been referred to in any document.
The Southbound traffic backs up from Stag Hill to the Burpham Junction exit. This has not been referred to in any document.

None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.

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Emotionally this is a Transport Strategy for disaster.

Attached documents:

Comment: MM48 - LPMM18/2231  Respondent: Alan A. White 20720737  Agent:

MM27 MM41 MM42 MM48 Transport Strategy.

Guildford B.C. have produced, what they call a Transport Strategy, without addressing the wider vehicle movement problems. The Leader of Guildford B.C has already acknowledged in public that the area has significant congestion and transport problems and yet still adds his name to policies that are clearly flawed.

The traffic on the North Bound A3 backs up from the M25 junction, "rat running" takes place off the Burnt Common exit and through Ripley village. This has not been referred to in any document.

The Southbound traffic backs up from Stag Hill to the Burpham Junction exit. This has not been referred to in any document.

None of the roads surrounding Send were designed to take large volumes of traffic. They were and still are, in effect, village streets, despite their A road classification.

Burnt Common roundabout will be gridlocked by the increase in the number of vehicles, of commuters, school run drivers and the manoeuvring of HGV vehicles visiting the proposed new industrial site at Burnt Common, and the new units in Send Business Centre.

Emotionally this is a Transport Strategy for disaster.

These OBJECTIONS are based on facts and it would be naive for Guildford B.C. and its associated developers to think that it is truly doing the residents of Send a huge favour.

Attached documents:

Comment: MM9 - LPMM18/2227  Respondent: Alan A. White 20720737  Agent:

MM9 Green Belt Policy.

Guildford B.C suggests that their modification will protect the Green Belt, except in "exceptional circumstances". It is clear, from various statements made by G.B.C. that they have been unable to justify any exceptional circumstances. There are no excuses for the wanton private destruction of our, and NOT GBC's or developers', green and pleasant land.
As a long time resident of Send for over 50 years, I am very saddened to see that once again Send is being overloaded with an increased number of houses. Many on Green Belt despite the thousands of protestations from villagers concerned about this village. I am aware that the figure G.B.C Inspector used was 789 houses per year, but a late consultant said that 460 houses should be the appropriate growth as referred to in POLICY S2 which would make a huge difference locally.

MM41. Land at Garlick's Arch Policy A43

This is ancient woodland and as such Green Belt. Why now the increase of 150 homes? How will our local school and surgery cope which are already at full capacity.

MM42. Land at Burnt Common. Policy A58

Why do we as a village need a large industrial estate! Guildford only 10 mins. away and our local roads are ill equipped to cope with massive delivery lorries.

MM44 Land at Alderton's Farm. Policy A63

This Green Belt land was deleted from the earlier draft because of all the objections but now 120 houses are planned on this site.

It is [unreadable text] clear that G.B.C. does not take into account the feelings of Send residents when they know they are about to be inundated with thousands more cars and people. Our roads are already suffering with [unreadable text] traffic jams and it would be incapable of coping with your suggested plan for our village.

POLICY S2
I object to the way GBC uses the word 'need' in place of 'demand' when promoting house building requirements in this area.

I object that the figure for Guildford Borough housing need used by the Inspector was 789 per annum. This has been discredited as shown to be a high over-estimate and therefore is an unreliable and irrelevant basis on which to plan housing for the area.

I object that GBC is using failing to acknowledge and amend their discredited figure of 789 per annum when Barton Willmore - a respected consultancy - has said that the correct figure should be 431.

I object that GBC is not considering relevant data when proposing housing need and this will impact on and encourage excessive development in Send and destroy our village and its character.

I object that GBC fails to take into account publicly available data which proposes a much lower number of housing need for our borough and village and - in the face of sustained and numerous objections from residents - instead proposes numbers and developments which would only meet the needs of housebuilders and developers.

Attached documents:

Comment: MM27 - LPMM18/2275  Respondent: Ruby Pyne 20722721  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM41 - LPMM18/2268  Respondent: Ruby Pyne 20722721  Agent:

RE: Objections to Guildford Borough Council (GBC) Local Plan - Consultation due to close on 23.10.2018

I am writing in response to the latest version of the Local Plan as outline in GBC-LPSS-026. As in earlier versions of the plan, the modifications presented for Send are inappropriate, excessive and will be highly detrimental to our village, our quality of life and our future. These changes will result in irreversible destruction of our village.

The local plan in its current form illustrates the continued failure of GBC to provide a plan that is fit for purpose, supported by competent data made available in the public domain, which provides for the needs of current residents, and secures the best future for them and LISTENS TO LOCAL VOICES.

MM41 LAND AT GARLICK'S ARCH, SEND MARCH, POLICY A43

- I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide 'exceptional circumstances' to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.

- I object that this development is proposed on Green Belt Land and will destroy countryside and ancient woodland.

- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.

- I object because local infrastructure will not be able to support the additional demands of new residents.

- I object to GBC’S proposal to consider and adequately address infrastructure requirements when proposing an excessive, unnecessary and disproportionate increase in housing for Send and Send Marsh.
- I object because local schools and medical facilities will not be able to support the massive increase in demands resulting from this plan.
- I object because wildlife will be displaced.
- I object because the site is subject to frequent flooding, which will only worsen with increased buildings and ground coverage.
- I object because the land is contaminated by lead shot and this will compound the problem of increased flooding as outlined in my previous objection and be detrimental to health and well-being.
- I object to GBC ignoring the 7,000 previous objections raised by local residents with regard to developing this area.
- I object to GBC increasing by 37% the number of houses in this development, which is excessive and not supported by need but demand and proposed to promote excessive and unnecessary housing development in this area to the benefit of housing developers but not residents.
- I object to this development as it will 'join up' Send and Ripley and local character will be destroyed by this over development.
- I object that GBC continues to stand by its discredited and unreliable estimate for future housing need and fails to adjust this downwards by considering its erroneous assumption about student population forecasts in Guildford. This would of course impact on housing need across neighbouring areas including Send.

Attached documents:

Comment: MM41 - LPMM18/2277  Respondent: Ruby Pyne 20722721  Agent:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

Comment: MM42 - LPMM18/2269  Respondent: Ruby Pyne 20722721  Agent:

MM42 LAND AT BURNT COMMON, LONDON ROAD, SEND, POLICY A58

- I object to the proposal that an industrial unit be developed in this area, and the failure to demonstrate need or benefit.
- I object to GBC proposing this development in the face of the Employment Land Needs Assessment showing a reduction in demand for industrial land. It is not desired nor justifiable.
- I object to GBC proposing building this site, without demonstrating special circumstances and contradicting MM9.
- I object to GBC proposing the development of industrial sites in the Green Belt where there is unused capacity at Slyfield.
- I object that this proposal, coupled with 25% increased at Send Business Centre means there is a much bigger concentration of such land use with no proven demand, and is both disproportionate and unfair when comparing Send with other villages.

Attached documents:
MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:

MM44 LAND AT ALDERTON'S FARM, SEND MARSH ROAD, POLICY A63

- I object to the late inclusion of this site, deleted from an earlier draft due to the strength of local objections and that GBC ignore these by only re-inserting this proposal at the public examination in July. This late inclusion does not follow correct process or allow for legitimate consultation.
- I object to this development as it will contradict Government guidance in their proposals to build on Greenbelt land and because GBC fail to provide 'exceptional circumstances' to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this, as such circumstances do not exist.
- I object that this development is proposed on Green Belt land and will destroy countryside.
- I object because of the detrimental impact of such development on the health of local residents and wildlife because of increased traffic.
- I object because local infrastructure will not be able to support the additional demands of new residents.
- I object because wildlife will be displaced.
- I object because GBC continues to promote excessive and unnecessary housing demand, rather than allowing for open and democratic evaluation of housing need in the area.
- I object because this additional development will result in traffic and increased pressure on already over-utilised and traffic blocked roads in the village.
- I object because the proposal of adding 770 houses to our village (including 550 at Garlicks Arch, 60 at Clockbarn, 40 at Winds Ridge) is disproportionate and places excessive and unachieveable demand on local services roads and the infrastructure and character of our village. The addition of 770 new houses to the current population of 1700 properties would be an increase of more than 45%. This cannot be accommodated by the existing infrastructure.

Attached documents:

MM27, MM41, MM42 AND MM48, TRANSPORT STRATEGY

- I object that GBC has failed to assess the implications of excessive and unwarranted development on traffic and infrastructure of traffic driving through Send each day.

Attached documents:
MM9 GREEN BELT POLICY

- I object to the GBC claim that they are protecting the Green Belt as this is highly subjective and exposing any land on the edge of our village for excessive and over-development.
- I object as the approach proposed will create significant opportunities for interested parties to undermine and erode the protections enshrined in the green belt designation and will certainly lead to the continued expansion of the settlement boundaries.
- I object to the wording of policy paragraph (1) as it is devoid of meaning. The paragraph states that "Inappropriate development will not be permitted unless very special circumstances can be demonstrated". Are we to understand that inappropriate development will be permitted in special circumstances? The paragraph goes on to state that "Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations". This is clearly nonsense masquerading as reason and provides no objective criteria for its application.
- I object to all proposals to build on Green Belt land in the borough and that GBC uses discredited and exaggerated housing 'need' data to support this. Urban brownfield areas could accommodate all the true and required development that is needs and such sites are close to existing transport systems and links. NO such infrastructure exists in our village.

Attached documents:

Comment: MM9 - LPMM18/2294  Respondent: Sean E.N Henry 20723905  Agent:

RE: Guildford Borough Submission Local Plan: Strategy and Sites - Main Modifications

I wish to make representations in relation to the following proposed main modifications:

MM9 Policy P2: Green Belt

MM9 Policy Paragraphs 1-4:

- I support the principle of Policy P2: Green Belt which allows for some limited infilling outside identified settlement boundaries.
- The policy promotes sustainable patterns of development in accordance with paragraph 138 of the National Planning Policy Framework (NPPF)
- The policy accords with paragraph 145 of the NPPF in that 'limited infilling in villages' is an exception in terms of 'inappropriate' development.
- Paragraph 145 does not specify whether the 'villages' referred to under criteria (e) should have a settlement boundary or not, therefore sites that are considered to be suitable for infilling and are part of the village should be acceptable.
- The identified settlement policy boundaries are considered to be tightly drawn as most development opportunities have been taken up and scope for further development is very limited. This is borne out by information contained in the 2017 Land Availability Assessment (LAA), which shows that between 2018 and 2032, 154 homes could possibly be built on sites within 12 of the 28 village settlement boundaries listed in Policy P2. (There are currently no sites available within the remaining 16 villages).
- I support limited infilling both within and outside the settlement boundary for Pirbright which has a good range of local community facilities including a primary school, public house and community hall.
- In order to continue and flourish, these facilities need supporting. Some additional development could help achieve this. However, the 2017 LAA shows that only 9 homes could be built on sites within the settlement policy boundary for Pirbright between 2028 and 2032. No sites within the village boundary are currently included for the period 2017-2028

MM9 Reasoned Justification para 4.3.25
• Sites adjacent to settlement policy boundaries should be considered favourably.
• I believe that some additional land must be included outside and adjacent to settlement boundaries to allow for some further development, especially where it will help maintain existing facilities and help provide for local needs.

Please confirm that these comments will duly be taken into consideration by the Inspector.

Attached documents:

Comment: MM27 - LPMM18/2335  Respondent: Stephen Hewett 20726113  Agent:

REF - MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48

I "object" in the strongest possible terms to the proposed developments on the above mentioned REF’s for many and [unreadable text] reasons that have been waived before many thousands of [unreadable text] in the form of protest letters and emails that now seem to have been ignored.

At least 2 of the above mentioned sites are on Green Belt Land. What is the point of a Green Belt if you chose to ignore it.

The original purpose of the Green Belt was to prevent unrestricted development on and around the main road and rail amenities around London and at the large towns and cities. A very considerable policy of which until now it has been largely successful. This policy has seen to be abandoned by these proposals. Ripley state school is to be closed so where are all these new children supposed to go to school.

Send in particular seems to be singled out for such contained action. Why is this; is it because the Ripley, [unreadable text], East + West-Horsley they have had the courage to stand up to the bully boy tactics of GBC planning. Led by the inspiring leadership of Sue Parker and others in the ‘Green Belt Group’ these people are standing up to the G.B.C planning jugganaughts made up of "TORY + LIB-DEM [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] this unholy alliance of [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] characters seem to have no feelings for local concerns, but are hell-bent on making money and getting revenge on people who have the courage to stand up to them. I ask you to think again and reject these [unreadable text] proposals.

PS Is Send being so certainly [unreadable text] because Sue Porter is a Send Borough Councillor and Green Belt group leader and founder!!

Attached documents:

Comment: MM41 - LPMM18/2331  Respondent: Stephen Hewett 20726113  Agent:

REF - MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48

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Attached documents:

Comment: MM42 - LPMM18/2332  Respondent: Stephen Hewett 20726113  Agent:

REF - MM41, MM42, MM44, MM9, MM27, MM41, MM42 and MM48

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Attached documents:

Comment: MM44 - LPMM18/2333  Respondent: Stephen Hewett 20726113  Agent:
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and emails that now seem to have been ignored.

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PS Is Send being so certainly [unreadable text] because Sue Porter is a Send Borough Councillor and Green Belt group
leader and founder!!

**Attached documents:**

**Comment:** MM48 - LPMM18/2336  **Respondent:** Stephen Hewett 20726113  **Agent:**
PS Is Send being so certainly [unreadable text] because Sue Porter is a Send Borough Councillor and Green Belt group leader and founder!!

Attached documents:

Comment: MM9 - LPMM18/2334  Respondent: Stephen Hewett 20726113  Agent:

REF - MM41, MM42, MM44, MM27, MM41, MM42 and MM48

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Attached documents:

Comment: MM41 - LPMM18/2347  Respondent: Sarah Stalley 20727361  Agent:

Policy A43 Re: MM41

LAND AT GARLICKS ARCH SEND MARSH

I have lived in Send for 47 years, I enjoy living here. Firstly none of us wish to be joined by our pretty village onto Ripley's pretty rural village. It seems to me that planners, councils, and builders are the only ones rubbing their hands with glee at the prospect of wealth ignoring safety and pleasure of local villagers who enjoy the rural surroundings +amenities it has to offer plus local shops post office etc.

1st More properties more industrial vehicles to clog narrow lanes more cars the narrow lanes + roads were not meant for heavy vehicles thus putting strain + danger to all of us who enjoy the narrow lanes to walk down it is part of the enjoyment of rural natural life and villagers in Send not to mention the elderly and disabled who sometimes have to cope
with the ever increasing traffic through our village sometimes their only transport around the village are mobility aids in mobility scooters wheelchairs and also for blind + partially sighted who only rely on sticks or white canes or a guide dogs.

The council should sit up read all those letters and comments constructively, there are brownfield sites available to build on use those instead build a new village with amenities and leave community villages alone.

2nd The previous greenbelt should not on any account be built on, trees on this site are ancient woodland, woodland with trees are necessary to our daily lives, trees absorb Carbon Dioxide hence Send at the moment has a low level. Destroying Green Belt Land should not be carried out. Families and children and people of Send should not be ignored.

3rd Send Community has things we all need and cherish. We have a good school, an excellent medical centre, village hall, churches, play areas several amenities including a tennis court. All are within walking distance for most people.

All this will change and not for the better unnecessary industrial works and homes built will destroy the beauty of our village and rural life as we know it.

Attached documents:

Comment: MM42 - LPMM18/2349  Respondent: Sarah Stalley 20727361  Agent:

BURNT COMMON LONDON ROAD SEND MM42 POLICY A58

There is as far as I can see no real need whatsoever to put further industrial sites in Send.

IT HAS DOUBLED IN SIZE SINCE 2014 increased from 7000 to 14,800sqm the largest industrial allocation site in any village in the borough. The Green belt should not be seized for anything industrial or anything else especially as Slyfield has large unused capacity which could be facilitated. The infrastructure of Sends narrow lanes which makes Send rural life appealing would be clogged up with heavy goods vehicles lorries etc. Causing unnecessary anguish to Send residents + families causing huge traffic problems.

We would all like to keep our village unique + rural.

Attached documents:

Comment: MM44 - LPMM18/2348  Respondent: Sarah Stalley 20727361  Agent:

MM44 LAND AT ALDERTONS FARM Policy A63

This greenbelt land should not be built on at all the additional traffic will cause undue pressure at Send crossroads again narrow lanes will become problematic, also increasing 1,700 houses in Send, our infrastructure cannot cope now this will make it worse I do not think it has been planned or taken into account furthermore it contradicts Policy MM9.

Attached documents:

Comment: MM41 - LPMM18/2351  Respondent: Jonathan Wilson 20729505  Agent:
I've recently received a letter from Save Send Action Group regarding multiple developmental plans in the Send area which will have a huge impact on the local community as well as environmentally and ethically.

I understand the need for more housing. However, I feel that not enough consideration has been taken with regards to the existing residents. Send is a small village which has drawn and kept its inhabitants due to its size, location and greenbelt land giving its occupants rest bite from city living.

Whilst I agree that some housing is necessary the 550 proposed new homes without any existing infrastructure to support an increased population in the area is a mistake.

A further area for concern is the introduction of two new traveller sites to the community. This in my view is abhorrent. As we have seen in other local areas [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] and inevitably costs the council and the local community time, money and resources all of which could be avoided. Send is a quiet village drawing home owners seeking a certain standard of living and they have paid handsomely for the privilege. You as a council can offer me no guarantees that my current standard of living will not be interrupted by your actions which are not supported by the local community [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

I hope you take on board the view of our and not just the contractors.

Attached documents:

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**Comment:** MM27 - LPMM18/2357  **Respondent:** L Smith 20729793  **Agent:**

**I object to:** MM27, MM41, MM42 and MM48 Transport Strategy

- The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
- There has been no effective traffic impact assessment

Attached documents:

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**Comment:** MM41 - LPMM18/2353  **Respondent:** L Smith 20729793  **Agent:**

**I object to the Main Modifications**

**I object to:** MM41 Land at Garlicks Arch, Send Marsh, Policy A43

- The increase in the number of houses from 400 to 550
- There is no provision for an increase to the current medical facilities and schooling
- An increase in excess of 37% in the number of houses is excessive.
- All previous objections to the lower number of houses has just been blatantly ignored
- This will join up Ripley and Send and is a massive over development
- This area is a flood plain and prone to flooding on a regular basis
- There is lead contaminating the ground in this area
- This is a green belt area containing an ancient woodland which will be lost
- There will be an unacceptable increase in the number of cars at a minimum at least an extra 800 cars. This will increase traffic problems and not help with them.

I object to: MM27, MM41, MM42 and MM48 Transport Strategy
- The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
- There has been no effective traffic impact assessment

Attached documents:

Comment: MM42 - LPMM18/2354  Respondent: L Smith 20729793  Agent:

I object to: MM42 Land at Burnt Common, London Road, Send, Policy A58
- The increase in sq feet to a "minimum" of 14,800 of the industrial and storage proposal.
- This is despite this been deleted from the 2014 plan
- This is an excessive increase and is massive compared to any other village in the borough.
- Slyfield is underutilised and this proves beyond any doubt that there is no requirement to destroy a village with this development on a green belt site
- There are no "special circumstances" and thus it contradicts Policy MM9
- The Employment Land Needs Assessment has shown that there is in fact a reduction in the demand for industrial land in this area
- The roads around this area are narrow and the increase in industrial traffic would significantly raise the levels of Nitrogen Dioxide creating health problems in the area.

I object to: MM27, MM41, MM42 and MM48 Transport Strategy
- The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
- There has been no effective traffic impact assessment

Attached documents:

Comment: MM44 - LPMM18/2355  Respondent: L Smith 20729793  Agent:

I object to: MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63
- This as this was actually deleted from an earlier draft due to all the objections and has now been re-inserted for the public examinations in July
- This is a new site for 120 homes including some self builds
- This is a green belt and there are no "special circumstances" so it also contradicts policy MM9
- This is an increase of 45% and is too much for our infrastructure in Send
- It will distract from the heritage buildings at Send Marsh Green and will not be an enhancement to the area
- The roads around this area are narrow and the increase in traffic would significantly raise the levels of Nitrogen Dioxide creating health problems in the area and increase pressure on the Send Crossroads.

Attached documents:
**Comment: MM48 - LPMM18/2360  Respondent: L Smith 20729793  Agent:**

**I object to: MM27, MM41, MM42 and MM48 Transport Strategy**

- The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
- There has been no effective traffic impact assessment

**I object** to any removal of villages from the Green Belt

**I object** to the disproportionate amount of development in one area of the Borough

**I object** to the lack of any evidence for the alleged housing need numbers

**I object** to the blatant ignoring of the well-established policies of the Green Belt (NPPG 79-83) to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities have been ignored in the proposals for Send. This plan will produce a huge overload on local and main roads, overcrowd our schools and put enormous pressure on the local surgery and hospitals. It will effectively join Send and Burpham along the A3 creating exactly the type of urban sprawl the Green Belt was set up to defend against

**I OBJECT** to the fact that this plan represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in "exceptional circumstances"

**THERE ARE NO EXCEPTIONAL CIRCUMSTANCES**

Attached documents:

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**Comment: MM9 - LPMM18/2356  Respondent: L Smith 20729793  Agent:**

**I object to: MM9 Green Belt Policy**

- These "modifications" do not protect the green belt around the village in any way whatsoever
- This is designated green belt land and there are no "special circumstances"
- This modification is unclear, subjective and has been done to deliberately create uncertainty and it is unbecoming of the council to even consider supporting this
- There is little reliable evidence or objective need assessment to justify such a massive development in Send's Green Belt
- The scale of development proposed for Send and Send Marsh/Burnt Common is excessive, unnecessary, and destructive to our community and Green Belt. There is NO justification for an overall additional 652 houses per annum. It goes absolutely against the principles of community planning and is no more than a green light to developers backed by Guildford Borough Council to carve up rural Surrey
- There has been no environmental impact assessment
- There has been no effective traffic impact assessment

Attached documents:

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**Comment: MM27 - LPMM18/2365  Respondent: T Smith 20729889  Agent:**
I object to: MM27, MM41, MM42 and MM48 Transport Strategy

- The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
- There has been no effective traffic impact assessment

Attached documents:

Comment: MM41 - LPMM18/2361  Respondent: T Smith 20729889  Agent:

I object to the Main Modifications

I object to: MM41 Land at Garlicks Arch, Send Marsh, Policy A43

- The increase in the number of houses from 400 to 550
- There is no provision for an increase to the current medical facilities and schooling
- An increase in excess of 37% in the number of houses is excessive.
- All previous objections to the lower number of houses has just been blatantly ignored
- This will join up Ripley and Send and is a massive over development
- This area is a flood plain and prone to flooding on a regular basis
- There is lead contaminating the ground in this area
- This is a green belt area containing an ancient woodland which will be lost
- There will be an unacceptable increase in the number of cars at a minimum at least an extra 800 cars. This will increase traffic problems and not help with them.

Attached documents:

Comment: MM41 - LPMM18/2366  Respondent: T Smith 20729889  Agent:

I object to: MM27, MM41, MM42 and MM48 Transport Strategy

- The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
- There has been no effective traffic impact assessment

Attached documents:

Comment: MM42 - LPMM18/2362  Respondent: T Smith 20729889  Agent:
I object to: MM42 Land at Burnt Common, London Road, Send, Policy A58

- The increase in sq feet to a "minimum" of 14,800 of the industrial and storage proposal.
- This is despite this been deleted from the 2014 plan
- This is an excessive increase and is massive compared to any other village in the borough.
- Slyfield is underutilised and this proves beyond any doubt that there is no requirement to destroy a village with this development on a green belt site
- There are no "special circumstances" and thus it contradicts Policy MM9
- The Employment Land Needs Assessment has shown that there is in fact a reduction in the demand for industrial land in this area
- The roads around this area are narrow and the increase in industrial traffic would significantly raise the levels of Nitrogen Dioxide creating health problems in the area.

Attached documents:

Comment: MM42 - LPMM18/2367  Respondent: T Smith 20729889  Agent:

I object to: MM27, MM41, MM42 and MM48 Transport Strategy

- The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
- There has been no effective traffic impact assessment

Attached documents:

Comment: MM44 - LPMM18/2363  Respondent: T Smith 20729889  Agent:

I object to: MM44 Land at Alderton's Farm, Send Marsh Road, Policy A63

- This as this was actually deleted from an earlier draft due to all the objections and has now been re-inserted for the public examinations in July
- This is a new site for 120 homes including some self builds
- This is a green belt and there are no "special circumstances" so it also contradicts policy MM9
- This is an increase of 45% and is too much for our infrastructure in Send
- It will distract from the heritage buildings at Send Marsh Green and will not be an enhancement to the area
• The roads around this area are narrow and the increase in traffic would significantly raise the levels of Nitrogen Dioxide creating health problems in the area and increase pressure on the Send Crossroads.

Attached documents:

Comment:  MM48 - LPMM18/2368  Respondent:  T Smith 20729889  Agent:

I object to: MM27, MM41, MM42 and MM48 Transport Strategy

• The impact of traffic for Send of Garlick's Arch, Burnt Common, Clockbarn and Alderton's added to the nearby Gosden Hill and Wisley/Ockham will not be adequately addressed by the A3 changes and the Clandon slip roads
• There has been no effective traffic impact assessment

I object to any removal of villages from the Green Belt

I object to the disproportionate amount of development in one area of the Borough

I object to the lack of any evidence for the alleged housing need numbers

I object to the blatant ignoring of the well-established policies of the Green Belt (NPPG 79-83) to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities have been ignored in the proposals for Send. This plan will produce a huge overload on local and main roads, overcrowd our schools and put enormous pressure on the local surgery and hospitals. It will effectively join Send and Burpham along the A3 creating exactly the type of urban sprawl the Green Belt was set up to defend against

I OBJECT to the fact that this plan represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in "exceptional circumstances"

THERE ARE NO EXCEPTIONAL CIRCUMSTANCES

Attached documents:

Comment:  MM9 - LPMM18/2364  Respondent:  T Smith 20729889  Agent:
I object to: MM9 Green Belt Policy

- These "modifications" do not protect the green belt around the village in any way whatsoever
- This is designated green belt land and there are no "special circumstances"
- This modification is unclear, subjective and has been done to deliberately create uncertainty and it is unbecoming of the council to even consider supporting this
- There is little reliable evidence or objective need assessment to justify such a massive development in Send's Green Belt
- The scale of development proposed for Send and Send Marsh/Burnt Common is excessive, unnecessary, and destructive to our community and Green Belt. There is NO justification for an overall additional 652 houses per annum. It goes absolutely against the principles of community planning and is no more than a green light to developers backed by Guildford Borough Council to carve up rural Surrey
- There has been no enviromental impact assessment
- There has been no effective traffic impact assessment

Attached documents:

Comment: MM45 - LPMM18/2381  Respondent: Mrs L Rose 20730753  Agent:

Ref: Local Plan Consultation Document: Main Modification 45, Flexford/Normandy Site A64

I wish to express my objections to the large number of proposed houses within the above site which would combine the settlement areas of Flexford and Normandy within designated Green Belt land for the following reasons:

1) I consider that the overall plan indicates overdevelopment for the Normandy and Flexford areas which will destroy the openness and rural environment which currently exists.

2) I object to the proposed development of a 105 houses within the boundaries of Site A64 which is all within Green Belt land.

3) Building on Green Belt land can only be considered if it can be shown that there are very special circumstances. Guildford Borough Council have not demonstrated any special circumstances within the Local Plan as to why it is necessary to remove this land from the protection of the Green Belt and is therefore against National Policy for the Protection of the Green Belt and I strongly object to the proposals. The intended purpose of the Green Belt is to maintain areas of green fields and natural beauty of the green fields which will be destroyed if Site A64 is allowed to be developed.

4) The proposed development is within sight of the Hogs Back and the Surrey Hills which are allocated as Areas of outstanding Natural Beauty and as such would be detrimental to the openness and beauty of this area.

5) There are many brownfield sites that exist within the GBC area which could be Used to meet the housing needs but the Main Modifications 45 document does not demonstrate that any of these sites have been considered to meet the demand of future housing requirements particularly in the next 5 years.

6)Whilst I may accept more houses are needed, if this site is approved for development of 105 homes, Normandy would increase by 7% and would eliminate the separateness of Flexford and Normandy hamlets.

7) Infrastructure

Traffic: There are no proposals to improve the existing road systems and footpaths within Normandy and the development would increase traffic and congestion from the resulting additional housing.
In Normandy the A323 suffers with congestion with the main junctions at Glaziers Lane and Westwood Lane as does the A324 at its junction with the A323 at Elm Hill. In particular Glaziers Lane has no continuous footpath from one end to the other and pedestrians have to cross the road twice where there is a humped back railway bridge and a blind bend.

8) Flooding: Flooding frequently occurs due to inadequate surface water drainage and also from the sewer pipes. Both of the system have insufficient capacity for the existing houses and would need to be significantly enlarged to prevent future flooding.

10) Utilities: The existing overhead Electricity supply would also need to be modernized as it frequently cuts off whenever there is high winds or heavy downfalls of rain.

11) Sustainability: There are no Grocery/General stores within the hamlets of Flexford, Normandy and Wyke to supply the household requirements of food and other domestic supplies and this development would increase the road traffic on the existing minor roads of Glaziers Lane and Westwood Lane.

12) Primary School/Nurseries: Wyke School does not have the capacity to absorb the potential increase of children from the increase in family homes necessitating additional building work to increase the number of classrooms required.

In conclusion, within the Main Modification Plan documentation, Site A64 seems to have been suddenly identified as suitable for development within the next 5 years without any appreciation of the designated requirements of the openness of the Green Belt and without any due consideration to any of the points raised above.

Attached documents:

Comment: MM41 - LPMM18/6258  Respondent: Mr Oliver Attard 20737601  Agent:

MM41 - the transport strategy modelling, which is used by your plan, is inadequate.

Attached documents:

Comment: MM2 - LPMM18/2478  Respondent: Mr Roger Simpson-Jones 20754529  Agent:

Dear GBC,

I have strong concerns regarding the local plan. Please note the following in considering the need for appropriate action to be taken.

The Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited. These could both reduce pressure on the green belt development and improve the areas of the town centre that are a poor relation to the High Street and potentially likely to undergo further deterioration without focused effort.

2. There is too much reliance on A3 improvements and they are beyond the council’s control. This create a plan that could fail and be blamed on others. Let's get a plan where we have a strong level of control from the Council.

3. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit.
4. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination.

5. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’. Furthermore, building outside of the town centre is likely to increase the traffic and pollution problems faced by Guildford.

The last 15 years have been a huge missed opportunity for Guildford town centre. In 15 years from now we could have a fantastic town centre (not just a great High Street), but the danger is that the current local plan fails to focus on driving the opportunity.

We have an opportunity to create great places and also make changes to drive significant modal shift (which won't happen on it's own, nor with the current difficulties with getting into town - just try cycling in the town centre or around the gyratory and you will realise why we don't see many cyclists in a town that is so close to areas that are amongst the most popular in the UK for leisure cycling.

My fear is that without a sound plan for the town centre we will be in a worse position than now and have failed to grasp the opportunity of creating a fantastic area before the bricks and mortar retail bubble pops. Please don't let this happen - take the right action now.

**Attached documents:**

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**Comment:** MM2 - LPMM18/2518  **Respondent:** Kelly Bradley 20754593  **Agent:**

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

A. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

C. I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:
D. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

E. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.
MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/2520  Respondent: Kelly Bradley 20754593  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/2519  Respondent: Kelly Bradley 20754593  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

F. The Guildford Vision Group’s Objections and Concerns Which I Share
MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/2522  Respondent: Kelly Bradley 20754593  Agent:

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2523  Respondent: Kelly Bradley 20754593  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2524  Respondent: Kelly Bradley 20754593  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2525  Respondent: Kelly Bradley 20754593  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2526  Respondent: Kelly Bradley 20754593  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2527  Respondent: Kelly Bradley 20754593  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2521  Respondent: Kelly Bradley 20754593  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM45 - LPMM18/2548  Respondent: Finnian James 20754721  Agent:

I am writing to object to Main Modification 45 dealing with policy A64.

I do not think that this is a suitable plot to build 105 new houses on for the following reasons:

1. It is green belt land that should not be built on
2. There is not the required infrastructure in place to support any increase in population to the village - traffic would be a big problem
3. No benefit to the community with this development - such as community halls or gardens
4. Previous refusals of planning applications due to impact on green belt and the environment

Please prevent any development of houses on site A64

Attached documents:
**Comment: MM41 - LPMM18/2549  Respondent: Rahim Krasniqi 20754785  Agent:**

I wish to strongly object to the following excessive developments which are planned for Send:

**MM41 Garlicks Arch**

The building of 400 new houses at Garlick’s Arch, Send March, is an unacceptable intrusion on Green Belt land and yet you are now proposing to increase the number of houses to 550 which makes the Green Belt invasion even worse. This will effectively join up Send and Ripley which comprises over-development resulting in urban sprawl and a massive increase in cars on already over-stretched roads in the neighbourhood, particularly the Portsmouth Road through Ripley to the A3.

**Attached documents:**

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**Comment: MM42 - LPMM18/2550  Respondent: Rahim Krasniqi 20754785  Agent:**

**MM42 Burnt Common**

The proposal to increase the land at Burnt Common, London Road, Send from 7,000 to 14,800 sq.m. of industrial and storage space is an excessively large burden of industrial space for the village of Send to have to bear. There is no evidence of the need to such a large area of industrial space in Send, and if the UK leaves the EU as a result of Brexit, demand for industrial space is actually likely to fall very significantly due to the reduction in the UK’s exports to Britain’s largest market, the EU. Therefore the allocation of even 7,000 sq ft of industrial space to Send should be reduced, not increased to 14,800 sq ft. The village does not need additional employment opportunities, it also does not need the increase in pollution from heavy goods vehicles, it does not need increased traffic congestion.

**Attached documents:**

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**Comment: MM44 - LPMM18/2551  Respondent: Rahim Krasniqi 20754785  Agent:**

**MM44 Aldertons Farm**

The proposed building of 120 new houses at Alderton’s Farm is a further invasion of Green Belt land of a rural and peaceful character. The proposed development is far too close to the ancient houses of 16th and 17th century historical interest at Send Green, and will result in yet more traffic congestion in Ripley and vibration damage to this village’s heritage buildings in the rush hours as commuters access the AS Northbound. It will mean at least 150 additional cars clogging the narrow Send Marsh Road, including at the crossroads at the junction of Send Marsh Road and Send Barnes Lane at one end of Send Marsh Road, as well as at the T junction of Send Marsh Road and the Portsmouth Road. Additionally the extra traffic will substantially increase the risk of accidents and injuries at the very sharp bend in Send Marsh Road at the junction of Polesden Lane.

**Attached documents:**

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**Comment: MM41 - LPMM18/2555  Respondent: Ereza Krasniqi 20754817  Agent:**
I wish to strongly object to the following excessive developments which are planned for Send:

**MM41 Garlicks Arch**

The building of 400 new houses at Garlick’s Arch, Send March, is an unacceptable intrusion on Green Belt land and yet you are now proposing to increase the number of houses to 550 which makes the Green Belt invasion even worse. This will effectively join up Send and Ripley which comprises over-development resulting in urban sprawl and a massive increase in cars on already over-stretched roads in the neighbourhood, particularly the Portsmouth Road through Ripley to the A3.

Attached documents:

**Comment: MM42 - LPMM18/2556  Respondent: Ereza Krasniqi 20754817  Agent:**

**MM42 Burnt Common**

The proposal to increase the land at Burnt Common, London Road, Send from 7,000 to 14,800 sq.m. of industrial and storage space is an excessively large burden of industrial space for the village of Send to have to bear. There is no evidence of the need to such a large area of industrial space in Send, and if the UK leaves the EU as a result of Brexit, demand for industrial space is actually likely to fall very significantly due to the reduction in the UK’s exports to Britain’s largest market, the EU. Therefore the allocation of even 7,000 sq ft of industrial space to Send should be reduced, not increased to 14,800 sq ft. The village does not need additional employment opportunities, it also does not need the increase in pollution from heavy goods vehicles, it does not need increased traffic congestion.

Attached documents:

**Comment: MM44 - LPMM18/2557  Respondent: Ereza Krasniqi 20754817  Agent:**

**MM44 Aldertons Farm**

The proposed building of 120 new houses at Alderton’s Farm is a further invasion of Green Belt land of a rural and peaceful character. The proposed development is far too close to the ancient houses of 16th and 17th century historical interest at Send Green, and will result in yet more traffic congestion in Ripley and vibration damage to this village’s heritage buildings in the rush hours as commuters access the AS Northbound. It will mean at least 150 additional cars clogging the narrow Send Marsh Road, including at the crossroads at the junction of Send Marsh Road and Send Barnes Lane at one end of Send Marsh Road, as well as at the T junction of Send Marsh Road and the Portsmouth Road. Additionally the extra traffic will substantially increase the risk of accidents and injuries at the very sharp bend in Send Marsh Road at the junction of Polesden Lane.

Attached documents:

**Comment: MM2 - LPMM18/2591  Respondent: Carole Partridge 20754849  Agent:**
The examinations should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking.

Also Woking's need figure has reduced and not been re-examined.

Please re-open the examination and amend the Plan to take account of these lower figures.

Attached documents:

Comment: MM9 - LPMM18/2558  Respondent: Carole Partridge 20754849  Agent:

With reference to MM9

Worplesdon is in the Green Belt, is an historic village with extensive Conservation Areas and Special Protection Areas with protected species in danger of extinction - and a site of Special Scientific Interest.

There has been no democratic consultation surrounding its sudden inclusion in the modified local plan.

Please therefore exclude it.

Attached documents:

Comment: MM2 - LPMM18/2572  Respondent: Barry Sterndale-Bennett 20754945  Agent:

Dear Sir/Madam

Ref: Guildford Borough Council’s Modified Local Plan consultation

As a local resident in West Clandon I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well. B. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because: 1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited. 2. There is too much reliance on A3 improvements and these are beyond the council’s control. 3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit. 4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’. C. I would like the Inspector to RE-EXAMINE the Local Plan because: 1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt. 2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high. In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

2. The Clandon Society Objections and Concerns Which I Share

The A247
I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road. The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247. I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents. What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge. The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh. The development of 1800 houses at Gosden Hill. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247. The conversion of the Burnt Common roundabout to an all-ways junction with the A37. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford. The £10 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are: 1. The junction with the current A3 south-bound slip road (modifications are underway). The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station. 4. The sight lines for the exit of the Onslow Arms car park. The narrowness of the road near Summers. Heavy
lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement. The sharp bend near Clandon Regis. The narrowness of the road at the Bull’s Head. The Clandon Junior School and the, in places, narrow footpath for children walking to school. The sharp bend with poor sight lines in either direction at the church. No continuous footpath through the length of the village. The speed of traffic. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt. The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker. The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites. Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

### 1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss. MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination. MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure e.g. excessive student homes in town, low economic participation. MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined. MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

**Comment:** MM23 - LPMM18/2574  **Respondent:** Barry Sterndale-Bennett 20754945  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limits should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority. In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford
Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation. The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM3 - LPMM18/2573  **Respondent:** Barry Sterndale-Bennett 20754945  **Agent:**

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

**Attached documents:**

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**Comment:** MM31 - LPMM18/2576  **Respondent:** Barry Sterndale-Bennett 20754945  **Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment:** MM32 - LPMM18/2577  **Respondent:** Barry Sterndale-Bennett 20754945  **Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

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**Comment:** MM33 - LPMM18/2578  **Respondent:** Barry Sterndale-Bennett 20754945  **Agent:**
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2579  Respondent: Barry Sterndale-Bennett 20754945  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2580  Respondent: Barry Sterndale-Bennett 20754945  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2581  Respondent: Barry Sterndale-Bennett 20754945  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2575  Respondent: Barry Sterndale-Bennett 20754945  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
I object to this amendment because given current shopping trends and the decline in the “High Street” there is far too much allocation for retail use in the town centre. The retail allocation should be put to better use, i.e. providing sustainable housing.

**Proposed Amendments to Guildford Borough Local Plan**

**General Objections**

I object to the Council unilaterally removing the Wisley Airfield Site from the Green Belt. They have no mandate from the people of Guildford and Surrey to do this.

It appears that the only reason for this dubious manoeuvre is to undermine the Secretary of State for the Environment’s decision that the Wisley Airfield development “would represent inappropriate development in the Green Belt, and should not be approved except in very special circumstances” and to try to get around the fact that the provision of housing is not an “exceptional circumstance.”

It is also illogical that GBC should take this action given that they unanimously supported the refusal of the original application, and because the conservative members stated in their election manifesto that they would not build on green belt land.

I also object to the Council’s failure to communicate adequately with residents about the current amendments to the Local Plan under the guise of compliance with GDPR. All the 32,000 or so persons who responded to the plan in 2016 should have been given the opportunity respond this time and not to have done so is a clear and unilateral disenfranchisement.

**Specific Objections**

**Amendment MM2**

I object to an amended plan for which the housing target out of date and based on incorrect information. The latest ONS statistics show a much reduced demand for housing and this needs to be reflected in the plan and on its own removes the requirement for Guildford to meet Woking’s housing shortfall.

The council has turned its own spatial strategy on its head and instead of concentrating on Brownfield sites in Guildford Town Centre where the big landowners like Network Rail, Legal and General and Guildford Corporation would be more than happy to realise the increase the value of that a change to residential use would bring. Building in the Green Belt and rural areas should be a last resort.

The addition of another 500 houses in Send (which will be car dependent) will have a severe impact on Portsmouth Road Ripley, and the A3 and there is no indication that this has been given proper consideration.

**Attached documents:**
I object to (Policy D1) which dilutes the requirement for the social dimensions of sustainability (e.g. walking distances and pedestrian and cycle routes) and the fact that strategic sites are to be exempt from design constraints, which I consider to be a “developers charter” and abdicates GBC’s responsibility for development control to the detriment of adjoining owners and residents.

Attached documents:

Comment: MM3 - LPMM18/2609  Respondent: Kris Nasta 20762433  Agent: 

Policy S3

I object to the fact that the town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/2615  Respondent: Kris Nasta 20762433  Agent: 

I object to the amendments relating to this site as follows:

1. The addition of land to the south of the appeal site does not mitigate the density issue as much as it appears to on the plan as building is not permitted within a certain radius the Ockham VOR (vhf omni-directional range) air traffic control beacon).

2. The land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.

3. In breach of case law an Appropriate Assessment and a Habitats Regulation Assessment have not been completed.

Conclusion

Due to the inadequacies and shortcomings listed above and the fact that so many people have been excluded from this consultation I hereby call for the examination in public be re-opened.

Attached documents:

Comment: MM41 - LPMM18/2613  Respondent: Kris Nasta 20762433  Agent: 

I object to the fact that the proposed Transport Strategy places far too much reliance on infrastructure improvements some of which are uncertain and all of which are beyond the council’s control and have no fixed timescale. There is already a 2 year delay on Highways England RIS scheme for J10 of the M25 and this has a direct effect on the development of Site A35 – TFM; Site A43 – Garlicks Arch; and Site MM44 – Aldertons Farm].

Attached documents:
I object to the fact that the size of the SNCI has been drastically reduced. The whole site qualifies on ecological grounds and there is no valid justification for altering the SNCI boundary. The biodiversity of the SNCI will also be destroyed by the proposed development.

Attached documents:

I object to the reliance on “infilling” in and around villages, which is overdone and will result in the weakening of protection of the countryside.

Attached documents:

**MM2, MM41, MM42 and MM48 Transport Strategy**

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

**Other developments**

- The travellers’ site on Send Hill will exacerbate all the problems mentioned above and make the overall impact on Send significantly detrimental to all those living in this part of the world.

Attached documents:

**MM27, MM41, MM42 and MM48 Transport Strategy**

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

Attached documents:
I am writing to object to the modifications resulting from the Planning Inspector’s Report impacting the village of Send within Guildford Borough. Overall, the danger is that, if the proposals / modifications go ahead, Send will be transformed in such a way that its village identity will be permanently destroyed. Linked to this, there will be significantly increased congestion, pollution and resulting damage to the environment. This will impact residents both in Guildford Borough and beyond. My objections are:

**Main Modification 41 (Land at Garlick’s Arch, Send Marsh, Policy A43) because:**

- An increase of 37% in the number of houses will destroy the village identity
- It ignores 7,000 objections already lodged
- It is Green Belt containing ancient woodland and that should be protected.
- It will join up two separate villages (Send and Ripley) without sufficient school places with the recent closure of Ripley Primary school and no extra capacity at Send Primary school
- The site is subject to frequent flooding (a flood zone 2 area) and contamination by lead shot
- The extra cars will block up the adjacent roads and increase air pollution of carbon monoxide, nitrogen monoxide and nitrogen dioxide
- Medical facilities will be unable to cope with the increased demand

**Attached documents:**

**Comment:** MM41 - LPMM18/2634  **Respondent:** Rebecca Green 20762817  **Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

**Attached documents:**

**Comment:** MM42 - LPMM18/2633  **Respondent:** Rebecca Green 20762817  **Agent:**

**MM42 (Land at Burnt Common, London Road, Send A58) because:**

- It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan
- With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East.
- The concentration in Send is more severe than any other part of the Guildford Borough. This seems unfair
- The industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not the proposed huge allocation of over 10 hectares at Send – and in the Green Belt
- Once again, the impact on congestion will be significant as will Nitrogen dioxide levels causing potential damage to health

**MM27, MM41, MM42 and MM48 Transport Strategy**

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock
**Comment: MM44 - LPMM18/2636  Respondent: Rebecca Green 20762817  Agent:**

**MM44 (Land at Alderton’s Farm, Send Marsh Road Policy A 63):**

- It is a Green Belt site with no special circumstances so it contradicts MM9
- The additional traffic will increase pressure on Send Crossroads. Living at these cross roads, I can testify to the fact that it is very difficult to get out of our drive at rush hour as traffic is tailed back to the A3. Once again, air pollution affects our garden and environs

**Comment: MM48 - LPMM18/2639  Respondent: Rebecca Green 20762817  Agent:**

**MM27, MM41, MM42 and MM48 Transport Strategy**

- There has been no adequate assessment by GBC of the impact of this transport strategy on congestion, noise pollution and air pollution as thousands more cars head to Woking each day. There is the possibility of gridlock

**Comment: MM9 - LPMM18/2637  Respondent: Rebecca Green 20762817  Agent:**

**MM9 Green Belt policy**

- This introduces a very subjective test and actually negates Green Belt policy. Speculators may be able to ‘pick off’ land at the edge of the village

**Comment: MM2 - LPMM18/2695  Respondent: Linda Crawford 20767969  Agent:**

Please can you tell me when the population and household figures produced by the Office for National Statistics state that we actually only need 360 extra homes per year, and not nearly 672 as previously stated, are they still going to remove villages from the Green Belt? Does this mean that developers would be given a free reign to build, build, build? There are NO exceptional circumstances for insetting, as brownfield sites should always be used for development first.

**Attached documents:**
Comment: MM2 - LPMM18/2701  Respondent: Roger Parslow 20768001  Agent:

My initial objection is to: MM41, MM42, MM44, MM9, MM27.

POLICY S2.

At the public examination the figure for Guildford B.C. housing need used by the inspector was 789 per year. This figure was obtained by G.B.C Consultants and was greatly exaggerated by including Surrey University Student figures. These Consultants and GBC refused to disclose how this figure was calculated.

The figure now published by a highly respected consultancy Barton Wilmore has said the correct figure is 431 houses per year.

The data from the Office of National Statistics, doing population forecasts says the appropriate growth in GBC can be achieved by 460 houses per year.

This latest data makes a mockery of G.B.C consultants figures which have always been very suspect.

I trust the Inspector and GBC will now drastically reduce the housing need to reflect the true figures, and particularly in our already very congested village of Send.

MM27. MM41. MM42, and MM48 Transport Strategy.

Why have the effect of thousands more cars in an already heavily congested area not been taken into account?

The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

MM41 Land at Garlicks Arch, Send Marsh. Policy A43.

I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years.

This is an increase of 37% in the number of houses to be built.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking. This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

Up to a thousand cars and between 1600 to 1700 extra people will block the surrounding roads and overwhelm the already full to capacity schools and health facilities, sewage, water etc.

Why have over 7000 objections to the earlier plan been ignored and more houses etc added?

MM42. Land at Burnt Common. London road Send Policy A58.

As the Employment Lands Needs Assessment showed a reduction in demand for Industrial Land why has again Send been picked on again to have the largest industrial allocation in any village in the Borough, is it politics?

This is a further increase of 25% making it a huge increase in Send, bigger than any other village.

There is no need for new industrial sites when Slyfield is has unused capacity. There are NO SPECIAL CIRCUMSTANCES so it contradicts MM9.
There is no need to put Industrial premises in our precious GREEN BELT. This plan has since being deleted from 2014 plans, has been increased twice from 7000 to a MINIMUM of 14800 sq m.

MM44 Land at Aldertons Farm, Send Road, Policy A63.

New site for 120 homes which was deleted because of objections and not reinserted until the public examination in JULY. With Garlicks Arch 550, Clockbarn 60 ,Winds Ridge 40, that means 770 houses to the 1700 currently in Send AN INCREASE OF 45%

How are our roads,sewage,water,healthcare,schools etc going to allow us to live normal lives in this polluted gridlocked stressful environment. Again this is GREEN BELT and with NO special circumstances and contradicts policy MM9.

**MM9 GREEN BELT POLICY.**

How can you say the modifications claim to protect our precious GREEN BELT except in very special circumstances ? GBC make an exception for LIMITED INFILLING OUTSIDE THE IDENTIFIED SETTLEMENT BOUNDARIES WHERE IT CAN BE DEMONSTRATED THAT THE SITE SHUOLD BE CONSIDERED TO BE WITHIN THE VILLAGE.

This is a catch all statement which is completely subjective causing complete uncertainty and completely negates GREEN BELT PROTECTION. Virtually any land on the then ever increasing edges of the village can be picked off by developers and is open season for speculators at the expense of villagers.

I wish the above objections to be considered and this huge imposition of housing and commercial development to be largely abandoned.

**Attached documents:**

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**Comment: MM27 - LPMM18/2700**  **Respondent:** Roger Parslow 20768001  **Agent:**

My initial objection is to : MM41,MM42,MM44,MM9, MM27.

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**MM27. MM41, MM42, and MM48 Transport Strategy.**
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The increased traffic for Send from Burnt Common Garlicks Arch, Aldertons, Clockbarn in addition to Gosden Hill and Wisley Ockham is not in any meaningful fashion addressed by the Road changes of the A3 and Clandon Slip Roads. They seem both the developers and GBC to offer narrative and not action.

This massive increase in traffic of all sorts heading to and from Woking along Send Barns Road and Send Road will cause horrendous noise, air pollution delays and gridlock.

**MM41 Land at Garlicks Arch, Send Marsh. Policy A43.**
I object to the increase from 400 to 550 houses of which 450 are to be built in the first 5 years. This is an increase of 37% in the number of houses to be built.

Despite the promises by the developers and GBC the ancient woodland after hundreds of years of peace will be ruined once the fuss has died down and nobody is checking. This over development will effectively join Ripley to Send, and spoil the wisdom of our Green Belt Planners of many years ago.

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Attached documents:

Comment: MM44 - LPMM18/2698  Respondent: Roger Parslow 20768001  Agent:

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**Attached documents:**

**Comment:** MM48 - LPM18/2702  **Respondent:** Roger Parslow 20768001  **Agent:**

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**Attached documents:**

**Comment:** MM9 - LPMM18/2699  **Respondent:** Roger Parslow 20768001  **Agent:**

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Attached documents:

**Comment: MM51 - LPMM18/2712  Respondent: G.B and S.J Lovegrove 20768321  Agent:**

Main Modification 2018 – Sept 2018

Amendment 1; Horsleys – West Horsley (South) (MM51) – map page 84

We firmly and totally approve the modification in the Reference above.

Attached documents:
Comment: MM2 - LPMM18/2726  Respondent: Mrs Yvonne E Murray 20768705  Agent:

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

Attached documents:

Comment: MM2 - LPMM18/2731  Respondent: Mrs Yvonne E Murray 20768705  Agent:

The current draft of the Local Plan is unsound because:-

1. The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.

Attached documents:

Comment: MM2 - LPMM18/2734  Respondent: Mrs Yvonne E Murray 20768705  Agent:

4. There is no policy dealing with urban areas beyond the town centre such as the one where we live.
5. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

Attached documents:

Comment: MM23 - LPMM18/2729  Respondent: Mrs Yvonne E Murray 20768705  Agent:

MM23 policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/2728</th>
<th>Respondent: Mrs Yvonne E Murray 20768705</th>
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<tbody>
<tr>
<td>MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.</td>
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<th>Respondent: Mrs Yvonne E Murray 20768705</th>
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<tbody>
<tr>
<td>MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites.</td>
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<td>MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.</td>
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<td>MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.</td>
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<td>MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.</td>
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<td>MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.</td>
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<td>3. Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.</td>
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### Comment: MM9 - LPMM18/2732  
**Respondent:** Mrs Yvonne E Murray 20768705  
**Agent:**

2. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

**Attached documents:**

### Comment: MM51 - LPMM18/2795  
**Respondent:** John Proctor 20769281  
**Agent:**

I give my firm approval to this modification to protect the rural character and unspoilt tranquillity of our village.

**Attached documents:**

### Comment: MM2 - LPMM18/2828  
**Respondent:** Rebecca AJ Gillmore 20769505  
**Agent:**

*Guildford Borough Council’s Modified Local Plan consultation*

I would like you to note my following comments as a resident of West Clandon for 14 years.

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
   2. There is too much reliance on A3 improvements and these are beyond the council’s control.
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit.
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’. Just wishing...  
5. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.
The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
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7. The sharp bend near Clandon Regis
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10. The sharp bend with poor sight lines in either direction at the church
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13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

   **MM2** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

   **MM2** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

   **MM2** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

   **MM2** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   **MM2** Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**
Comment: MM23 - LPMM18/2831  Respondent: Rebecca AJ Gillmore 20769505  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of “**green approaches**” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

Comment: MM23 - LPMM18/2839  Respondent: Rebecca AJ Gillmore 20769505  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined carefully.

**Attached documents:**

Comment: MM3 - LPMM18/2829  Respondent: Rebecca AJ Gillmore 20769505  Agent:

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden **grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

Comment: MM3 - LPMM18/2838  Respondent: Rebecca AJ Gillmore 20769505  Agent:
1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/2832  Respondent: Rebecca AJ Gillmore 20769505  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2833  Respondent: Rebecca AJ Gillmore 20769505  Agent:

MM32 A height limit for White Lion Walk is required.

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Comment: MM33 - LPMM18/2834  Respondent: Rebecca AJ Gillmore 20769505  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2835  Respondent: Rebecca AJ Gillmore 20769505  Agent:
MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

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**Comment: MM41 - LPMM18/2836  Respondent: Rebecca AJ Gillmore  20769505  Agent:**

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

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**Comment: MM44 - LPMM18/2837  Respondent: Rebecca AJ Gillmore  20769505  Agent:**

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment: MM9 - LPMM18/2830  Respondent: Rebecca AJ Gillmore  20769505  Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment: MM2 - LPMM18/2840  Respondent: Amelia Gillmore  20769601  Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments as a resident of West Clandon for 14 years.

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine.
2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
1. I would like the Inspector to RE-EXAMINE the Local Plan because:

2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (e.g. through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.

2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.

3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.

4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
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4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
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**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.
Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the
town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound
basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes
table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic
growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the
Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student
homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is
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been examined.

MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a)
is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

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**Comment:** MM23 - LPMM18/2843  **Respondent:** Amelia Gillmore 20769601  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of
development. This would be compatible with sites creating their own identity and would avoid “could be anywhere”
estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of “**green approaches**” should clearly include protecting and enhancing greenness along transport
corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29
should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the
town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the
downs in the urban landscape.

**Attached documents:**

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**Comment:** MM23 - LPMM18/2851  **Respondent:** Amelia Gillmore 20769601  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations
as imposed on the other strategic site owners by the council as planning authority.
In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM3 - LPMM18/2841  **Respondent:** Amelia Gillmore 20769601  **Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

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**Comment:** MM3 - LPMM18/2850  **Respondent:** Amelia Gillmore 20769601  **Agent:**

1. The Guildford Vision Group’s Objections and Concerns Which I Share

   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

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**Attached documents:**

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**Comment:** MM31 - LPMM18/2844  **Respondent:** Amelia Gillmore 20769601  **Agent:**

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

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**Attached documents:**
Comment: MM32 - LPMM18/2845  Respondent: Amelia Gillmore 20769601  Agent:

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MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2847  Respondent: Amelia Gillmore 20769601  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

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MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

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Comment: MM44 - LPMM18/2849  Respondent: Amelia Gillmore 20769601  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:
Comment: MM9 - LPMM18/2842  Respondent: Amelia Gillmore 20769601  Agent: 

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/2858  Respondent: Olivia Gillmore 20769729  Agent: 

I would like you to note my following comments as a resident of West Clandon for 14 years. I agree with my parents who have also emailed you with their concerns.

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’. Just wishing

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
   2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

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**Attached documents:**

**Comment:** MM23 - LPMM18/2861  **Respondent:** Olivia Gillmore 20769729  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.
Promotion of "green approaches" should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

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**Comment:** MM23 - LPMM18/2869  **Respondent:** Olivia Gillmore 20769729  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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**Comment:** MM3 - LPMM18/2859  **Respondent:** Olivia Gillmore 20769729  **Agent:**

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

**Attached documents:**

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**Comment:** MM3 - LPMM18/2868  **Respondent:** Olivia Gillmore 20769729  **Agent:**

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.
MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM31 - LPMM18/2862  Respondent: Olivia Gillmore 20769729  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/2863  Respondent: Olivia Gillmore 20769729  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/2864  Respondent: Olivia Gillmore 20769729  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/2865  Respondent: Olivia Gillmore 20769729  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/2866  Respondent: Olivia Gillmore 20769729  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/2867  Respondent: Olivia Gillmore 20769729  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/2860  Respondent: Olivia Gillmore 20769729  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM23 - LPMM18/2885  Respondent: Tony and Judith Jessett 20770081  Agent:

1. MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority

Attached documents:

Comment: MM3 - LPMM18/2884  Respondent: Tony and Judith Jessett 20770081  Agent:

1. MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
2. MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

3. MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM41 - LPMM18/2941  
Respondent: Sheila Brown 20770401  
Agent:

I submit herewith my comments on the above.

My name is Mrs Sheila Brown and my address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] and I am writing to object to the proposed number of houses that the GBC want to build in Send which seems totally over the top for a village of this size. I have written several times over the past few years giving the same reasons ie Send is a village that does not want to be a suburb of Guildford and does not have the infrastructure in place to accept even a tenth of the proposed buildings because there is no sign that any improvements to roads, schools and health provision within the village to make this possible have even been considered.

So what am I objecting to this time round?

1. **MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

550 homes will mean at least 800 extra cars on the roads, with families going to places of work, to schools, to nearby towns to shop. With a very minimal bus service, car travel will be the only way. And 550 will mean at least 1000 extra children trying to fit into already overcrowded schools, not forgetting that the only Primary school in Ripley has already closed! And where are the prospective house buyers coming from? Or are they all to be small houses for rent, with occupiers coming from a wide area?

The site has been deemed as unsuitable for housing as it is liable to flooding and is contaminated by lead shot and is still Green Belt Land so how does that make the proposed house building viable?

Attached documents:

Comment: MM42 - LPMM18/2942  
Respondent: Sheila Brown 20770401  
Agent:

2. **MM42 Land at Burnt Common, London Road, Send, Policy A58**

How can you justify 14800sq .m of industrial and storage at the above site when there is still unused capacity at Slyfield? Again it is Green Belt Land and the Employment Land Needs Assessment has shown that there is actually a reduction in demand for industrial land. Also there is a proposed 25% increase the Send Business Centre which, although has no proven demand, could gridlock the surrounding roads which are very narrow.

Attached documents:
3. MM44 Land at Aldertons Farm, Send Marsh Road, Policy A63

Yet another proposed 120 homes in Send, again on Green Belt Land with people and traffic needing to travel at peak times through Send.

Trusting that this time my letter will be taken into account,

Attached documents:

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MM27 MM41 MM42 AND MM48 Transport Strategy

Any plans involving developments in this area must take into consideration the huge developments now taking place in Woking, which will act as a magnet for vehicle traffic both to and from all surrounding areas. Residents of the new houses will inevitably want to take advantage of the new shopping and employment opportunities in Woking. Projects like Victoria Square and the St Dunstan's tower block, already well advanced, will generate traffic both into Woking and out to the Surrey countryside, and the A247 through Send towards Newands Corner, and Dorking etc. This can only lead to greater traffic congestion.

Attached documents:

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MM41 Land at Garlick’s Arch, Policy A43

I wish to object to the proposed increase in houses planned for this site. The number of houses planned for the Send area is grossly excessive when related to the current population of the village. I understand that some 7,000 objections were raised to the previous number of 400 houses, but these objections have been ignored. The subsequent increase seems not to be in the spirit of prudent planning, but sheer vindictiveness. Retribution is not the function of a Planning Department. This, as you know, is Green Belt land and large-scale development on such land is totally inappropriate.

As a resident of Send for over 30 years, I notice that increasingly roads such as the A247, which serves this site, are more and more frequently subject to traffic jams, caused by sheer weight of traffic, exacerbated by the many road works and temporary traffic lights that have become a feature of life in this area. Instances of this include the rebuilding of bridges on Newark Lane, the rebuilding of Cart Bridge on the A247, the current water mains work on Portsmouth Road Ripley. All of these have caused heavy tailbacks which all affect the A247 through Send. Adding so many houses at Garlick’s Arch will make this even worse.

All this housing will inevitably give rise to greater demand of the Villages Medical Centre, which is already extremely busy and it is difficult enough now to get appointments. In the same way, Send Primary School will be unable to cope with the extra children which are always a feature of new housing developments.

Attached documents:
Comment: MM41 - LPMM18/2984  Respondent: William Pyne 20773697  Agent:

MM27 MM41 MM42 AND MM48 Transport Strategy

Any plans involving developments in this area must take into consideration the huge developments now taking place in Woking, which will act as a magnet for vehicle traffic both to and from all surrounding areas. Residents of the new houses will inevitably want to take advantage of the new shopping and employment opportunities in Woking. Projects like Victoria Square and the St Dunstan's tower block, already well advanced, will generate traffic both into Woking and out to the Surrey countryside, and the A247 through Send towards Newlands Corner, and Dorking etc. This can only lead to greater traffic congestion.

Attached documents:

Comment: MM42 - LPMM18/2980  Respondent: William Pyne 20773697  Agent:

MM42 Land at Burnt Common, London Road, Policy A58

I object to the doubling in size of the proposed industrial and storage development. I understand that the Employment Land Needs Assessment shows a reduction in demand for industrial land, so it is perverse to increase the provision. If, however, this development takes place and filled, the additional traffic through both Send and Ripley will cause congestion on a grand scale. In view of the fact that most goods vehicles are Diesel or petrol powered, this will increase pollution levels.

Attached documents:

Comment: MM42 - LPMM18/2985  Respondent: William Pyne 20773697  Agent:

MM27 MM41 MM42 AND MM48 Transport Strategy

Any plans involving developments in this area must take into consideration the huge developments now taking place in Woking, which will act as a magnet for vehicle traffic both to and from all surrounding areas. Residents of the new houses will inevitably want to take advantage of the new shopping and employment opportunities in Woking. Projects like Victoria Square and the St Dunstan's tower block, already well advanced, will generate traffic both into Woking and out to the Surrey countryside, and the A247 through Send towards Newlands Corner, and Dorking etc. This can only lead to greater traffic congestion.

Attached documents:

Comment: MM44 - LPMM18/2981  Respondent: William Pyne 20773697  Agent:

MM44 Land at Alderton's Farm Policy A63

I object to this proposal mainly on the grounds of increased traffic as previously explained. Send Marsh Road has some narrow sections and at busy times junctions with other roads are not very safe. This also is Green Belt land which can only be developed by “limited infilling”. 120 homes are more than “limited infilling”.

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**Comment:** MM48 - LPMM18/2986  **Respondent:** William Pyne 20773697  **Agent:**

**MM27 MM41 MM42 AND MM48 Transport Strategy**

Any plans involving developments in this area must take into consideration the huge developments now taking place in Woking, which will act as a magnet for vehicle traffic both to and from all surrounding areas. Residents of the new houses will inevitably want to take advantage of the new shopping and employment opportunities in Woking. Projects like Victoria Square and the St Dunstan's tower block, already well advanced, will generate traffic both into Woking and out to the Surrey countryside, and the A247 through Send towards Newlands Corner, and Dorking etc. This can only lead to greater traffic congestion.

**Attached documents:**

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**Comment:** MM9 - LPMM18/2982  **Respondent:** William Pyne 20773697  **Agent:**

**MM9 Green Belt Policy**

MM41 and MM44 directly conflict with this policy (see previous objections above).

**Attached documents:**

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**Comment:** MM2 - LPMM18/3009  **Respondent:** Richard Algeo 20774273  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. **I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.**

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.
MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

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**Comment: MM23 - LPMM18/3020  Respondent: Richard Algeo 20774273  Agent:**

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In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

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**Comment: MM3 - LPMM18/3019  Respondent: Richard Algeo 20774273  Agent:**

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Attached documents:

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Attached documents:

Comment: MM41 - LPMM18/3017  Respondent: Richard Algeo 20774273  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/3018  Respondent: Richard Algeo 20774273  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

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Comment: MM9 - LPMM18/3011  Respondent: Richard Algeo 20774273  Agent:

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MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

Attached documents:

Comment: MM2 - LPMM18/3021  Respondent: Michael and Marina Dominicus 20774337  Agent:

The current draft of the Local Plan is unsound because:-

1. The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.
2. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
3. Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.
4. There is no policy dealing with urban areas beyond the town centre such as the one where we live.
5. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

Attached documents:

Comment: MM23 - LPMM18/3024  Respondent: Michael and Marina Dominicus 20774337  Agent:

MM23 policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority.

Attached documents:

Comment: MM27 - LPMM18/3023  Respondent: Michael and Marina Dominicus 20774337  Agent:

2280 of 2554
Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

Comment: MM3 - LPMM18/3022  Respondent: Michael and Marina Dominicus 20774337  Agent:

MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

Comment: MM3 - LPMM18/3025  Respondent: Michael and Marina Dominicus 20774337  Agent:

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

Comment: MM2 - LPMM18/3040  Respondent: Peter Drew 20774497  Agent:

- Housing numbers must reflect the latest ONS data and projections. The public hearings on housing should be re-opened and the subject re-examined in the light of the most up-to-date data.
- As the above points demonstrate, the grounds set out in the plan for green belt development are inadequate and certainly do not represent 'exceptional circumstances'.

After 30 years, I still feel privileged to be able to live in Guildford. It is an exceptional town, set in beautiful countryside. We have the opportunity of addressing today's problems of transport, housing, infrastructure et al in a coordinated, consistent and elegant manner and thus enhance the experience of living in Guildford for future generations of towns people and businesses. In order for this to happen, the Local Plan must be revisited.
Thank you for the opportunity to respond to the consultation. It is with regret that, after so much work, I find it necessary to declare the plan unsound for the following reasons:

- It is clear that the brownfield opportunities, especially in the town centre, have not been, by any measure, fully exploited. The council has thus not properly observed its hierarchy of development.
- It is also clear that a significant part of the plan is dependent on A3 improvements which are beyond the council's control and thus represent a high risk element within the plan.
- As a result the town centre policy is inadequate. In addition, it does not address the infrastructure deficit.

Submission Local Plan. Strategy and Sites in Guildford Borough

Main Modifications

MM2 4.1.9.ac

Urban extension to Godalming, 200 homes at Aarons Hill

Although we live in Waverley Borough, our home is only 500 yards from the above field, and we wish to comment on the proposal to allocate this site for housing.

Masterplan

A masterplan is required by Inspector Bore setting out how a high quality development can be achieved both in conjunction with and without development of the Waverley site before the Guildford land can be allocated to housing as a strategic housing site. No such plan has been published and in our view it is essential that this should be achieved before the proposal is progressed. There would need to be much negotiation between the Boroughs before an integrated proposal which is viable could be achieved.

Sustainability

The development is not sustainable. The infrastructure is totally inadequate for such a large number of dwellings on the combined sites. Aarons Hill is not well connected to Godalming town centre. Car access will be required and the road network would need major road widening and alteration to accommodate the huge increase in traffic, which would change the character of this historic country town and beautiful area.

Overall, for the above reasons, we object strongly to the Modification in respect of the Guildford Aarons Hill site.

Thank you for considering our representations.
Green Belt MM9

This land has been in agricultural use for over 75 years as part of the Metropolitan Green Belt. It has also been within an AGLV. The adjacent bridleway is much used by the local community, providing splendid views, for walkers and cyclists, across open landscape to Blackdown, the Devil’s Punchbowl and, on a clear day, the South Downs on the horizon. Sunsets are spectacular. It has not been demonstrated that there are special circumstances to justify Inspector Bore’s recommendation that it be withdrawn from the Green Belt and AGLV status. Under the 2018 NPPF the Council is required to do a detailed prior assessment of whether the local housing need can be met in other ways including uses of brownfield sites. The NPPF 2018 at paragraph 170 requires planning decisions to recognise “the intrinsic beauty of the countryside”.

Unfortunately, the consultation period on the Main Modifications closes on 23rd October, which is likely to be before the final judgement on the Judicial Review of Waverley Borough Council’s decision to remove their Aarons Hill site from the Green Belt and AGLV in LPP1 and the proposed housing numbers. The outcome of these proceedings could affect issues for the Guildford site.

Attached documents:

Submission Local Plan. Strategy and Sites in Guildford Borough

Main Modifications

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[Regarding Site A61 Aarons Hill]

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Attached documents:

Comment: MM27 - LPMM18/3079  
Respondent: Heather Pennells  
20775137  
Agent:

MM27 MM41 MM42 MM48

The traffic implications on the local roads will result in excessive congestion as well as the local trunk roads

Attached documents:

Comment: MM41 - LPMM18/3075  
Respondent: Heather Pennells  
20775137  
Agent:

Please accept this email as an objection

MM41

Increase in number of housing is excessive

The green belt contains ancient woodland

Over development

The land floods and is contaminated

The roads cant come with additional traffic, the roads are already congested

Public services and not cope

Attached documents:
Comment: MM41 - LPMM18/3080  Respondent: Heather Pennells 20775137  Agent:

MM27 MM41 MM42 MM48

The traffic implications on the local roads will result in excessive congestion as well as the local trunk roads

Attached documents:

Comment: MM41 - LPMM18/3083  Respondent: Heather Pennells 20775137  Agent:

Other developments proposed

Send Hill travellers site, the road is not suitable to take additional traffic, especially larger vehicles. The road is not of sufficient width and does not have footpaths or lighting.

Please accept this email as an objection

Attached documents:

Comment: MM42 - LPMM18/3076  Respondent: Heather Pennells 20775137  Agent:

MM42

The industrial allocation is too large for the villages

The area is green belt.

Slyfield nearby is underutilised.

Send Business Centre is also increasing, do both need to increase?

Roads will not cope with the additional industrial traffic

Attached documents:

Comment: MM42 - LPMM18/3081  Respondent: Heather Pennells 20775137  Agent:

MM27 MM41 MM42 MM48

The traffic implications on the local roads will result in excessive congestion as well as the local trunk roads

Attached documents:
Comment: MM44 - LPMM18/3077  **Respondent:** Heather Pennells 20775137  **Agent:**

MM44

Its green belt

Contradicts MM9

Detract from the heritage buildings locally in Send Marsh

Send crossroads, and local roads will not cope with the additional traffic

With the additional housing proposed the area will be too over developed

**Attached documents:**

Comment: MM48 - LPMM18/3082  **Respondent:** Heather Pennells 20775137  **Agent:**

MM27 MM41 MM42 MM48

The traffic implications on the local roads will result in in excessive congestion as well as the local trunk roads

**Attached documents:**

Comment: MM9 - LPMM18/3078  **Respondent:** Heather Pennells 20775137  **Agent:**

MM9

The green belt should be protected

**Attached documents:**

Comment: MM44 - LPMM18/3084  **Respondent:** C R Gibbons 20775233  **Agent:**

I am writing as a long standing resident of Send Marsh in response to the current development proposals in our area.

We are proud of the unique character of our hamlet and of our close links with both Ripley and Send, both of which also have their own distinct character.

The proposed development at Alderton’s Farm in particular, which I have noted was removed from an earlier draft, is sited on a Green Belt area and would seem to contravene the policy as mentioned in MM9. Part of the special appeal of our area is the impressive manor house and other heritage buildings situated by the village green. A plan for 120 buildings would seem to me to be very much out of character with that area and would certainly detract from it.
This planned project, along with what is proposed for Garlick’s Arch, Clockbarn and Winds Ridge seems excessive. Send Crossroads and the local roads are already very busy throughout the day and adding what I believe would be an increase in around 45% would be a ‘step too far’

especially as the infrastructure is not in place to cope with that kind of upsurge - in particular the local schools and medical centre, as well as the local lanes.

I would urge you to listen to what the local residents have to say about this area and reconsider the extent of the final proposals, without dismissing those who voice their sincere opinions as whining nimbys.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/3107</th>
<th>Respondent: Harriet Doyle 20775585</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I am a resident of Send Marsh and object to the following Main Modifications to the local area.</td>
<td></td>
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<tr>
<td>MM41 - Land at Garlicks Arch, Send Marsh, policy A43</td>
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<tr>
<td>I object to this on the following grounds;</td>
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<tr>
<td>This is Green Belt land</td>
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<td>proposed new development is excessive</td>
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<tr>
<td>it will destroy the ancient woodland at the site</td>
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<tr>
<td>Will further add to the existing flooding issue</td>
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<tr>
<td>Extra cars will block up the existing busy roads</td>
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<td>Impact the already strained local services such as schools and medical facilities</td>
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<tr>
<th>Comment: MM42 - LPMM18/3108</th>
<th>Respondent: Harriet Doyle 20775585</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>MM42 - Land at Burnt Common, London Road, Send, policy A58</td>
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<td>I object to this on the following grounds;</td>
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<td>Area has doubled from previous expansion proposals</td>
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<tr>
<td>No need for new industrial site when extra capacity at Slyfield is not used</td>
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<td>Will result in already busy narrow local roads being further gridlocked</td>
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<tr>
<td><strong>MM44 - Land at Alderton’s Farm, Send Marsh Road, policy A63</strong></td>
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<tr>
<td>I <strong>object</strong> to this on the following grounds;</td>
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<tr>
<td>• This is Green Belt land</td>
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<td>• The additional traffic together with other proposed developments will further gridlock crossroad</td>
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<td>• The existing poor drainage and flooding of local gardens will worsen</td>
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<tr>
<td>• With other locally proposed new development, this will result in a 45% increase to Send, for a small village this is too high</td>
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<td>• Extra cars will block up the existing busy roads</td>
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<tbody>
<tr>
<td><strong>MM9 - Green Belt policy</strong></td>
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<tr>
<td>I <strong>object</strong> to this on the following grounds;</td>
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<tr>
<td>Any modifications to definition of Green Belt should be done following a parliamentary review.</td>
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<tr>
<th>Comment: MM2 - LPMM18/3117</th>
<th>Respondent: John Shorto 20775713</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>In particular the Local Plan is unsound because:</strong></td>
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<td>The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited</td>
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<td>Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination</td>
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<tr>
<th>Comment: MM23 - LPMM18/3116</th>
<th>Respondent: John Shorto 20775713</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>1. <strong>MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority</strong></td>
<td></td>
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<td><strong>Attached documents:</strong></td>
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</tbody>
</table>
Comment: MM27 - LPMM18/3119  Respondent: John Shorto 20775713  Agent:

1. There is too much reliance on A3 improvements and they are beyond the council’s control

Attached documents:

Comment: MM3 - LPMM18/3115  Respondent: John Shorto 20775713  Agent:

I submit the following points for inclusion in the current consultation.

The current Guildford Borough Council has failed to plan the future of Guildford town as an integral place for the young and old to live in closer harmony.

In particular I have the following four points to make about the Main Modifications (eg MM3) are:

1. MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
2. MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
3. MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

Attached documents:

Comment: MM9 - LPMM18/3118  Respondent: John Shorto 20775713  Agent:

1. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Attached documents:

Comment: MM45 - LPMM18/3196  Respondent: Peter and Christine Read 20778433  Agent:

GBC - Local Plan 2018 (LPMM18)
Ref Main Modification 45 dealing with Policy A64

We wish to OBJECT to the above modification to Local Plan 2018.

Our objections are on the following grounds:
1. Insufficient warning of proposed development.

2. Number of houses proposed (105) including possible 3 storey dwellings is far too dense for this area. It is totally out of keeping with the existing area.

3. The infrastructure in this area ie roads & sewage systems, is not adequate to support this size of development.

4. Severe damage to the Green Belt area and joining villages together resulting in loss of character.

5. Increased traffic movement on Glaziers Lane which is only a lane and includes hazardous bends and a narrow hump back bridge beside the station entrance.

6. Exceptional circumstances are claimed for this proposal but no details are given.

7. Regular bus route is a mile away and the train service is only 1/2 hourly resulting in more car travel on Glaziers Lane and need to bus pupils to the middle school.

8. No convenient shops, pubs and petrol stations with the result that the new development residents would be totally dependent on using cars.

9. Footpath is on one side only alternating along Glaziers Lane meaning that pedestrians will be forced to cross and re-cross what will be a busy road to reach buses, trains, village hall and medical centre.

We would be grateful if you would take our concerns into consideration when assessing this planning proposal.

Attached documents:

Comment: MM37 - LPMM18/3217   Respondent: Nancy and John Shafee 20778625   Agent:

Our objections to excessive building in these areas remains the same as previously stated.

We object on the following grounds:

A) Surface water is a continual problem in the area with some recent building projects being delayed due to lack of provision for disposing of excess water on site. Ripley Lane and a short section of The Street are frequently flooded and impassable during times of heavy rainfall and this can only be exacerbated by building on land near to or adjoining these roads.

B) The roads are already overcrowded at peak times. Queues build up at the intersection where East Lane, The Drift and Ockham Road South meet. Queues build up even in non-peak times at the southern end of The Street/A246 at the 'Bell & Colvill roundabout'

There is almost constant congestion joining the A3 at with 'Wisley roundabout'

NB - this can only get worse with the inclusion of additional housing at Area 35

C) There is insufficient primary schooling in the village and has been for more than 25 years. Some children have to travel more than four miles for primary schooling

There is no guarantee that local children will be allocated secondary schooling at the nearest secondary school in Effingham

D) Already it can take 3 weeks to get an appointment with a chosen GP
It would make more sense to discuss additional housing
AFTER the land has been properly surveyed and resolutions found for diverting surface water
AFTER provisions for schooling and medical needs are addressed
AFTER discussions and a workable plan addressed for infrastructure - in particular roads and drainage

Attached documents:

Comment: MM38 - LPMM18/3218 Respondent: Nancy and John Shafee 20778625 Agent:

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AFTER discussions and a workable plan addressed for infrastructure - in particular roads and drainage

Attached documents:

Comment: MM2 - LPMM18/3253  Respondent: J Font Friede 20778817  Agent:

Dear Inspector, please re-open the examination and amend the Plan to take account of the new lower figures.

GRA’s adviser, a leading national expert, has shown Guildford can achieve ambitious economic growth with an extra 360 homes a year. This is still a big number, recognising we need homes, but is much more realistic than the 672 extra homes a year currently proposed in the Draft Plan which would lead to excessive loss of countryside, congestion and town cramming.
The new figure of 360 homes means development in the Green Belt on the scale proposed in the Plan can no longer be justified. The new lower figure would also make it more achievable to bring forward well-planned, sensitively-designed housing in the town centre in a timely way.

Attached documents:

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Comment: MM9 - LPMM18/3254  Respondent: Tony Rogers 20778881  Agent:

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] and am extremely concerned about plans to move the green belt boundary which adjoins my property as it would have an immediate detrimental effect on the amenity, view and character of the area.

A local house developer has already cleared a plot immediately opposite my property, having cut down several mature trees, and it is likely that when, under proposed plans, it becomes developable land the property, which adjoins the village green, will be denuded of all existing hedges, trees and natural vegetation, thereby destroying a wonderful natural environment and a lovely view.

Attached documents:

---

Comment: MM51 - LPMM18/3266  Respondent: Landowner Pear Tree Cottage 20782849  Agent: Penningtons Manches LLP (Tim Johnson)

Representation to Emerging Local Plan Main Modifications

1. This representation is submitted on behalf of our client the owner of Pear Tree Cottage and the land to the west and north of Pear Tree Cottage (such land referred to in this representation as the "Site").

2. This representation is in support of our client's objection to the modification proposed by Guildford Borough Council ("GBC") to the Submission Local Plan to amend the Green Belt boundary which under the Submission Local Plan runs along the western boundary of the Site (the "Submission Plan Green Belt Boundary"). The amended boundary is set out in the Proposals Map for West Horsley (see page 84) of the Schedule of Proposed Main Modifications dated 11 September 2018 (the "Amended Green Belt Boundary").

3. A site plan of the land at Pear Tree Cottage (shown edged blue) and the land adjoining (shown edged red) can be found at Annex 1.

4. Aerial and other photographs of the relevant boundaries of the Site can be found at Annex 2 (P1 to P16). The photographs show the boundaries as follows (letters taken from Map1):

   P1 & P2: H to A;
   P3 to P10 : A to 6;
   P11: Part of C to D;
   P12 to P15: E to F;
   P16: I.

5. Copies of emails referred to in this representation and others related to those emails can be found at Annex 3 (page numbering referred to below is to the handwritten page number on the top right of each page).
Summary of Basis of Objection to the Modification

6. In summary, the proposed modification should be rejected by the Inspector because:
   • the Amended Green Belt Boundary proposed by GBC is not compliant with the relevant provisions of the National Planning Policy Framework ("NPPF");
   • the reasons given for the modification are not supported by any proper evidence or planning basis and in fact conflict with the evidence base prepared by GBC;
   • the modification reduces the supply of land immediately available for development in circumstances where there is an existing deficit of housing supply in the borough and a need for GBC to provide additional housing in the first five years of the plan period;
   • the modification is not the result of main modification resulting from the Local Plan Examination Hearings or needed to make the plan sound but comprises an additional change to the Submission Local Plan, GBC do not have the power to make such a change at this stage of the Local Plan process.

Site and Surroundings

7. Our client is partner in a City law firm, purchased Pear Tree Cottage and the Site in 1994 and is very familiar with the surrounding area and West Horsey.
8. Pear Tree Cottage, is located to the west of Silkmore Lane from which it gains access, it comprises a pair of 19th century cottages that were converted into one dwelling in the 1960s and heavily extended after the conversion. The house is not a statutorily listed building and the residential property and its garden is currently within the settlement of West Horsley and is within the Green Belt.
9. Prior to purchase by the then owners of Pear Tree Cottage in May 1985, the Site was agricultural land. The Site was purchased in order to extend the garden of Pear Tree Cottage. The Site now forms part of that garden.
10. The Site is bounded by a tree belt to the south, hedgerow to the north and fencing and hedgerow sitting on a pronounced mound to the west. There is no physical demarcation of approximately 40% of what was previously the eastern boundary of the Site as this is part of the direct rear garden of Pear Tree Cottage. The remaining eastern boundary runs along the rear boundary of one residential property on Silkmore Lane and a paddock belonging to that property and is demarked by fencing and hedgerow and a number of posts (see paragraphs 31 and 32).
11. The Site and Pear Tree Cottage were designated as falling within the Green Belt under the 1987 Local Plan. The wider settlement of West Horsley is "washed over" by the Green Belt.

Inclusion of the Site in the emerging Local Plan

12. The Site was part of a much larger area of land that was identified as a proposed allocation for the development of 185 houses in the draft Local Plan (2014). GBC reconsidered that area of land following consultation of the draft plan and the site allocation was removed from the Local Plan in 2016.
13. The Site along with 4 other residential properties was identified as having development potential by GBC in its Land Availability Assessment report dated October 2017 ("LAA 2017") (see Appendix 2 page 283 site reference no 2026 of the LAA 2017). Appendix B of this report identifies the Site as being a "realistic candidate for development" for 20 homes in the 6-10 year period. The assessment of the Site concludes that the Green Belt and Countryside Study (GBCS) identifies that this land to be inset from the Green Belt.
14. The Submission Local Plan proposed the insetting of West Horsley from the Green Belt with the new Green Belt boundary insetting the settlement, existing properties on Silkmore Lane and the Site. This was accompanied by a detailed Sustainability Appraisal (June 2016) which considered the hierarchy of potential development sites, alternatives and the detailed reasoning for (in this instance) the removal of the site from the Green Belt.
15. The LAA Addendum published in September 2018 deletes this Site stating: "Site no longer inset from Green Belt due to boundary amendment following Local Plan hearing sessions".
Green Belt Review

16. The Site falls within a large parcel of land identified as "D6" Guildford Borough Green Belt and Countryside Study ("GBCS") prepared by Pegasus Planning Group ("PPG"). Appendix 1 of Volume 1 of the GBCS identifies the Site as part of a larger land area to the west of West Horsley as a "Potential Development Area surrounding Villages".

17. In the Volume II, the wider Parcel D6 is given an overall score of 4 for furthering the purposes of Green Belt policy on the basis that it serves purposes 1 — 4 of the Green Belt and is therefore considered to be of high sensitivity. Volume III goes on to identify the Site as part of Potential Development Area C in West Horsley (South) which includes land to the west up to Ripley Lane. The assessment sets out that:

"D6-C is surrounded by defensible boundaries including treecover following the railway line to the north, hedgerows and garden boundaries following Silkmore Lane and Pincott Lane to the east and south, and hedgerows bordering Ripley Lane to the west of the PDA. The PDA is generally contained by a local undulation, hedgerows and railway infrastructure."

18. Volume VI of the GBCS considers the insetting of Villages and defensible boundaries and identities the area of land including the Site as Area 1 C, which is identified for low density development. The GBCS identifies the defensible boundary in this location to be the "Hedgerows and fencelines located to west of Silkmore Lane" and the boundary is as illustrated in the Submission Local Plan.

19. The Site is small part of Area 1 C. Given this, and the fact that from the ground the Site appears to fall within the village settlement boundary, our client thought it helpful for PPG to give an opinion of the Site's (as opposed to D6-C generally) contribution to the Green Belt. PPG confirmed that it was prepared to give such an opinion subject to GBC's consent. Our client contacted GBC by email on 28 September 2018 requesting consent and clarifying that he would pay PPG's fees for the exercise stating:

"It seems uncontroversial that the inspector should have all relevant evidence before him in order to make an informed decision. Having Pegasus Planning Group update the study ensures continuity in approach which would be clearly helpful'.

GBC responded to our clients request on 27 September stating:

"the Council is satisfied with the proposed amendment so will not service this request'.

20. It would appear highly likely that (using the methodology employed by PPG in the GBCS) if assessed on its own, the Site would be deemed to be low sensitivity Green Belt. Clearly, this issue could have be definitively determined had GBC consented to PPG giving an opinion on this point.

Background to the Main Modification

21. It is clear from the emails provided by GBC to our client on 23 October 2018 (see Annex 3) that the proposed amendment is the result of GBC accommodating the objection of West Horsley Parish Council ("WHPC") that the Submission Plan Green Belt Boundary is "non defensible" on the basis that it does not meet "some of the criteria" set out in paragraph 85 of the National Planning Policy Framework ("NPPF"). Those emails also show that WHPC's objection is based solely on final bullet point of paragraph 85 of the NPPF 2012 which states:

"85. When defining boundaries, local planning authorities should:...
• define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

That is, the proposed modification is a result of WHPC's view that the Submission Plan Green Belt Boundary would not, in the absence of readily recognisable permanent physical features, be defensible.

22. The Inspector is aware of the representations made by WHPC related to the emerging and Submission Local Plan but to briefly recap WHCP submitted representations to the Regulation 19 consultation in July 2016 objecting to:
proposals for new Green Belt boundaries and insetting of villages from the Green Belt;
• OAN and housing targets;
• various proposed allocation.

23. WHPC made further representations in July 2017, these repeated the objections made in 2016.

24. At paragraph 3.29 of these representations WHPC (through their agent) state:

"the proposed defensible Green Belt boundaries are contested, particularly west of the properties in Silkmore Road, where the proposed boundary follows a post and rail fence in poor condition that would partly enclose an area of open fields behind the existing houses (boundary 3M on the "Defensible Boundaries map of Volume IV of the Green Belt Study"). and "The insetting methodology is not consistent or justified and appears to be based on allowing scope for future development sites rather than a proper assessment of the contribution of a settlement to the Green Belt'.

25. It should be noted that the June 2016 Sustainability Appraisal which accompanied the Submission Local Plan did carry out a detailed assessment of the changes to the Green Belt boundaries including removing the Site from the Green Belt.

26. The proposed Green Belt boundaries were also an issue on the West Horsley Neighbourhood Plan. The examiner of the plan noted:

"I recommend that at an appropriate point in the supporting material to policies WH2 and WH3, a clear and explicit statement be made as to the way the Plan deals with the question of Green Belt/settlement insets. If the intention is, as is stated elsewhere, to achieve alignment with the Submission Local Plan, the Policies Map should be redrawn accordingly. If, on the other hand, the WHNP is proposing to depart from the inset boundaries as shown on the Submission Local Plan, the supporting material should draw attention to the detailed differences and contain an explanation."

27. As a preliminary point, from the emails of Laura Howard of 16 July 2018 (page 33) and Councillor Jenny Wicks of 18 July 2018 (page 31) it is clear that the Amended Green Belt Boundary was proposed by GBC at a meeting with WHPC on 16 July 2018 to finalise the West Horsley Neighbourhood Plan. It would however appear that this decision had been made before that meeting, see the email from Councillor Jenny Wicks to a redacted recipient of 12 July at page 35.

28. Under the NPPF 2012 a neighbourhood plan cannot be the vehicle for changes to Green Belt boundaries which is not the case with the NPPF 2018. The relevant NPPF for the purposes of this examination of the Submission Local Plan is the NPPF 2012. Irrespective of that, it would be wrong for a local plan to be amended during examination to take account of a yet to be finalised neighbourhood plan or arguably a neighbourhood plan that has been successful at referendum. A neighbourhood plan must be in general conformity with the strategic policies of the local plan and contribute to the achievement of sustainable development (two of the basic conditions set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990).

A number of points arise from this:

• there is not any equivalent provision for a local plan to be in general conformity with a neighbourhood plan;
• the June 2016 Sustainability Appraisal submitted with the Submission Local Plan provides detailed reasoning for the removal of the Site (amongst other land) from the Green Belt, there is no such reasoning in the WHPC neighbourhood plan;
• there has been no equivalent assessment of the proposed GBC changes to the Green Belt boundary affecting the Site to that set out in the June 2016 Sustainability Appraisal. With the importance given to Green Belt boundaries in the NPPF 2012 (and NPPF 2018) such an assessment needs to be carried out (see also below);
• it is unclear why, from a planning policy perspective why GBC felt compelled to make the modification given the Examiner of the West Horsley Neighbourhood Plan placed the burden on WHPC to explain its position on the boundary and as is clear from Laura Howard's email of 16 June 2018 (page 31), GBC considered that WHPC's proposal as to where the boundary should run "cannot be justified". Nothing has changed since.
Defensible Boundaries

Submission Local Plan Green Belt Boundary

29. It is not difficult to understand why PPG concluded that the defensible Green Belt boundary for this part of the West Horsley is the Submission Plan Green Belt Boundary. As can be seen from the aerial photograph (Annex 2 Map 1) and the photographs from the ground (Annex 2 P3 to P10), the boundary runs in a continuous line from the bottom of the gardens of the houses at the northern end of Silkmore Lane to the south western corner of the Site. The boundary is comprised of rail and post fencing and hedgerow and sits on a pronounced mound which is the result of continued ploughing of the agricultural land that sits on the western side of the boundary. The boundary visibly and clearly demarks land of different uses and character (garden on one side and agricultural on the other) and is also clearly readily recognisable from a distance.

WHPC Proposed Boundary

30. In her email of 30 July 2018 to Councillor Paul Spooner (page 1), Councillor Jenny Wicks notes:

"The parish council’s main concern is that moving the boundary to a post and rail fence (from a dilapidated post and rail fence) isn’t a defensible boundary as required by the NPPF. Post and rail fences, unless meticulously maintained, might last 10 years, but are not a long lasting features like the end-of garden line suggested by the parish council which is clearly defined and long lasting”.

This misunderstands the position on the ground as follows:
• it can be seen from photographs P3 to P10 that the Submission Plan Green Belt Boundary (A to B on Map 1) is not purely demarked by a post and rail fence but also by hedgerow, there is a clear difference between the height and visual character and the use of the land either side of the boundary; the post and rail fence is not dilapidated as claimed, see the photographs referred to above. The fencing was in place before our client bought the property 24 years ago and has been repaired 4 to 5 times during his ownership;
• the end-of garden line proposed by WHPC (E to F on Map 1) is demarked in a number of places by post and rail fencing alone and is much less visually distinctive than the line of the Submission Plan Green Belt Boundary (see P12 to P15);
• the boundary proposed by WHPC cuts though the main rear garden of Pear Tree Cottage (C to D on Map 1) and consequently a very significant position of the boundary has no physical demarcation at all (see photograph P11);
• in addition to the rear garden of Pear Tree Cottage, there are various other points along the boundary where there is no physical demarcation — for example the northern boundary of the paddock adjoining Silkmore (point I on Map 1, see photograph P16)
• if WHPC’s approach to where the boundary should run was properly applied it would run in the position of the Submission Plan Green Belt Boundary — WHPC has selectively ignored that the Site was bought to extend and visually and functionally forms part of the garden of Pear Tree Cottage (see above).

Amended Green Belt Boundary

31. The aerial photograph (Map 1 of Annex 2) shows the line of the Amended Green Belt Boundary. The boundary has different physical characteristics across its length and these are indicated on the map by the lines running from letters B-C, C-D, D-E and E-F. The section of the boundary running between B and C is demarked by low-level hedgerow. There is no physical demarcation of the boundary between C and D (other than a short section of fencing and shrubs in the southern part of the boundary) — rather the boundary runs thought the main rear garden of Pear Tree Cottage (see photograph P11). The boundary between D-E is demarked by post and rail fencing (in poor repair) and hedgerow. The demarcation of the boundary between points E-F is mixed. it is in part demarked by post and rail fencing (some in good and some in a poor state of repair) in other parts there is no demarcation (the fencing was removed to accommodate a wedding reception held and Silkmore and not currently reinstated) and in another by a series of posts (see photographs P12 to P15).

32. It appears to our client that GBC may not be aware of the current physical characteristics of the Amended Green Belt
Boundary (although see the email from Laura Howard of GBC Planning Services to Councillor Paul Spooner dated 16 July 2018 at page 33) and has invited it to attend a site meeting in order that this can be properly established and agreed in order to avoid the Inspector being presented with conflicting views on this point. GBC declined to attend such a meeting.

33. The Amended Green Belt Boundary is not compliant with the relevant provisions of the NPPF and GBC appear to be aware of this. In her email of 16 July 2018 to the leader of GBC and copied to the head of GBC’s planning team, the Principal Planning Officer of GBC states:

"Just to let you know that Dan and Daniel met with West Horsley PC regarding their Neighbourhood Plan and the implications to changing the GB boundary. They are not happy with our proposed boundary regarding the land behind Silkmore Lane stating that it is still not defensible.

Of the three potential boundaries— the previous insert boundary [the Submission Plan Green Belt Boundary- our clarification] is the most easily recognisable. Part of it does run down a post and rail fence however this is acknowledged in the GBCS but there are no other better alternatives as the next boundary is Ripley Lane which is some distance away. Our proposal from last week is then the next best option although has its issues — as I came to you with regarding the little bit that doesn’t following anything to the south. I should point out that the northern part of this boundary also follows a post and rail fence albeit one closer to the built up edge (so is no more or less defensible that the previous proposal in this stretch of the boundary). They are still pushing for those two fields to be removed (and following the 2003 settlement boundary) -this would follow no defensible features along the northern section and goes into what appears to be a garden, it then follows a fenceline.

I understand they are intending to follow this up with me. What would you like the approach to be? There are three options. There is their stated preference which cannot be justified. There is our proposal from last week [the Amended Green Belt Boundary —our clarification] which still causes some problems or there is the option to revert to the previous boundary as they are not satisfied with the alternative?"

34. Paragraph 84 of the NPPF 2012 states:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

35. Paragraph 85 of the NPPF 2012 sets out that when defining boundaries local planning authorities should:

• ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
• not include land which is unnecessary to keep permanently open;
• where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
• make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;

• satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

36. Paragraph 158 of the NPPF 2012 sets out that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area”.

37. The Submission Local Plan Green Belt Boundary was subject to a detailed sustainability appraisal that took the requirements of paragraph 84 of the NPPL 2012 into account. No such appraisal has been carried out with respect to the Amended Green Belt Boundary.
38. The 2018 Sustainability Appraisal that accompanied the proposed main modifications refers to the change to the Green Belt boundary affecting the Site (at paragraph 9.11.3 under 48 (Policies Map)) but effectively only repeats the statement in the LAA Addendum (September 2018) without any detailed consideration regarding the modification.

39. We note that the reference to the modification in the September 2018 Sustainability Appraisal shows that GBC consider this change of such significance as to warrant an update to the June 2016 Sustainability Appraisal. Clearly, the modification to the boundary should not be made without detailed consideration required under paragraphs 85 and 158 of the NPPF 2012. In the absence of such an assessment and taking into account the points we make in this representation concerning the physical characteristics of the boundaries, if made it would be contrary to sections 19 and 39 of the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004. The change is not supported by any substantive evidence against that set out in the June 2016 Sustainability Appraisal, simply there is no basis for it.

40. Additionally, the Amended Green Belt Boundary is not considered to be consistent with paragraph 85 of the NPPF 2012 for the following reasons:

- the amendment removes a site from the Local Plan identified for meeting future sustainable development; it is highly likely that if assessed in its own right the Site would be deemed to be low sensitivity Green Belt and consequently unnecessary to keep permanent open — any development of the Site would still be subject to the planning process generally but the lack of a proper assessment of the proposed modification should be compared with the assessment contained in the June 2016 Sustainability Appraisal mentioned above; the planning team of GBC has concluded (as is clear from the Principal Planning Officer of GBC’s email above) that the Amended Green Belt Boundary is not as defensible as the Submission Plan Green Belt Boundary; the Amended Green Belt Boundary is not defined across its length by physical

41. As stated above, not only is the Amended Green Belt Boundary less defensible that the Submission Plan Green Belt Boundary (and GBC appear for the reasons above to be fully aware of this), it is inconsistent with the evidence base prepared by GBC on this subject as set out in the GBCS and the June 2018 Sustainability Appraisal. Features that are likely to be readily recognisable and likely to be permanent.

**Potential Development Site**

42. In addition to the Site being appropriate for release from the Green Belt, it also has the potential to provide additional residential development in the first five years of the plan period. As mentioned above, the Site forms part of a parcel of land that was identified as having development potential by GBC in the LAA 2017 (Appendix 2 page 283 site reference no 2026). This was only discounted due to the amendment to the proposed Green Belt boundary the Submission Local Plan, which as outlined above is considered to be unsound.

43. The LAA 2017 states that access to the Site could be from Silkmore Lane and that five private houses (Two Chimneys, Goodwood, Willowpond, Silkmore and Ashley Cottage) are included in the Site. When commenting on the availability and achievability of development, the report notes that although the primary area for development within the Site is in single ownership, the land adjoining the area (the residential properties referred to above) is not owned by the site promoter and would need to be acquired to provide access to the Site. Given the uncertainty that results from the need to acquire land in order to gain access, the Site should be considered developable within the next six to ten years. The identification of the Site as a potential development site in the LAA (2017) is supported by the landowner.

44. However, GBC failed to appreciate when considering the availability of the Site that access could be achieved thought Pear Tree Cottage and therefore the Site could be available for development at the start of the plan period.

45. Churchods Estate Agents marketed the Site to a number of developers during September and October of 2016. They received offers from five of these developers (if necessary redacted copies of these offers can be supplied). The two front running developers have a considerable amount of preparation work regarding the Site including a Highways Assessment. They have both recently stated that they wish to enter into contracts to acquire Pear Tree Cottage and the Site should the Site be removed from the Green Belt. They have stated that they are willing to submit a planning application immediately after purchase. There is therefore a high likelihood of the Site being developed and delivering housing within the borough.
46. The effect of the modification of the Green Belt boundary related to the Site is approved would be to keep the Site (which would likely be deemed to be low sensitivity Green Belt if assessed in its own right and which visibly sits within the village settlement in an otherwise well-developed area) within the Green Belt. This would reduce the land available for development in the early part of the plan period in circumstances where the Inspector had instructed GBC to make amendments to the Submission Local Plan to increase the sites available for development in the early part of the plan period. Not only would the modification appear to be contrary to the instruction of the Inspector, the modification was not requested by the Inspector but was instigated at the request of leader of GBC as evidenced in his email of 30 July 2018 in which he states: 
"They [WHPC- our clarification] can make their point during Consultation and the Inspector and Council can then take a view. Remember that the Inspector did not ask for any change — it is being done at my request"

Status of the Modification

47. The proposed modification to the Green Belt boundaries and specifically the boundary that affects our clients land is not required to make the plan sound. We cannot find and nor have we been provided with any evidence to the contrary. GBC has failed to give a proper explanation as to why the modification has been made.

48. In Samuel Smith Old Brewery (Tadcaster) v Selby DC (2015) EWCA Civ 1107 Sales LJ gave the judgement of the Court of Appeal. At paragraph 28 the various stages of plan making are described:

"The stages of the plan making process constituting respectively, the preparation of a local development document as provided for in section 19, and independent examination, as provided for in section 20, are distinct and separate from each other... They are sequential stages. The preparation comes to an end before examination begins. The former is an activity undertaken by the local planning authority, the later an activity undertaken by the inspector, albeit with the scope for him to call for further work to be done by the authority with a view to making the plan sound. As Ousley J observed [2015] PTSR 719, para 29, once the plan passes from the stage of preparation to the stage of examination, it leaves the authority's hands—save for the authority's power of withdrawal under section 23—until it able within the constraints of section 23 to adopt it."

49. Section 23(3)(b) of the Planning and Compulsory Purchase Act 2004 allows a local planning authority to make changes to a submitted local plan where main modifications have been requested by the inspector only "with the main modifications and additional modifications if the additional modifications (taken together) do not materially affect the policies that would be set out in the document if it was adopted with the main modifications but no other modifications." To seek to adopt a local plan other than in accordance with section 23(3)(b) would be contrary to section 23(4) which states that "the authority must not adopt a development plan document unless they do so in accordance with subsection (2) or (3)."

50. It is not within GBC's powers to make changes to the local plan at this stage unless such changes have been called for by the Inspector to make the plan sound or do not materially affect the local plan polices. We do not believe that the proposed change to the Green Belt boundary from those set out in the Submitted Local Plan are necessary to make the plan sound.

51. In conclusion the modification to the Green Belt boundary:
• does materially affect the local plan policies;
• is not a main modification requested by the inspector (it is clear from the emails at Annex 3 that the modification is a politically motivated request rather than one with any proper planning basis);
• that the effect of the modification if adopted would be to release a small parcel of land from the Green Belt, a site that has substantial doubt about whether it can be developed within 6-10 years (given the small size of the site it may not be economic to purchase one of the adjoining properties to give access);
• the Amended Green Belt Boundary is less defensible (in NPPF paragraph 85 terms) than the Submission Plan Green Belt Boundary);
• retaining the Submission Plan Green Belt Boundary provides a site that is available for development in the early stages of the local plan.
• the modification runs counter to the modifications to the Submission Local Plan requested by the Inspector and the local plan polices to identify more sites that can be delivered in the early part years of the local;
• the proposed modification is not a main modification, is not required to make the plan sound and materially affects policies in the local plan;
• the proposed modification is not supported by any assessment (strategic environmental or otherwise;
• the proposed modification, if adopted, will affect the soundness of the local plan.

52. We request that the proposed modification is withdrawn or if not that we have the opportunity to address these issues at a further examination hearing session. We also request that the inspector recommends that this proposed modification does not form part of the adopted plan.

See attachment for appendix.

Attached documents:  Pear Tree Cottage Redacted.pdf (5.3 MB)

Comment: MM13 - LPMM18/3270  Respondent: Paul and Patricia Hubbard 20787361  Agent:

MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

Comment: MM2 - LPMM18/3268  Respondent: Paul and Patricia Hubbard 20787361  Agent:

Please see below our objections to some of the main modifications in GBC Local Plan consultation which we like to note and record.

MM2 The housing target is wrong. We call for the hearing to be reopened so that the latest ONS figures and household projections can be taken into account

MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.

The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road Ripley which has not been properly considered.

Attached documents:

Comment: MM23 - LPMM18/3272  Respondent: Paul and Patricia Hubbard 20787361  Agent:

MM23 (Policy D1) is waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes). Strategic sites are to be exempt from design constraints

There is no evidence that recent case law such as “People over Wind” has been taken into account
Comment: MM3 - LPMM18/3273  Respondent: Paul and Patricia Hubbard 20787361  Agent:

S3 The town centre policy is inadequate and does not address the infrastructure deficit.

Comment: MM40 - LPMM18/3274  Respondent: Paul and Patricia Hubbard 20787361  Agent:

SITE SPECIFIC – A35 – Three Farms Meadows

The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR.

Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.

MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.

The biodiversity of the SNCI will be destroyed by the proposed development.

An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law.

Comment: MM41 - LPMM18/3271  Respondent: Paul and Patricia Hubbard 20787361  Agent:

MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43– Garlicks Arch; MM44 – Aldertons Farm].

There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

Comment: MM9 - LPMM18/3269  Respondent: Paul and Patricia Hubbard 20787361  Agent:

MM9 – infilling in and around villages will result in the weakening of protection of the countryside.
Comment: MM2 - LPMM18/3365  
Respondent: Stephen Marriott 20789409  
Agent: 

I would like to add my voice to those who think the local plan is unsatisfactory (unsound).

The Local Plan is unsound because:

1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited. Since I moved to Guildford in 1999 there has been no movement on developing either the area behind North Street or the large site between the Portsmouth Road and St Nick’s church

4. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination

Comment: MM3 - LPMM18/3367  
Respondent: Stephen Marriott 20789409  
Agent: 

3. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit. The only “improvement” I have seen in infrastructure has been to fill in the underpass at the bottom of the High Street and create some bus lanes, both of which have made the traffic worse. It would be better to improve cross town buses making the terminuses the park and ride stops and replace the bus station with normal bus stops for the cross town routes. Better bus routes might result in a small reduction in traffic, but otherwise it would be better for the local plan to plan for what people actually want rather than plan for what you think they should need.

Comment: MM41 - LPMM18/3366  
Respondent: Stephen Marriott 20789409  
Agent: 

2. There is too much reliance on A3 improvements and they are beyond the council’s control

Comment: MM9 - LPMM18/3368  
Respondent: Stephen Marriott 20789409  
Agent: 

5. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’. Not until the brown field sites are used and other sites considered creatively – what about building above some of the open car-parks, or creating a North-east bypass and building along the wide Woking Road?
Other Developments: We object to proposal of a travelers Site in Send Hill we have experienced the total lack of social community demonstrated when they illegally took over our village green. We object to 60 houses being built in Tannery Lane and putting the Wey Conservation area under threat by increasing the size of the Send Business Centre. Added to other proposals for our village it is too much for one little area these proposals should be shared evenly within the borough.

Attached documents:

MM27 MM41 MM42 MM48.: this proposal will impact negatively on the traffic within our village. We already have gridlocked roads when there is a problem on the A3, we have speeding cars, thundering lorries and traffic build ups. This village needs less traffic coming through it not more. In Potters Lane where we live it is a speed run for cars accessing the A3, with weekly aggressive road rage witnessed by us the residents. We do not need anymore traffic damaging our roads and putting lives at risk.

Attached documents:

We are raising objections to the local plan for Send. MM41:

The proposed building of 550 homes in this site an increase of 37% since last proposal despite 7000 objections to the lower number. These objections have been ignored. The area is subject to flooding and already a bottleneck for traffic in the mornings and evenings. Our local facilities will be overstretched if this plan was to go ahead at present they are at their maximum for the village.

MM27 MM41 MM42 MM48.: this proposal will impact negatively on the traffic within our village. We already have gridlocked roads when there is a problem on the A3, we have speeding cars, thundering lorries and traffic build ups. This village needs less traffic coming through it not more. In Potters Lane where we live it is a speed run for cars accessing the A3, with weekly aggressive road rage witnessed by us the residents. We do not need anymore traffic damaging our roads and putting lives at risk.

Attached documents:

MM42: We do not need an industrial storage facility of 14,800 sq.m in the Green Belt when Slyfield is able to accommodate this through unused space., and this proposal contradicts MM9. This largest industrial site of any village
within the borough will affect our small rural roads and lanes and increase traffic problems and nitrogen dioxide levels affecting the health of the village population.

MM27 MM41 MM42 MM48.: this proposal will impact negatively on the traffic within our village. We already have gridlocked roads when there is a problem on the A3, we have speeding cars, thundering lorries and traffic build ups. This village needs less traffic coming through it not more. In Potters Lane where we live it is a speed run for cars accessing the A3, with weekly aggressive road rage witnessed by us the residents. We do not need anymore traffic damaging our roads and putting lives at risk.

Attached documents:

Comment: MM44 - LPMM18/3405  Respondent: Brian & Helene Pavey 20789921  Agent:

MM44: This proposal has been re-inserted despite being deleted following the strong objection it received when 1st proposed. If added together with other proposals for housing it increases Sends housing build by 45%, this is not feasible with the infrastructure that the village currently exists on.

Attached documents:

Comment: MM48 - LPMM18/3408  Respondent: Brian & Helene Pavey 20789921  Agent:

MM27 MM41 MM42 MM48.: this proposal will impact negatively on the traffic within our village. We already have gridlocked roads when there is a problem on the A3, we have speeding cars, thundering lorries and traffic build ups. This village needs less traffic coming through it not more. In Potters Lane where we live it is a speed run for cars accessing the A3, with weekly aggressive road rage witnessed by us the residents. We do not need anymore traffic damaging our roads and putting lives at risk.

Attached documents:

Comment: MM9 - LPMM18/3406  Respondent: Brian & Helene Pavey 20789921  Agent:

MM9: This is proposal does not offer protection to the Green Belt despite the ‘modifications’ it simply suggests that in special circumstances Green Belt can become included in future developments if the council so wish.

Attached documents:

Comment: MM2 - LPMM18/3410  Respondent: Sheena Preston 20790049  Agent:

I am writing to ask that you re consider the Gosden Hill site as part of the Local Plan for the following reasons:
MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined,

Attached documents:

Comment: MM27 - LPMM18/3417  Respondent: Sally Anderson 20790081  Agent: MM27 MM41 MM42 and MM48 Transport Strategy

MM27 The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

Other Developments

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

Attached documents:

Comment: MM41 - LPMM18/3411  Respondent: Sally Anderson 20790081  Agent: MM27 MM41 MM42 and MM48 Transport Strategy

MM27 The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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Business Centre despite the Wey Conservation area. Added to the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

**Attached documents:**

**Comment: MM42 - LPMM18/3412  Respondent: Sally Anderson 20790081   Agent:**

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous

**Attached documents:**

**Comment: MM42 - LPMM18/3421  Respondent: Sally Anderson 20790081   Agent:**

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Attached documents:**

**Comment: MM44 - LPMM18/3414  Respondent: Sally Anderson 20790081   Agent:**

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

**Attached documents:**
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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Attached documents:

Comment: MM9 - LPMM18/3416  Respondent: Sally Anderson 20790081  Agent:

MM9 Green Belt Policy

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

Attached documents:

Comment: MM11 - LPMM18/3425  Respondent: West Horsley Parish Council 20790113  Agent: Colin Smith Planning Ltd (Colin Smith)

MM11 - Policy P4 Flood Risk and groundwater protection zones

2.25 Recommendations;
i. The modifications to parts (2) and (3) of the policy provide greater clarification to the policy, and make it more robust, and are supported.

Comments

2.26 The changes to the policy provide greater clarity and make it more robust. By preventing an increase in development vulnerability, the policy reduces the likely harmful impact of flooding.

Attached documents:

**MM12 - Policy P5 Thames Heath Basin**

2.11 **Recommendations**;

i. Retain the modification to (1);
ii. Retain the original wording to (2)(c) to ensure agreement with Natural England, not consultation;
iii. Retain the original wording to (3) to maintain the strength of the policy;
iv. Include wording that large development **must** be required to provide SANG, as well as additional green open space within the development;
v. Reference the requirement for an Appropriate Assessment within the Council’s validation checklist;
vi. Retain the original wording in paragraph 4.3.54 to **require** agreement with Natural England, **not consultation**;
vii. Retain the original wording in paragraph 4.3.60 to **require** agreement with Natural England, **not consultation**.

**Comments**

2.12 Taken overall, it appears that this policy is being weakened. There are a number of wording changes that remove the requirement for matters to be agreed with Natural England, and for the Council to only consult with them. This leaves open the opportunity for the Council to allow developments without necessarily agreeing with Natural England. There is the potential that the requirement in NPPF paragraph 176 that Special Protection Areas should be given the same protection as habitats sites could be compromised, and the policy would be in conflict with Central Government policy.

**Attached documents:**

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**MM23 - Policy D1 Place Shaping**

2.13 **Recommendations**;

i. Retain the removal of the distinction between residential developments of 25 units or more and those smaller than 25 units;

ii. In (3) as proposed to be modified, include the need for environmentally successful new places as well as economically and socially, to reflect the three objectives in paragraph 8 of the NPPF;

iii. In (4), development should **conform** to the Building for Life guidance, not just “have regard to”;

iv. Part (5) of the proposed modified policy refers to the Design Guide SPD. This does not appear to have been prepared or published to date, so reference to it should be removed. Reference should therefore be made to the existing residential Design Guide (2004) which would be the default document;

v. In part (7), include wording from the NPPF paragraph 127 “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”, and delete reference it not always being desirable for strategic allocations to reflect locally distinct patterns of development;

vi. In part (15), masterplans should be required to conform to the wording in paragraph 127 of the NPPF (above);

vii. A threshold for the size of development to be submitted to a Design Panel should be included within (18) for clarity;
Part (19) for “Villages” is supported. However, wording should be included to allow for important views of and within the village, and local landmarks to be identified within Neighbourhood Plans. Wording should also be included to ensure new developments have regard to heritage assets, and conservation area appraisals.

Comments

2.14 The increased detail of the modified policy is welcomed as it will enable a greater level of control over development in sensitive areas (such as the allocated sites in West Horsley—particularly where heritage assets are affected). It will also allow for locally important views and landmarks to be material considerations in assessing the design and layout of new developments, which will help to preserve the distinctive character of places.

2.15 There are some contradictions in the policy in relation to responding to local character and distinctiveness, but these relate to the larger strategic sites, and could be resolved through adoption of the NPPF wording. The adoption of the NPPF wording in paragraph 127 should ensure that strategic sites will not be exempt from a requirement to reflect locally distinct patterns and character of development. This could lead to individual sites creating their own identity which would be harmful and is not supported.

Attached documents:

Comment: MM24 - LPMM18/3423  Respondent: West Horsley Parish Council 20790113  Agent: Colin Smith Planning Ltd (Colin Smith)

MM24 - Policy D2 Sustainable Design, Construction and Energy

2.23 Recommendations;

i. The proposed modification (2a) requires smaller developments to provide “proportionate information”. Some clarity is to what “proportionate” means should be included;
ii. The original wording in (1)(c) to achieve the “lowest level of carbon emissions” rather than to reduce energy consumption should be retained;
iii. The original hierarchy set out in (6) should be retained;
iv. Modifications to (9) clarifies the required carbon emissions reduction target, which is supported.

Comments

2.24 The modifications to the policy provide a greater degree of clarity, but the requirements are less robust, particularly with the removal of the hierarchy in part 6. The use of the term “adequate consideration” for (C)CHP leaves the requirement open to argument.

Attached documents:


MM25 - Historic Environment

2.21 Recommendation;

i. The simplified wording of the policy is supported.
2.22 The modification is clearly in accordance with central Government policy, as it makes explicit reference to the NPPF. The NPPF provides relatively detailed policy control over developments impacting heritage assets, and therefore the modifications to the policy are supported.

Attached documents:


3.0 RESPONSE TO SITE A35 WISLEY

3.1 The Modifications Schedule sets out in section MM40 several proposed changes to site policy A35, the development of a new settlement at the former Wisley airfield site. This Parish Council’s continued objection to Site A35 is fundamental and questions why, after a major Public Inquiry, the Secretary of State’s robust refusal of planning permission and the latest housing supply trajectory with 1500 dwellings over the OAN total directed by the Examining Inspector for the Plan period, is GBC choosing to keep this site allocation within the Submission Local Plan?

Implications of planning appeal decision

3.2 The history of the former Wisley airfield planning application, the unanimous refusal of planning permission by GBC’s Planning Committee in April 2016 and the major public inquiry into a planning Appeal by Wisley Property Investments Ltd (WPIL) is comprehensively on record. The site addressed at the Appeal was marginally different from the slightly enlarged Site depicted in Policy A35, which now includes land surrounding Bridge End Farm along the southern edge of the site.

3.3 On 13th June 2018 the WPIL Appeal was refused by the Secretary of State, the announcement being made whilst the Submission Local Plan was still under Examination. In reaching their decision both the Inquiry Inspector and the Secretary of State gave:

- considerable weight to the Green Belt harm that would be caused by the proposed development
- substantial weight to the severe impact on the strategic road network
- considerable weight to the harm done to heritage assets
- significant weight to the harm done to local character and appearance
- significant weight to irreversible landscape harm, including permanent harm to views from the Surrey Hills AONB.

3.4 The Inquiry Inspector, Mr Clive Hughes, was particularly critical about the impact the development would have on the character of the local area, commenting in paragraph 20.95:

“...the overall impact would result in substantial harm to the character of the immediate area. Being sited at the very heart of Ockham parish it would, in effect, link all the surrounding hamlets. It would erode the historic pattern of development in the area to the detriment of the character of these settlements. It would fail to reflect or respect its immediate setting and I agree with the nearby residents that this impact would be catastrophic on their rural way of life.”

3.5 It was therefore surprising that just two days later, on 15th June 2018, after such a strong and clearly stated refusal of the WPIL Appeal, GBC issued a ‘Discussion Note’ declaring their intention to retain Site Policy A35 within the Submission Local Plan. The main reasons cited by GBC for this step were:

a) that Policy A35 was different to the appeal site, being a total of 95.9 hectares in size compared to the 114.7 hectares of the appeal site, although the developable land area was increased by approximately 20%
b) that the removal of this site from the Green Belt would mean Green Belt harm was no longer a relevant planning consideration
c) that Highways England and WIPL were close to finalizing an agreement over infrastructure contribution which would allow Highways England to withdraw their objection to this development they had lodged at the Public Inquiry.
3.6 Site Policy A35, like all the larger sites within the Submission Local Plan, has been subjected to Examination by Inspector J Bore. In May 2018 Colin Smith Planning submitted, on behalf of WHPC, a representation to the Examining Inspector in which Section 4 set down comments on Site Policy A35 (NB: this was several weeks before the Appeal Inquiry decision was published by the Secretary of State in mid-June).

3.7 For ease of reference a copy of Section 4 from the representation is given in Appendix 2 of these representations. The representation essentially makes the same detailed arguments made by East Horsley Parish Council (WHPC and EHPC were a Rule 6 party for the Appeal Planning Inquiry) as to why Site Policy A35 is significantly unsound. In particular the detailed planning balance demonstrates that the Exceptional Circumstances test needed to justify removing this site from the Green Belt is not met.

3.8 The Examination public Hearing for Site A35 held on 5th July 2018, heard a short address from East Horsley Parish Council’s representative which drew attention to the flaws in GBC’s argument that the site is materially different from the WPIL Appeal site. As the EHPC representative explained, the difference between the two sites only increases the overall planning harm, it does not reduce it. He further explained that the strongly negative planning balance means the Exceptional Circumstances test is not met, so the argument that Green Belt harm is irrelevant is fallacious (Note: copy of the EHPC address included at Appendix 3 of this letter).

3.9 It also became evident at the public Hearing that Highways England had still not finalized any agreement with WPIL over the road infrastructure commitments required to support site development.

3.10 Despite all of the representations and verbal arguments put to the Examination re this site, as soon as the Site Policy A35 hearing was concluded the Examining Inspector summarised his overall position on the Submission Local Plan by announcing he was not intending to recommend the removal of any sites.

Attached documents:

Comment: MM40 - LPMM18/3428  Respondent: West Horsley Parish Council 20790113  Agent: Colin Smith Planning Ltd (Colin Smith)

The case for removing Site Policy A35 from the Local Plan

3.12 The Secretary of State and the Appeal Inspector in the June 2018 letter and accompanying Inquiry Report set down a detailed review of the key planning benefits and harms by the proposed development. The modest differences between the WPIL site and Site Policy A35 have no qualitative impact on the fundamental planning issues in this respect.

3.13 WHPC together with EHPC believes the case for removing Site Policy A35 from the Submission Local Plan is now irrefutable. Both the Horsley Parish Councils highlight the following factors:

a) The Exceptional Circumstances Test for Green Belt release is not met, as set out in detail in EHPC’s Statement to the Examiner.

b) The site is fundamentally unsustainable. This is one of the three most important requirements of National Planning Policy Framework. Indeed, the updated Sustainability Appraisal provided to GBC by AECOM still shows this site as having the worst sustainability of any large site within the Submission Local Plan

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a) The Exceptional Circumstances Test for Green Belt release is not met, as set out in detail in EHPC’s Statement to the Examiner.

b) The site is fundamentally unsustainable. This is one of the three most important requirements of National Planning Policy Framework. Indeed, the updated Sustainability Appraisal provided to GBC by AECOM still shows this site as having the worst sustainability of any large site within the Submission Local Plan

c) All necessary infrastructure facilities are completely absent and will have to be provided. The provision of these substantial new infrastructure projects of different kinds, will introduce varying degrees of uncertainty over their delivery and funding. In particular it is noted that:

i. The development is effectively dependent upon the completion of a major new road improvement scheme at the busy A3/M25 junction, the timing and design of which remains uncertain
ii. The development is also dependent upon the construction of new south-facing slip roads to and from the A3 at the Burnt Common junction, whose timing and funding is also uncertain

iii. Policy A35 requires a mitigation scheme to address traffic issues at the junction of Ripley High Street and Newark Lane (leading to Woking), but no proposals have been advanced by any party to demonstrate such mitigation is achievable

iv. Major new sewage facilities will be needed at Ripley sewage works, the location of which in the Green Belt will have environmental impact and for which the timing is uncertain

v. Highways England objected to the proposed A35 Site Policy at the WPIL Appeal due to its harmful impact on the strategic road network. GBC’s Discussion Note of July 2018 signalled an agreement between WPIL and Highways England was imminent, but to date no such agreement has yet been announced.

d) Additional ecological protection may be required from that proposed by WPIL in their refused planning application. This follows from two recent landmark judgements in the Court of Justice for the EU, namely the ruling on 25th July 2018 by Advocate General Kokott concerning nitrogen deposition at protected sites, and the decision on 13th April 2018 in the matter of ‘People Over Wind’ which potentially alters the UK position in relation to appropriate assessments under the Habitats Directive. Previously-proposed SANG provisions and other ecological measures may have to be significantly enhanced at Site A35 as a result of these rulings, potentially reducing the developable area of the site still further.

e) The only reason advanced for having such an unsustainable site within the local plan is its potential contribution towards new housing supply for the borough. However, it is noted that:

i. The latest national housing projections released by ONS show major reductions in the projected housing need through to 2034, an approximate 25% reduction nationally from previous projections. Accordingly, it may well be questioned whether future housing need will actually exist to justify building new homes on the scale proposed for this new and remotely-located settlement;

ii. Total housing numbers planned in the latest version of the local plan show the Wisley site is unnecessary for meeting the overall assessed housing needs of the borough, as estimated in the new version of the Local Plan. At the Examination hearing it was GBC’s own QC who told the examiner that: “It is true we could do without 2000 homes from the totalled site allocations”

iii. Due to delays in delivering infrastructure, it is now highly unlikely that this site will make any contribution to the 5-year housing supply of the borough. This appears to have been the most important factor used by the Examiner in deciding not to remove any sites from the local plan.

Recommendation

3.14 Site Policy A35 is based upon a site which is unsustainable and totally reliant on infrastructure whose delivery is highly uncertain. The Appeal Inquiry Inspector commented that the impact of this development on local residents would be ‘catastrophic’ to their way of life, yet its contribution to borough housing targets appears unnecessary.

3.15 Accordingly, WHPC urges GBC to remove Site Policy A35 from the Local Plan.

for appendix see attachment

Attached documents:  Colin Smith Planning Redacted.pdf (363 KB)
MM6 - Affordable Homes

2.16 Recommendations;
   i. Retain the modification to ensure the thresholds comply with those in paragraph 63 of the NPPF;
   ii. Retain the modification to (4) in order to trigger the provision of off site affordable housing;
   iii. Retain the modification to paragraph 4.2.38 to make it clear that viability arguments will be an exception;
   iv. The modification to paragraph 4.2.42 is supported.

Comments

2.17 The modifications to the policy are generally supported as they bring the policy in to line with Government policy thresholds and provide a trigger to ensure that offsite affordable housing is delivered alongside market housing.

2.18 Whilst it is understood that developers are able to present viability arguments to justify reduced affordable housing provision, the clarification in paragraph 4.2.38 is welcomed to make it clear that this would be an exception.

Attached documents:

Comment: MM7 - LPMM18/3420  Respondent: West Horsley Parish Council 20790113  Agent: Colin Smith Planning Ltd (Colin Smith)

MM7 - Rural exception homes

2.19 Recommendations;
   i. Remove the wording that provides for sites for gypsies and travellers that do not meet the definition in the Planning Policy for Traveller Sites;
   ii. Retain the inclusion of a requirement to ensure that only the minimum number of market homes should be provided, subject to a viability assessment;
   iii. Remove the wording in paragraph 4.2.49 that provides for sites for gypsies and travellers that do not meet the definition in the Planning Policy for Traveller Sites;

Comments

2.20 The modifications to the above policy are supported to the extent that they allow for greater clarity around who can benefit from rural exception sites and how developers might be encouraged to provide these sites with the inclusion of limited market housing. However, the provision of rural exception sites for those falling outside the definition of gypsies and travellers should be resisted in order to avoid unnecessary and inappropriate developments.

Attached documents:

1.0 INTRODUCTION

1.1 Colin Smith Planning Ltd are instructed to submit representations on behalf of West Horsley Parish Council (WHPC) in relation to the Main Modifications (MM) published by the Council on 11.09.18.

1.2 The MM have arisen out of the Local Plan Examination hearing sessions that took place in June and July 2018, following the representations submitted at that time by interested parties and questions from the Inspector. At the close of the hearing sessions, the Inspector concluded that the plan could be found sound subject to main modifications being made.

1.3 The representations below are focussed on those MM that relate mainly to West Horsley, but also include more generalised comments of a wider nature where necessary and appropriate.

1.4 These representations review whether the MM assist in the draft Plan meeting the tests of soundness set out in the NPPF, namely that the Plan is;
- positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;
- effective – deliverable over its period and based on effective joint working;
- consistent with national policy – able to achieve sustainable development in accordance with the Framework’s policies.

Population growth

1.5 The assumptions relating to housing growth, and therefore the amount of land to be released from the Green Belt and allocated for housing developments within and around villages, are based on published population growth figures. Further detailed representations on this issue will be submitted by others. However, the following is drawn to the Inspectors attention.

1.6 The Office for National Statistics (ONS) published the 2016-based household projections for local authorities (the ‘2016 Sub-national Household Projections’ - 2016 SNHP’) on 20 September 2018. The last set of projections (produced by the MHCLG) were the 2014-based projections (the ‘2014 SNHP’). The new projections use more recent data and a different methodology. Generally, the new set suggests slower household growth than the 2014 SNHP.

1.7 As a result of the slower population growth, the following projections can be made;
- The number of homes implied by the unadjusted 2016-based household projections is 325 homes a year (2015-34) – compared with 420 homes a year based on using the 2016 SNPP to update the 2014-based projections. This is a reduction of 23%
- The NMSS calculation of the number of homes needed to support the Inspector’s view of the rate of jobs growth is 361 homes a year – compared with 460 homes a year previously estimated. This is a reduction of 22%.
- There will be similar reductions in the GL Hearn figures, suggesting a revised estimate in the range 480-490 homes a year 2015-34, although the exact number cannot be calculated without the detailed population age profiles for the GL Hearn projections.

1.8 WHPC is fully aware of the projections and that their acceptance by the Inspector would lead to significant reductions of land due to be taken from the Green Belt.

1.9 West Horsley Parish Council therefore find this draft Guildford Borough Council Local Plan unsound in that the removal of West Horsley from the Green belt through insetting has not been justified.

1.10 West Horsley Parish Council therefore continue to OBJECT to this Local Plan and ask that the hearings are re-opened to examine fully the implications of the new housing figures.

2.0 RESPONSE TO MAIN MODIFICATIONS
2.1 Recommendations

i. Retain the revised wording to P2(1) and P2(2) to reflect the wording of the NPPF;

ii. Retain the original wording to (3) to make it clear that extensions and alterations should not be disproportionate;

iii. Retain the modifications to define the “original building”;

iv. Retain the original wording of (4) (a) and (b) to define the control over replacement buildings;

v. Replace the original wording of (4)(c) with the modified wording;

vi. Remove the following modification - “Limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”; 

vii. Remove modification (c) ii, identifying that limited infilling might be appropriate outside the listed villages;

viii. Add wording to paragraph 4.3.25 to include reference to whether the site is sustainable, has access to public transport and shops, and community facilities, and that supporting infrastructure is in place.

Comments

2.2 The proposed modification to Policy P2 (1) reflects the wording of the revised NPPF (published in July 2018) and sets out the presumption against inappropriate development. The proposed modification to Policy P2 (2) also reflects the wording of the revised NPPF and refers to the list of exceptions to inappropriate development set out in paragraph 145 of the NPPF.

2.3 Proposed modifications to parts (3) and (4) are renumbered parts (a), (b) and (c). These parts add further clarity to the definitions of the exceptions to inappropriate development. However, the original wording should be included to ensure clarity over the extent of extensions and alterations that are not inappropriate, and the limits to replacement buildings.

2.4 Part (c) defines the meaning of limited infilling. An extra element has been added to the definition setting out that “Limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.”

2.5 It is noted that West Horsley, and its identified settlement boundary, is not included within the list of settlements where limited infilling is considered to be appropriate. However, West Horsley has been included within the list of settlements where “Limited infilling may also be appropriate outside the inset settlement boundaries, as designated on the Policies Map, of the following villages where it can be demonstrated that the site should be considered to be within the village.”

2.6 The effect of this is that limited infilling is not appropriate within the settlement boundary of West Horsley (excluded from the Green Belt) but may be appropriate outside the settlement boundary of West Horsley (within the Green Belt) if it can be considered to be “within the village.”

2.7 This is illogical, and contrary to the policies of the NPPF. There is no provision within the NPPF for limited infilling outside of villages. Bullet point (e) of paragraph 145 of the NPPF simply states that one of the exceptions to inappropriate development is “limited infilling in villages”. There is nothing in the NPPF that identifies development outside villages as being an exception to inappropriate development.

2.8 The inclusion of the differentiation between some villages with a settlement boundary where limited infilling is appropriate, and those where it is not is relatively clear. However, the inclusion of villages which have a settlement boundary where limited infilling is not appropriate but might be appropriate outside the settlement boundary in the Green Belt is not. The introduction of this statement will not preserve the openness of the Green Belt and is contrary to Government policy set out in the NPPF. This will have a devastating effect on West Horsley as there are many parcels of land that could then be open for development opportunities, setting a precedent for further changes to Green Belt boundaries and resulting in significant loss of the rural and open character of the village.

Attached documents:
<table>
<thead>
<tr>
<th>Comment: Other comments - LPMM18/3427</th>
<th>Respondent: West Horsley Parish Council 20790113</th>
<th>Agent: Colin Smith Planning Ltd (Colin Smith)</th>
</tr>
</thead>
</table>

**Flaws in the Local Plan process**

3.11 WHPC, like EHPC, believes the Submission Local Plan Examination process contains a series of flaws in respect of Site Policy A35. These include:

a) The Examiner’s decision on Site Policy A35 was made within a few minutes after the closing of the public Hearing in the afternoon of 5th July 2018. The Examining Inspector could not possibly have had the time to properly assess and weigh-up all of the arguments presented. This is a clear case of pre-determination.

b) The Examiner did not recommend the removal of any sites from the Submission Local Plan. Given the large number of well-argued cases presented against the many sites located in the Green Belt, the absence of even one single site being proposed for removal implies either the Examination process in reviewing sites was little more than a token exercise having no real validity, or the benchmark level used by the Examiner for assessing the soundness of any site policy was set so high as to be effectively worthless.

c) The Examiner forbade any further written submissions from Hearing participants on Site Policy A35 following the publication of the Secretary of State’s Appeal decision, other than from GBC. In view of the importance of the Appeal decision towards assessing the soundness of Site Policy A35, WHPC believes such submissions should have been allowed.

d) GBC issued their Discussion Note on Site Policy A35 within two days of the Secretary of State refusing the WPIL Appeal. The extensive arguments made by the Appeal Inspector and the Secretary of State cannot possibly have been properly evaluated and assessed by GBC and its advisers. WHPC concludes that GBC are so determined to retain this site within the Submission Local Plan that even the reasoned arguments of the Appeal Inspector and the Secretary of State are ignored and considered to be of no consequence.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/3433</th>
<th>Respondent: Paul Kenny 20790305</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**MM27 MM41 MM42 and MM48 Transport Strategy**

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

**Other Developments**

This consultation only allows comment on main modifications and so excludes the chance to object again to 40 houses and a travellers’ site on Send Hill, 60 houses at Clock barn in Tannery Lane and a 25% increase in the size of the Send Business Centre despite the Wey Conservation area. Added to the the other housing sites and industrial space such heavy concentration in one village, which could be more evenly shared with 40, is unreasonable.

**Attached documents:**
Comment: MM41 - LPMM18/3429  Respondent: Paul Kenny 20790305  Agent:

MM41 Land at Garlicks Arch, Send Marsh, Policy A43 Increased from 400 to 550 homes of which 450 to be built in the first five years

- An increase of 37% in the number of houses proposed is excessive
- The previous 7000 objections to the previous lower number have been ignored
- It is Green Belt!!!!
- It will join up Send and Ripley and constitute over development.
- The site is subject to frequent flooding and contaminated by lead shot
- At least 800 extra cars will block up the adjacent roads at a time when traffic is already awful.
- School and medical facilities will be strained to breaking point, again at a time when these services are already stretched.

Attached documents:

Comment: MM41 - LPMM18/3434  Respondent: Paul Kenny 20790305  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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Attached documents:

Comment: MM42 - LPMM18/3430  Respondent: Paul Kenny 20790305  Agent:

MM42 Land at Burnt Common, London Road, Send, Policy A58 Increased from 7000 to a minimum of 14,800 sq m of industrial and storage

- Since being deleted from the 2014 plan this has been increased twice, doubling the area. This is ridiculous.
- It is by far the largest new industrial allocation in any village in the borough
- There is no need to put new industrial sites in the Green Belt, when Slyfield has unused capacity. There are no special circumstances so it also contradicts MM9
- The Employment Land Needs Assessment showed a reduction in demand for industrial land
- This is on top of a 25% increase at Send Business Centre, making a much bigger concentration in Send than any other village with no proven demand
- Narrow surrounding roads will be gridlocked. Nitrogen dioxide levels are already dangerous. The roads around this area are already very busy.
MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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Attached documents:

Comment: MM42 - LPMM18/3435  Respondent: Paul Kenny 20790305  Agent:

MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63 New site for 120 Homes including some self build

- This was deleted from an earlier draft because of all the objections and not re-inserted until the public examination in July
- It is a Green Belt site with no special circumstances so it also contradicts policy MM9
- It will detract from the heritage buildings at Send Marsh Green
- The additional traffic will increase pressure on the Send Crossroads
- With Garlick’s Arch (550) Clockbarn (60) Winds Ridge (40) it adds 770 houses to the 1700 currently in Send, an increase of 45%. This is too much for our infrastructure.

Attached documents:

Comment: MM44 - LPMM18/3431  Respondent: Paul Kenny 20790305  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

The traffic implications for Send of Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s added to nearby Gosden Hill and Wisley/Ockham are not adequately addressed by the A3 changes and the Clandon slip roads. GBC offer fine words but no proper assessment of the aggregate traffic impact on Send Barns Lane and Send Road as thousands more cars head to Woking every day, causing increased noise, nitrogen dioxide pollution, delays and gridlock.

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**Attached documents:**

**Comment:** MM9 - LPMM18/3432  **Respondent:** Paul Kenny 20790305  **Agent:**

**MM9 Green Belt Policy**

Although the “modifications” claim to protect the Green Belt except in very special circumstances GBC make an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.” This introduces a subjective test, considerable uncertainty and effectively negates Green Belt protection. Any land on the edge of our village could be picked off for development, an open invitation to developers and speculators at the expense of residents.

**Attached documents:**

**Comment:** MM41 - LPMM18/3441  **Respondent:** Emma Munro 20790625  **Agent:**

**RE: Objection to Local plan**

I am writing to object to the over development of Send village in the proposed Local plan.

Our family have lived in Send for over 50 years. We, along with all residents of Send and the surrounding villages, will be negatively affected by the impacts of the development on the green space, transport system and the health and education provision.

The following specific objections relate to the following proposed developments

MM41 Garlicks Arch 550 homes

MM42 Burnt Common industrial and storage

MM44 Aldertons Farm 120 homes

1. The current proposed number of new homes is across all schemes is 770 compared the current number of 1700 homes in Send. This is a 45% increase and will massively change the nature and way of life in Send beyond all recognition and it will lose its village feel. In addition the developments that are being proposed will join Send to Send Marsh and Send Marsh to Ripley resulting in one large village removing the individual character.

2. The introduction of 770 new homes will result in an addition of up to 1500 cars on the roads of Send and Ripley. There are currently major delays and traffic queues through Send, Ripley and at all junctions at both morning and evening peak times which can extend throughout the day as soon as any road works are introduced in the local area. The addition of 1500 cars will cause the local roads to gridlock and increase the risk of accidents. This in turn will reduce the numbers of cyclists and pedestrians due to the pollution and increased risks of accidents.
The proposed Industrial and storage provision at Burnt Common will necessitate a large number of HGV vehicles passing through Send and Ripley. Even if there are proposed new roads and junctions to aid in this, without legal controls in place, companies will use the smaller roads as direct routes. In the event of problems on the main road network lorries would be diverted via the smaller roads -this is becoming and more and more frequent problem as the main road networks are becoming overwhelmed.

3. The Villages Medical centre already covers the villages of Send, Ripley, Clandon and surrounding areas and it can already take over 6 days to get an appointment to see a doctor. An increase number in excess of 2000 patients would make it impossible to get an appointment and would result is people being unable to see a doctor or having to present themselves at A&E as the only way to achieve a healthcare provision. This is totally unacceptable and would put people’s health and lives at risk.

4. The nearest secondary school is becoming increasingly oversubscribed from Guildford residents, leaving a reduced number of places for residents of Send. This is leading to a situation in a couple of year’s time when there will be no places allocated to children in Send. Provision of good quality school places to meet the current population requirements has been promised for years and is yet to be delivered. The planned increase in population will only add to this. The proposed number would require a new school to be built and established prior to any development to ensure provision was in place.

5. The necessary construction and infrastructure traffic required to construct these developments will have and major and lasting effect on the village, roads, trees and surroundings with pollution and damage to the roads. Even if promises on measures to avoid impact during construction are made they will be ignored once construction starts.

Although the proposed development in Send Hill is not included in the amendments, as residents of Orchard Way we would be negatively affected by the proposed development as follows.

- The proposed number of houses on the site is inappropriate for the size of the site.
- The increased traffic from the dwellings will overwhelm the road and the associated Junctions with impact on risk of accidents and delays
- The construction traffic to build the dwellings will cause major disruption and permanent damage to the road and environment including damage to trees and hedges from the large delivery vehicles.
- There are already major problems with the main sewer drainage from properties in Orchard Way and Send Hills which will be compounded by the introduction of 40 new dwellings.
- The area identified is Green Belt and this must be maintained for future generations.
- The number of dwellings proposed would not allow space for sufficient and realistic parking allocations for a rural housing location leading to parking in Send Hill which is already a problem and further adds to delays in traffic and accident risks.
- The inclusion of Traveller pitches will have a detrimental effect on the areas for the following reasons.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

The Send Hill cannot accommodate the transport of mobiles homes.

As with all proposals within the local plan they are based on providing the best option to housing developers by providing the largest number of dwellings in one block to maximise the opportunity for their profit.

The focus and responsibility of the council must be to meet the housing need in the most sympathetic and sustainable way and ensuring the villages are not lost under new towns and all character is lost. The local plan needs to be re-drafted
under these terms and opportunity for small development identified that will fit within the villages and where the village can influence the development rather than the development have a major detrimental effect on the village.

**Attached documents:**

**Comment:** MM42 - LPMM18/3442  **Respondent:** Emma Munro 20790625  **Agent:**

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**Attached documents:**

Comment: MM44 - LPMM18/3443  Respondent: Emma Munro 20790625  Agent:  

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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM13 - LPMM18/3450</th>
<th>Respondent: John Dixey 20790945</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**Amendment MM13**

I object to this amendment because given current shopping trends and the decline in the “High Street” there is far too much allocation for retail use in the town centre. The retail allocation should be put to better use, i.e. providing sustainable housing.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/3447</th>
<th>Respondent: John Dixey 20790945</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**Specific Objections**

**Amendment MM2**

I object to an amended plan for which the housing target out of date and based on incorrect information. The latest ONS statistics show a much reduced demand for housing and this needs to be reflected in the plan and on its own removes the requirement for Guildford to meet Woking’s housing shortfall.

The council has turned its own spatial strategy on its head and instead of concentrating on Brownfield sites in Guildford Town Centre where the big landowners like Network Rail, Legal and General and Guildford Corporation would be more than happy to realise the increase the value of that a change to residential use would bring. Building in the Green Belt and rural areas should be a last resort.

The addition of another 500 houses in Send (which will be car dependent) will have a severe impact on Portsmouth Road Ripley, and the A3 and there is no indication that this has been given proper consideration.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM23 - LPMM18/3451</th>
<th>Respondent: John Dixey 20790945</th>
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</tr>
</thead>
</table>

**Amendment MM23**
I object to (Policy D1) which dilutes the requirement for the social dimensions of sustainability (e.g. walking distances and pedestrian and cycle routes) and the fact that strategic sites are to be exempt from design constraints, which I consider to be a “developers charter” and abdicates GBC’s responsibility for development control to the detriment of adjoining owners and residents.

Attached documents:

**Comment:** MM3 - LPMM18/3448  **Respondent:** John Dixey 20790945  **Agent:**

**Amendment MM3**

**Policy S3**

I object to the fact that the town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

**Comment:** MM40 - LPMM18/3455  **Respondent:** John Dixey 20790945  **Agent:**

I object to the Council unilaterally removing the Wisley Airfield Site from the Green Belt. They have no mandate from the people of Guildford and Surrey to do this.

It appears that the only reason for this dubious manoeuvre is to undermine the Secretary of State for the Environment’s decision that the Wisley Airfield development “would represent inappropriate development in the Green Belt, and should not be approved except in very special circumstances” and to try to get around the fact that the provision of housing is not an “exceptional circumstance.”

It is also illogical that GBC should take this action given that they unanimously supported the refusal of the original application, and because the conservative members stated in their election manifesto that they would not build on green belt land.

**SITE SPECIFIC – A35 – Three Farms Meadows**

I object to the amendments relating to this site as follows:

The addition of land to the south of the appeal site does not mitigate the density issue as much as it appears to on the plan as building is not permitted within a certain radius the Ockham VOR (vhf omni-directional range) air traffic control beacon).

The land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB.

In breach of case law an Appropriate Assessment and a Habitats Regulation Assessment have not been completed.

**Conclusion**

Due to the inadequacies and shortcomings listed above and the fact that so many people have been excluded from this consultation I hereby call for the examination in public be re-opened.
Comment: MM41 - LPMM18/3453  Respondent: John Dixey 20790945  Agent:

Amendment MM41

I object to the fact that the proposed Transport Strategy places far too much reliance on infrastructure improvements some of which are uncertain and all of which are beyond the council’s control and have no fixed timescale. There is already a 2 year delay on Highways England RIS scheme for J10 of the M25 and this has a direct effect on the development of Site A35 – TFM; Site A43– Garlicks Arch; and Site MM44 – Aldertons Farm].

Attached documents:

Comment: MM50 - LPMM18/3454  Respondent: John Dixey 20790945  Agent:

Amendment MM47

I object to the fact that the size of the SNCI has been drastically reduced. The whole site qualifies on ecological grounds and there is no valid justification for altering the SNCI boundary. The biodiversity of the SNCI will also be destroyed by the proposed development.

Attached documents:

Comment: MM9 - LPMM18/3449  Respondent: John Dixey 20790945  Agent:

Amendment MM9

I object to the reliance on “infilling” in and around villages, which is overdone and will result in the weakening of protection of the countryside.

Attached documents:

Comment: Other comments - LPMM18/6262  Respondent: John Dixey 20790945  Agent:

Proposed Amendments to Guildford Borough Local Plan

General Objections

I also object to the Council’s failure to communicate adequately with residents about the current amendments to the Local Plan under the guise of compliance with GDPR. All the 32,000 or so persons who responded to the plan in 2016 should have been given the opportunity respond this time and not to have done so is a clear and unilateral disenfranchisement.
Re: Comment on amendments to GBC Local Plan

In the light of the new, much lower housing and population ONS figures, I request that the Inspector re-opens the examination of the local plan, with particular attention to housing need/supply projections, and the new updated calculations provided by Neil MacDonald.

In relation to amendment:

- MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify the proposed extensive Green Belt loss.
- MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision, replacing unnecessary 40% retail expansion, with residential housing provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.
- MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year does not reflect the new ONS figures and the Government’s standard method. 630 is based on incorrect assumptions resulting in an inflated figure.
- MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained and Woking’s need figure has also reduced and has not been examined.

Comment: MM23 - LPMM18/3464  Respondent: Emma Shaw 20791073  Agent:

- MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.
- MM23 (9) Strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.
- MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character
- MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.
- MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

Comment: MM3 - LPMM18/3463  Respondent: Emma Shaw 20791073  Agent:
• MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate
garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas
where redevelopment linked to enhancement might be appropriate.

Attached documents:

Comment: MM41 - LPMM18/3468  Respondent: Matthew Ridson 20791137  Agent:

I wish to make the following objections:

MM41 Garlicks Arch: I object in the strongest possible terms to these proposals, as this woodland is an extremely
valuable local landscape feature, forming the backdrop in local views and walks, including views from our house and
garden. All summer we have watched a family of buzzards flying above the woodland. We objected to the previous
proposal for this area, and now it's even worse with many more houses. Any development here will also lead to increased
run off and potential flooding downstream - i.e. where we live. As well as being beautiful, we understand it is also Green
Belt and contains some ancient woodland, and therefore completely unsuitable for development. And the development
would also add to the local traffic congestion.

Attached documents:

Comment: MM44 - LPMM18/3470  Respondent: Matthew Ridson 20791137  Agent:

MM44 Land at Alderton's Farm: I object to this as it will increase the traffic locally, which is already far too high;
also because it is Green Belt, and because the development will detract from the buildings around Send Marsh Green.

Attached documents:

Comment: MM13 - LPMM18/3486  Respondent: Gavin Teague 20791265  Agent:

MM13: the Plan continues to ignore the excess of retail use in Guildford town centre, and the current retail allocation
could be re-allocated to sustainable housing

Attached documents:

Comment: MM2 - LPMM18/3483  Respondent: Gavin Teague 20791265  Agent:

With reference to your letter dated 7th September 2018, I write to record my objections as follows:

MM2: The objectively assessed housing need is materially wrong. The Plan takes no account of the drastic reduction in
new household formations forecast by the ONS last month, and is thus fundamentally unsound.
MM2: there should be no requirement for Guildford to take Woking’s unmet need, as this would require further green belt release

**Attached documents:**

**Comment:** MM23 - LPMM18/3487  **Respondent:** Gavin Teague 20791265  **Agent:**

MM23: Policy D1 dilutes the social dimension of the required sustainability.

**Attached documents:**

**Comment:** MM40 - LPMM18/3489  **Respondent:** Gavin Teague 20791265  **Agent:**

Site A35: I support the representation made by the Wisley Action Group (WAG)

It is essential that the the public examination of the Plan is reopened.

**Attached documents:**

**Comment:** MM41 - LPMM18/3488  **Respondent:** Gavin Teague 20791265  **Agent:**

MM41: The modelling for the Transport strategy remains inadequate, including in its complete failure to take into account the impact of a delay of at least two years in the Highways England RIS scheme

**Attached documents:**

**Comment:** MM9 - LPMM18/3485  **Respondent:** Gavin Teague 20791265  **Agent:**

MM9: infilling in and around villages appears intended deliberately to weaken protection of the countryside

**Attached documents:**

**Comment:** MM51 - LPMM18/3496  **Respondent:** Mr and Mrs R O’Gorman 20791393  **Agent:**

We are contacting you to give our firm approval of the village settlement boundary being brought back to Silkmore Lane’s defensible property boundary as per Amendment 1: Horsleys – West Horsley (South) (MM51) – map page 84.
The previous proposed boundary was indefensible and therefore not a valid argument to bring greenbelt land into the village settlement area.

Attached documents:

Comment: MM27 - LPMM18/3542  Respondent: Clive Stafford 20793121  Agent:

MM27, MM41, MM42 and MM48

- I strongly wish to object to this application.
- As with the critical points I have raised above, the traffic implications are not adequately addressed. The area is already over subscribed, and by putting this proposal forward, just highlights the lack of consideration and research conducted. You Are diverting and huge percentage increase of traffic, past a Primary School?

Attached documents:

Comment: MM41 - LPMM18/3524  Respondent: Clive Stafford 20793121  Agent:

MM41, Policy A43

- I strongly wish to object to this application.
- The current area is already at breaking point, with excessive traffic and pressure on local amenities.
- The noise and disturbance to residents is going to be unbearable
- Adjoining and nearby properties will be overlooked
- Additional properties result in considerable noise levels
- The percentage increase of proposed new houses is excessive
- It is important to consider both cumulative impact and escalation of impact if this proposal was to go ahead
- Huge number of previous objections, surely the current residence opinion to preserve the local area is important?
- Flood risks, water table will be pushed up due to natural soak aways being removed
- This land is classified as Green Belt.
- Local amenities have been taken away, there is no provision for additional/larger local amenities
- Pollution levels will rise dramatically. And the proposed thoroughfare is past a primary school. This is a Health & Safety risk.

Attached documents:

Comment: MM41 - LPMM18/3547  Respondent: Clive Stafford 20793121  Agent:

MM27, MM41, MM42 and MM48

- I strongly wish to object to this application.
- As with the critical points I have raised above, the traffic implications are not adequately addressed. The area is already over subscribed, and by putting this proposal forward, just highlights the lack of consideration and research conducted. You Are diverting and huge percentage increase of traffic, past a Primary School?
MM42, Policy A58

• I strongly wish to object to this application.
• Increased amount of Industry and storage, my concerns reflect as above and below.

Attached documents:

Comment: MM42 - LPMM18/3548  Respondent: Clive Stafford 20793121  Agent:

MM27, MM41, MM42 and MM48

• I strongly wish to object to this application.
• As with the critical points I have raised above, the traffic implications are not adequately addressed. The area is already over subscribed, and by putting this proposal forward, just highlights the lack of consideration and research conducted. You Are diverting and huge percentage increase of traffic, past a Primary School?

Attached documents:

Comment: MM44 - LPMM18/3528  Respondent: Clive Stafford 20793121  Agent:

MM44, Policy A63

• I strongly wish to object to this application.
• This land is classified as Green Belt, why is this even being considered?
• Residents already experience considerable disruption from traffic.
• This area around the M25 & A3 is chaotic & the best of times, when there is a an accident on the M25/A3 the whole Send, Ripley, West Clandon, Woking routes are grid locked.

Attached documents:

Comment: MM48 - LPMM18/3543  Respondent: Clive Stafford 20793121  Agent:

MM27, MM41, MM42 and MM48

• I strongly wish to object to this application.
• As with the critical points I have raised above, the traffic implications are not adequately addressed. The area is already over subscribed, and by putting this proposal forward, just highlights the lack of consideration and research conducted. You Are diverting and huge percentage increase of traffic, past a Primary School?

Attached documents:

Comment: MM23 - LPMM18/3526  Respondent: Mark O Mathews 20793153  Agent:

1. MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In the long term interest of the residents and visitors to this beautiful historic town, I trust you to take these matters outlined above very seriously and to do all that is within your power to review and modify the modified local plan which is seriously flawed.

Attached documents:

Comment: MM3 - LPMM18/3525  Respondent: Mark O Mathews 20793153  Agent:

I am sure that you will be familiar with the article published in this week’s addition (Fri.19th Oct 2018) of the Surrey Advertiser on page 4 under the title of ‘Flawed’ Local Plan ‘needs to be reopened’.

I am pleased that I was able to attend the public meeting put on by the Guildford Vision Group on Tuesday October16th. I was amazed to discover that despite the large number of surveys and reports that have been carried out by the council at great expense over the years, the council has clearly failed to come up with and integrated an overall plan to make use of all the power and influence that it has over large sectors of the town to use all the brown field sites within this beautiful town to enhance the environment, improve housing, organise the flow of traffic, make it more pedestrian friendly, provide more affordable housing and protect the green belt.

Being very concerned and aware of the issues that are a concern of local residents, with the help and cooperation of very knowledgeable and well informed experts, the vision group has come up with a provisional plan that is obviously very much more suitable than the local plan produced by the council, which I suspect has been influenced behind the scenes by selfish commercial interest. I have copied in below some of the key modifications that Guildford Vision group has produced in response to the modified local plan.

1. MM3 – POLICY S3. Guildford Borough Council must deliver real and ordinated results. The Town Centre must be designated a strategic site or sites
2. MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
3. MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM13 - LPMM18/3541  Respondent: Colin Carmichael 20793185  Agent:
MM13: the decline in physical retailing has not been adequately considered, in the face of the rapid growth of online shopping, which means there is too much allocation for retail in the town centre that could be better used to provide sustainable housing.

Attached documents:

Comment: MM2 - LPMM18/3538  Respondent: Colin Carmichael 20793185  Agent:

Summary

Regarding the consultation on the Main Modifications to the proposed new Local Plan:

1. I believe the examination in public should be reopened because of the huge discrepancy between the Plan and the latest ONS projections of household numbers.
2. I support the representation made by Wisley Action Group regarding Site A35 as the requirement is not necessary given the revised ONS projections of household numbers.

Household numbers

The current version of the Plan requires 12,600 houses. In September 2018 the Office of National Statistics (ONS) released new household growth projections for Guildford for the Plan period of 2015-34. The new figures reduced the projected growth in households by 40% - from 11,142 (previous plan) to 6,635, a reduction of 4,507 households. A reduction of 4,500 dwellings removes the need for at least two “strategic sites” (where the five largest sites represent 7,650 dwellings including 2,000 at Wisley Airfield and 550 at Garlick’s Arch).

Given these reduced household projections, Guildford should have no requirement to take Woking's unmet housing need (which virtually disappears under the new ONS projections); the is particularly important as it will require further release of green belt.

The latest ONS projections should be used the basis for the Local Plan otherwise it will be unsound.

Other comments on the Plan

MM2: The addition of another 500 houses in Send (which will be heavily car dependent) will have a severe impact on the Portsmouth Road, Ripley which has not been properly considered.

Attached documents:

Comment: MM40 - LPMM18/3539  Respondent: Colin Carmichael 20793185  Agent:

Site A35:

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the air traffic control beacon.
- MM47: the size of the SNCI is significantly reduced despite the whole site qualifying on ecological grounds; there is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development. An Appropriate Assessment and a Habitats Regulation Assessment have not been completed, in breach of case law.
- Strategic sites should not be exempt from design constraints.
Comment: MM41 - LPMM18/3540  Respondent: Colin Carmichael 20793185  Agent:

MM41: transport strategy relies on inadequate modelling and including the delay in Junction 10 Highways England RIS of at least two years will impact the developments that rely on this scheme (e.g. A35 Wisley Airfield, A43 Garlick’s Arch and A63 Alderton’s Farm)

Comment: MM2 - LPMM18/3544  Respondent: John Wood 20793889  Agent:

I am concerned that the revised local plan is still substantially flawed and I request that the examination of it be re-opened principally because:

1. the housing figures are no longer up to date; they do not provide a sound basis for the Plan and they do not justify such extensive Green Belt loss. There is a strong case for taking out a strategic site.
2. it is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained. Woking is proposing Green Belt development, plus Woking’s need figure has also reduced.

Comment: MM27 - LPMM18/3546  Respondent: John Wood 20793889  Agent:

1. MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

I do hope the Inspector will re-open his examination of this flawed local plan.

Comment: MM3 - LPMM18/3545  Respondent: John Wood 20793889  Agent:

1. MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way gyratory system. The hurriedly put together plan for the Town Centre is flawed in so many ways. Guildford Vision Group’s startlingly simple plan regenerates the town centre; provides thousands of homes in the Town Centre; solves the excruciatingly bad gyratory traffic problem and creates very pleasant pedestrian walkways not only in the High St and North Street but also alongside the
river. Their plan is designed to solve the traffic and other problems in Guildford for the next 50 – 100 years. The Councillors appear to be only interested in short-termism, which coincides with local elections. This is not good enough for a beautiful town like Guildford, ruined by the awful gyratory road system. GBC appear to have no credible ideas how to solve the problem.

Attached documents:

Comment: MM51 - LPMM18/3594  Respondent: John Joyce 20794209  Agent:

I totally object to the local plan for West Horsley because it has never been explained why it was necessary for the village to be taken out of Green Belt protection. Once the countryside is lost it is lost forever. We expect our local councilors to protect us from the greed of property developers.

Attached documents:

Comment: MM43 - LPMM18/3600  Respondent: Patricia Allen 20794305  Agent:

Policy A62: Hornhatch Farm, land adjoining New Road, Chilworth – proposed early housing development of 80 new homes

I wish to object to this proposal as being unsustainable for the following reasons:

- Significant impact on views from the surrounding AONB
- The site is currently in the Green Belt and outside the settlement area and should remain so to keep the land permanently open to protect the AONB/AGLV, prevent urban sprawl and further linear development, and protect the nearby wild life corridors
- Brownfield sites in the Borough should be used instead of agricultural fields in the Green Belt surrounded by the AONB, even if this means a slightly longer delivery period
- The site is near a bend and right next to the busy road junction of the A248 and B2128 which already has traffic issues with long delays and tail backs at peak times
- This will create too many extra motor vehicle movements per day and put even more pressure on the junction and New Road
- This site lacks an ideal access point for easy and safe exit and entrance particularly at peak times
- Over 40 new homes have already been built in Chilworth recently and this has meant more traffic on the A248, reduced parking areas and made it difficult to drive through the village. This development would only add to the problems.
- A gas pipeline across the land could mean significant physical constraints to the development and could reduce delivery time
- There is poor public transport due to limited train and even more limited bus services, and Chilworth train station has no parking and is just over a mile away. Shalford Station also has a limited train service and parking in Shalford is becoming a problem. It makes no sense to build where the public transport is poor and people will be reliant on their cars. This is not sustainable development.
- It would require very strong justification to go ahead with this proposal as recent figures from the Office of National Statistics are showing that the predicted Guildford Borough housing needs will be far below the Borough Council’s proposed housing targets used to prepare the new Local Plan
- If it does go ahead, I think the number of houses should be *significantly* reduced; there needs to be good screening and planting to reduce the visual impact; a round-about at Rice’s Corner is needed; there should be some rental housing included in the development as well as affordable housing

**Comment:** MM2 - LPMM18/3602  **Respondent:** Sharon Cork 20794337  **Agent:**

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

4. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.
I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

### Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

### Attached documents:

**Comment:** MM23 - LPMM18/3607  **Respondent:** Sharon Cork 20794337  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.
MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/3614  Respondent: Sharon Cork 20794337  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/3604  Respondent: Sharon Cork 20794337  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:
Comment: MM31 - LPMM18/3608  Respondent: Sharon Cork 20794337  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/3609  Respondent: Sharon Cork 20794337  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/3610  Respondent: Sharon Cork 20794337  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/3611  Respondent: Sharon Cork 20794337  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/3612  Respondent: Sharon Cork 20794337  Agent:
MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/3613 Respondent: Sharon Cork 20794337 Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/3605 Respondent: Sharon Cork 20794337 Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM51 - LPMM18/3622 Respondent: Mr & Mrs Plummer 20794529 Agent:

resident approval West Horsley (South) main modifications Sept 18 MM51/ page 84

My family and I are residents [Response has been redacted due to statement containing personal data that cannot be disclosed due to the provisions of the Data Protection Act 1998] We purchased the property in 2015 and wish to protect the unspoilt tranquillity, landscape currently cherished by the residents of Silkmore Lane the wider West Horsley community and many visitors to the area. Therefore I would like to extend my firm approval of the above modification re-establishing our village settlement boundary thus protecting us from further residential development enabling future generations of families to enjoy these unspoilt areas of natural beauty.

Attached documents:

Comment: MM2 - LPMM18/3632 Respondent: Richard and Nicola Slynn 20794657 Agent:

The current draft of the Local Plan is unsound because:

1. The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.
2. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.
MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined,

Attached documents:

Comment: MM23 - LPMM18/3637  Respondent: Richard and Nicola Slynn 20794657  Agent:

Comment: MM27 - LPMM18/3636  Respondent: Richard and Nicola Slynn 20794657  Agent:

Comment: MM3 - LPMM18/3633  Respondent: Richard and Nicola Slynn 20794657  Agent:

1. Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.
2. There is no policy dealing with urban areas beyond the town centre such as the one where we live.

Comment: MM3 - LPMM18/3635  Respondent: Richard and Nicola Slynn 20794657  Agent:
MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

Attached documents:

Comment: MM41 - LPMM18/3634  
Respondent: Richard and Nicola Slynn 20794657  
Agent:

1. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

Attached documents:

Comment: MM28 - LPMM18/3660  
Respondent: Angus McIntosh 20794881  
Agent:

It is clear the Planning Inspector needs to re-open this plan; the plan needs to be re-examined. It should not progress with a few amendments but needs far more verifiable evidence; at present it is unsound which might lead to a Judicial Review.

Here are a few examples why it should be re-considered :-

There is a “sustainable corridor” going from no-where to no-where. It does not seem to link into the current road, footpath, cycle track infrastructure and there is there a clear plan showing how this might happen, including how it links westwards with the SOLUM rail station project, and eastwards into Guildford town centre.

Attached documents:

Comment: MM3 - LPMM18/3663  
Respondent: Angus McIntosh 20794881  
Agent:
Policy 3 should have been re-written, but it is not clear this has been done, nor it reflects actual meetings held with the likes of GRA, GGG, G.Soc., GVG and others to reflect their views, as clearly requested by the Inspector – particularly now the expected housing numbers have changed.

There is no evidence that there are clear plans to identify additional site for residential development, in the centre of Guildford. If GBC can identify sites on the Green Belt for development (many without adequate transport & other infrastructure) it should ALSO identify sites in the centre of Guildford

Even currently, and if there are more residents in the central area (and even more living within the hinterland of Guildford, their main town centre), the infrastructure needs totally overhauling, and up-grading. There is almost no clear evidence :-

- there are improved flooding prevention plans,
- there will be a substantial reduction in the air pollution (one of the worst towns in Surrey),
- there are no clear improvements for pedestrian movement in the existing town centre,
- there are no proposals to reduce road accidents (one of the worst towns in Surrey),
- there is no evidence that GBC intend to reduce the traffic congestion (THE worst town in the UK). The 40 year old gyratory system is notoriously congested and highly dangerous for cyclist.

Where are extra schools, doctors surgeries and other facilities will be located.

This is written in a private capacity as a local resident since 1986

Attached documents:

Comment: Other comments - LPMM18/3661  Respondent: Angus McIntosh 20794881  Agent:

At the Planning Inquiry, Jonathan Bloor, the Inspector, clearly asked GBC (I was in the room!) to prepare a Town Centre Plan (which was not produced at the inquiry). The few pages of words submitted are NOT A PLAN. There is no empirical evidence, nor clear view as to how these words related to a verifiable plan.

Were there any meeting as requested, and where are the Agendas and Minutes from each meeting? There may have been brief short meeting, but there is no evidence any of the ideas have been used from these very knowledgeable and highly qualified organisations.

Attached documents:

Comment: MM13 - LPMM18/3701  Respondent: Colin Cross 20795169  Agent:

7.MM13 Guildfords retail needs are being greatly over-sourced in this Plan as 40,000 sq m of new certainly does not mirror current retail trends in any way and thereby misses a great opportunity for more residential development in the centre.

Attached documents:
4. Housing Numbers in relation to SHMA and the latest ONS projections need now to be totally revised and the LP must be suspended to allow for new figures to be drafted and the revised numbers to be included. This will result in a much more realistic housing need picture.

Attached documents:

8. The proposed deletion of Condition D4 is wholly unacceptable and it must be put back.

Attached documents:

3. S3 Policies for the town centre are wholly inadequate and do little to address the basic infrastructure deficit in the Plan.

Attached documents:

2. MM41 policies place too much emphasis on the A3 and other primary route improvements that are outside GBCs sphere of control. There is also too little traffic modelling to back up the chosen preferences and not enough planned to overcome the Guildford A3 and gyratory jams.

9. MM41/ Garlicks Arch (550 homes) represents a massive overdevelopment of this site and ignores the existing ancient woodland, potential wide scale flooding and traffic congestion .

Attached documents:

10. MM42 / Burnt Common Industrial Site is hugely disproportionate for this rural area and should not have been expanded beyond its original 7500 sq m.

Please note the above objections are only the primary ones and there are many smaller ones too.
<table>
<thead>
<tr>
<th>Comment: MM50 - LPMM18/3699</th>
<th>Respondent: Colin Cross 20795169</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>MM47 is an example where the SNCI at Wisley is being massively reduced without reason.</td>
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<thead>
<tr>
<th>Comment: MM9 - LPMM18/3695</th>
<th>Respondent: Colin Cross 20795169</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The LP is fundamentally unsound as a whole as it fails to correctly observe the hierarchy of the development opportunities in the borough. Urban brownfield sites have been bypassed in favour of large scale rural green belt sites, this is favoured by developers and deemed an easier option.</td>
<td></td>
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<td>5. MM9 Policy for massive development in our Greenbelt is now wholly undermined by the above and the underlying arguments for this do not represent exceptional circumstances in any way.</td>
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<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>6. MM7/9 refer to huge infill development at Ockham/ FWA which will cause untold damage to the area as a whole and represent totally disproportionate scaling and a complete lack of local infrastructure coming forward to cope with it.</td>
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<thead>
<tr>
<th>Comment: MM39 - LPMM18/3729</th>
<th>Respondent: Bridget Carter-Manning 20795873</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>I write to object to the inclusion of the field in Eashing, currently good quality arable farmland, in the modifications to the draft Local Plan for Guildford.</td>
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<tr>
<td>This site has, I understand, only come forward because of the suggestion by the Inspector considering the draft Local Plan that further housing could be accommodated here. It is now clear, from recent ONS reports, that the housing figures being demanded of Guildford are too high and need to be revised downwards, and this matter is awaiting the decision of the High Court.</td>
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<tr>
<td>Including this site before the decision of the High Court is itself unsound, as there is no reason why Guildford should be include an unsuitable site for an over-estimation of the required housing numbers.</td>
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</tbody>
</table>
Guildford has not adequately shown that brown field sites have been explored for new housing development, and the immediate need seems to be for sites within the town with good available transport links. To suggest taking good arable land within the Green Belt and AGLV, with poor or non-existent infrastructure, is irresponsible and shows a lack of understanding of custodianship of our heritage.

**Attached documents:**

**Comment: MM13 - LPMM18/3744  Respondent: Anthony Thompson 20796225  Agent:**

MM13 I object because the increase in retail figures ignores market retail trends The figures need to be reduced not increased

**Attached documents:**

**Comment: MM2 - LPMM18/3740  Respondent: Anthony Thompson 20796225  Agent:**

My comments on the main modifications are as follows

MM2 I object. The housing numbers need to be updated to take account of the latest ONS projections for population increase. Using these numbers the number of dwellings required over the Plan period would be about 6,000. Having regard to existing commitments, permissions, windfall sites etc., it is clear that the requirement can be accommodated on brownfield sites within the town without significantly encroaching on greenbelt. The development of brownfield sites within the urban area would not only save countryside from irrevocable destruction but reduce the transport problem which is exacerbated by developing housing outside the town requiring commuting to jobs and shopping in the town.

**Attached documents:**

**Comment: MM3 - LPMM18/3741  Respondent: Anthony Thompson 20796225  Agent:**

MM3 I object. The regeneration of the urban area should be achieved by developing housing in the town rather than retail for which demand is reducing not increasing

**Attached documents:**

**Comment: MM41 - LPMM18/3745  Respondent: Anthony Thompson 20796225  Agent:**

MM41 I object because there has been inadequate traffic modelling to prove how the excessive housing development outside the town can be accommodated. There is no prospect of the infrastructure coping

**Attached documents:**
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<thead>
<tr>
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<th>Agent:</th>
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<tr>
<td>MM47 I object to the amendment of the map for former Wisley Airfield SNCI because there is no justification for reducing the ecological protection</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM7 - LPMM18/3742</th>
<th>Respondent: Anthony Thompson 20796225</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>MM7 I object Rural exception housing should be affordable housing to meet local needs. Allowing developers to build market housing on those sites will open them to the argument that the affordable housing is uneconomic and they end up as large dwellings that are not meeting the intended purpose</td>
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<tr>
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<th>Respondent: Anthony Thompson 20796225</th>
<th>Agent:</th>
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<tr>
<td>MM9 I object because the stated intention of protecting the countryside is not achieved by the detailed policies proposed</td>
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<tr>
<th>Comment: MM41 - LPMM18/3758</th>
<th>Respondent: Andrew and Miriam Gilkerson 20796417</th>
<th>Agent:</th>
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<td>Whilst I commend many resident focused initiatives of GBC, the ongoing development plans for the area in which we live would be clearly detrimental.</td>
<td></td>
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<tr>
<td>The village of Send simply could not cope with the increased development planned. Already we experience significant daily traffic jams due to the link between Send and Woking and routes to the A3 / M25. We live in Burnt Common with children attending the local Send CoE Primary School. Just that short route is incredibly busy.</td>
<td></td>
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<td>Specifically, it seems the objections previously made because of increased traffic, demand on the only primary school, demand on the single medical centre and a disregard of Green Belt have been ignored. Instead the number of homes at Garlicks Arch (MM41) has further increased.</td>
<td></td>
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<tr>
<td>In addition there is no clear rationale / demand for more industrial space at Burnt Common (MM42). This plan has doubled in size when To Let signs at Slyfield and elsewhere suggests there is little need. This is in addition to 25% increase of similar purpose land at Send Business Centre.</td>
<td></td>
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| Comment: MM42 - LPMM18/3759 | Respondent: Andrew and Miriam Gilkerson 20796417 | Agent: |
Whilst I commend many resident focused initiatives of GBC, the ongoing development plans for the area in which we live would be clearly detrimental.

The village of Send simply could not cope with the increased development planned. Already we experience significant daily traffic jams due to the link between Send and Woking and routes to the A3 / M25. We live in Burnt Common with children attending the local Send CoE Primary School. Just that short route is incredibly busy.

Specifically, it seems the objections previously made because of increased traffic, demand on the only primary school, demand on the single medical centre and a disregard of Green Belt have been ignored. Instead the number of homes at Garlicks Arch (MM41) has further increased.

In addition there is no clear rationale / demand for more industrial space at Burnt Common (MM42). This plan has doubled in size when To Let signs at Slyfield and elsewhere suggests there is little need. This is in addition to 25% increase of similar purpose land at Send Business Centre.

Attached documents:

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Comment: MM9 - LPMM18/3760  
Respondent: Andrew and Miriam Gilkerson 20796417  
Agent:

MM9 Green Belt Policy - a misuse of the policy that is leading to strain on our villages, not in fact protecting the green spaces and leading to a built up, traffic congested situation.

Along with the loss of green belt land, unserviceable demand on facilities and traffic delays, it will be directly my children, and many others, that will be impacted by significant increases in Nitrogen Dioxide levels when we’re encouraging cycling or walking to school.

I urge the planning team to reconsider their assessments and the proposal that will have a significant negative impact on our village.

Attached documents:

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Comment: MM2 - LPMM18/3855  
Respondent: Sue Algeo 20797473  
Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common.
avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.
There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/3858  Respondent: Sue Algeo 20797473  Agent:

In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

(D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/3867  Respondent: Sue Algeo 20797473  Agent:

– POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:
MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

   MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

   MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

   MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

   **Attached documents:**

---

**Comment:** MM31 - LPMM18/3860  **Respondent:** Sue Algeo 20797473  **Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment:** MM32 - LPMM18/3861  **Respondent:** Sue Algeo 20797473  **Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

---

**Comment:** MM33 - LPMM18/3862  **Respondent:** Sue Algeo 20797473  **Agent:**
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/3863  Respondent: Sue Algeo 20797473  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/3864  Respondent: Sue Algeo 20797473  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

Comment: MM44 - LPMM18/3866  Respondent: Sue Algeo 20797473  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/3857  Respondent: Sue Algeo 20797473  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Comment: MM2 - LPMM18/3871  Respondent: Clare Price 20797537  Agent:

I would like to respond to the Local Plan. I have attended in the past year the two Guildford Vision Group meetings and as a resident of the Tyting Society am in receipt of information from them as part of the Guildford Residents Association.

There is a lot to cover but in essence my concerns are as follows;

MM2 - Housing is needed but why invade Green Belt. I don't believe the Plan has considered Brownfield sites, it is also apparent that the figures from the ONS have been revised which show that the 630 homes required in the area is overinflated and that 360 homes is the realistic figure, this confirmed by independent expert Neil MacDonald.

Attached documents:

Comment: MM3 - LPMM18/3874  Respondent: Clare Price 20797537  Agent:

MM3 Policy S3 - The current congestion and traffic around guildford is appalling. I now ask my daughters to walk to the bottom of the high street when picking them up from the station, as getting in and out of the station is chaotic and unsafe, with taxis and waiting cars with engines running all trying to exit promptly and 'fight' their way out onto Walnut Tree Close. Walking across Bridge Street is dangerous, with very narrow pavements. Clearly new road/pedestrian routes need to be adopted, and I support the Guildford Vision Groups proposal to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

MM3 Policy S3 - Guildford Borough Council must deliver real and coordinated results and the Town Centre must be designated a strategic site/s. Guildford has some wonderful heritage in a beautiful location, with historic high street and some attractive buildings, but much of North Street, the Friary, the bus station, which is shameful is to my mind a 'disgrace' to the town. There has been no change for 30 or more years, aside from the Friary. The Debenhams building is a 'blight' to the town full of franchise shops instore.

Attached documents:

Comment: MM43 - LPMM18/3873  Respondent: Clare Price 20797537  Agent:

MM43 Housing at Hornhatch Farm, Chilworth - As a resident of Halfpenny Lane and a frequent visitor through and to the village, I am only too aware of the serious congestion through the village and in particular up Blacksmith and Halfpenny Lane which is a 'cut through' to Guildford and onward journeys thus avoiding Shalford and the subsequent town centre oneway circuit that would have to be negotiated. The lane is quite simply chaotic and dangerous as it is. There are no speed limits. Does anyone have any idea of the speed at which cars come flying round the bends, not to mention the weekend cyclists that come flying round the bends riding far too carlessly. There is no height or width restriction on the lane, thus unsuitable lorries negotiate the lane causing mayhem. I am a horse rider and dog walker and speak from experience. I would be happy to share video evidence of the chaos that occurs. Extra housing in the village, would have serious impact on the traffic in the area, not simply from congestion but from a safety point of view and pollution.

Attached documents:

Comment: MM2 - LPMM18/3876  Respondent: John Price 20797569  Agent:
I would like to respond to the Local Plan. I have attended in the past year the two Guildford Vision Group meetings and as a resident of the Tyting Society am in receipt of information from them as part of the Guildford Residents Association.

There is a lot to cover but in essence my concerns are as follows;

MM2 - Housing is needed but why invade Green Belt. I don't believe the Plan has considered Brownfield sites, it is also apparent that the figures from the ONS have been revised which show that the 630 homes required in the area is overinflated and that 360 homes is the realistic figure, this confirmed by independent expert Neil MacDonald.

Attached documents:

Comment: MM3 - LPMM18/3878 Respondent: John Price 20797569 Agent:

MM3 Policy S3 - The current congestion and traffic around guildford is appalling. I now ask my daughters to walk to the bottom of the high street when picking them up from the station, as getting in and out of the station is chaotic and unsafe, with taxis and waiting cars with engines running all trying to exit promptly and 'fight' their way out onto Walnut Tree Close. Walking across Bridge Street is dangerous, with very narrow pavements. Clearly new road/pedestrian routes need to be adopted, and I support the Guildford Vision Groups proposal to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

MM3 Policy S3 - Guildford Borough Council must deliver real and coordinated results and the Town Centre must be designated a strategic site/s. Guildford has some wonderful heritage in a beautiful location, with historic high street and some attractive buildings, but much of North Street, the Friary, the bus station, which is shameful is to my mind a 'disgrace' to the town. There has been no change for 30 or more years, aside from the Friary. The Debenhams building is a 'blight' to the town full of franchise shops instore.

Attached documents:

Comment: MM43 - LPMM18/3877 Respondent: John Price 20797569 Agent:

MM43 Housing at Hornhatch Farm, Chilworth - As a resident of Halfpenny Lane and a frequent visitor through and to the village, I am only too aware of the serious congestion through the village and in particular up Blacksmith and Halfpenny Lane which is a 'cut through' to Guildford and onward journeys thus avoiding Shalford and the subsequent town centre oneway circuit that would have to be negotiated. The lane is quite simply chaotic and dangerous as it is. There are no speed limits. Does anyone have any idea of the speed at which cars come flying round the bends, not to mention the weekend cyclists that come flying round the bends riding far too carlessly. There is no height or width restriction on the lane, thus unsuitable lorries negotiate the lane causing mayhem. I am a horse rider and dog walker and speak from experience. I would be happy to share video evidence of the chaos that occurs. Extra housing in the village, would have serious impact on the traffic in the area, not simply from congestion but from a safety point of view and pollution.

Attached documents:

Comment: MM2 - LPMM18/3879 Respondent: Richard Horton 20797729 Agent:
I would like to respond to the Local Plan. I have attended in the past year the two Guildford Vision Group meetings and as a resident of the Tyting Society am in receipt of information from them as part of the Guildford Residents Association.

There is a lot to cover but in essence my concerns are as follows;

MM2 - Housing is needed but why invade Green Belt. I don't believe the Plan has considered Brownfield sites, it is also apparent that the figures from the ONS have been revised which show that the 630 homes required in the area is overinflated and that 360 homes is the realistic figure, this confirmed by independent expert Neil MacDonald.

Attached documents:

Comment: MM3 - LPMM18/3881  Respondent: Richard Horton 20797729  Agent:

MM3 Policy S3 - The current congestion and traffic around guildford is appalling. I now ask my daughters to walk to the bottom of the high street when picking them up from the station, as getting in and out of the station is chaotic and unsafe, with taxis and waiting cars with engines running all trying to exit promptly and 'fight' their way out onto Walnut Tree Close. Walking across Bridge Street is dangerous, with very narrow pavements. Clearly new road/pedestrian routes need to be adopted, and I support the Guildford Vision Groups proposal to deliver a safer, pedestrianised town centre with transport resilience and opened Riverside.

MM3 Policy S3 - Guildford Borough Council must deliver real and coordinated results and the Town Centre must be designated a strategic site/s. Guildford has some wonderful heritage in a beautiful location, with historic high street and some attractive buildings, but much of North Street, the Friary, the bus station, which is shameful is to my mind a 'disgrace' to the town. There has been no change for 30 or more years, aside from the Friary. The Debenhams building is a 'blight' to the town full of franchise shops instore.

Attached documents:

Comment: MM43 - LPMM18/3880  Respondent: Richard Horton 20797729  Agent:

MM43 Housing at Hornhatch Farm, Chilworth - As a resident of Halfpenny Lane and a frequent visitor through and to the village, I am only too aware of the serious congestion through the village and in particular up Blacksmith and Halfpenny Lane which is a 'cut through' to Guildford and onward journeys thus avoiding Shalford and the subsequent town centre oneway circuit that would have to be negotiated. The lane is quite simply chaotic and dangerous as it is. There are no speed limits. Does anyone have any idea of the speed at which cars come flying round the bends, not to mention the weekend cyclists that come flying round the bends riding far too carelessly. There is no height or width restriction on the lane, thus unsuitable lorries negotiate the lane causing mayhem. I am a horse rider and dog walker and speak from experience. I would be happy to share video evidence of the chaos that occurs. Extra housing in the village, would have serious impact on the traffic in the area, not simply from congestion but from a safety point of view and pollution.

Attached documents:

Comment: MM2 - LPMM18/3886  Respondent: Matthew Stork 20797825  Agent:
It appears that MM2 is out of date and the Examination should be reopened as the housing figures are no longer up to date and do not justify such extensive redevelopment. This has been supported by expert input from Neil MacDonald, who has demonstrated that 360 homes per annum would support the growth target. It may be that there are inappropriate assumptions built into the proposed number of 630 with student housing being included.

Attached documents:

Comment: MM3 - LPMM18/3887  Respondent: Matthew Stork 20797825  Agent:

Specifically, I would request that the plans for Land and Buildings at Guildford Railway station are reviewed again. At the moment, there is insufficient parking and access. The roundabout is clogged frequently and the parking on the East side of the station is often full, making transport to other centres (eg London) unappealing for those living in and around Guildford. There must be sufficient parking and road access for those in Guildford and outlying villages to get to the station;

Attached documents:

Comment: MM2 - LPMM18/3899  Respondent: John Everitt 20797921  Agent:

Please revisit the above as there is quite clearly a lesser number of houses required You will also need to review the traffic and other social needs to ensure villages such as West Clandon are not swamped in any new road schemes

Attached documents:

Comment: MM2 - LPMM18/3912  Respondent: Gai Palmer 20797985  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   2.1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2.2. There is too much reliance on A3 improvements and these are beyond the council’s control
   2.3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   2.4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   3.1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt

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3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.
4. The development of 1800 houses at Gosden Hill.
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

Problems with the West Clandon section of the A247

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.
Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**

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**Comment:** MM23 - LPMM18/3915  **Respondent:** Gai Palmer 20797985  **Agent:**

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

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**Comment:** MM23 - LPMM18/3923  **Respondent:** Gai Palmer 20797985  **Agent:**

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**
MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – **POLICY S3.** Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

MM3 – **POLICY S3.** Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – **POLICY S3.** Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

**Attached documents:**

---

**Comment: MM31 - LPMM18/3916**  
**Respondent:** Gai Palmer 20797985  
**Agent:**

MM31 on **North Street** should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for **North Street** is required.

MM31 There appears to be no allocation for an **all-direction bus interchange**.

**Attached documents:**

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**Comment: MM32 - LPMM18/3918**  
**Respondent:** Gai Palmer 20797985  
**Agent:**

MM32 A height limit for **White Lion Walk** is required.

**Attached documents:**

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**Comment: MM33 - LPMM18/3919**  
**Respondent:** Gai Palmer 20797985  
**Agent:**

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.
Comment: MM35 - LPMM18/3920  Respondent: Gai Palmer 20797985  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Comment: MM41 - LPMM18/3921  Respondent: Gai Palmer 20797985  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Comment: MM44 - LPMM18/3922  Respondent: Gai Palmer 20797985  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Comment: MM9 - LPMM18/3914  Respondent: Gai Palmer 20797985  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Comment: MM2 - LPMM18/3926  Respondent: Christopher Fuller 20801953  Agent:
Ref: Guildford Borough Council’s Modified Local Plan consultation

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   MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

   MM2 Although extra sites are required because some might not come to fruition, the **housing supply** figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

   **Attached documents:**

   **Comment:** MM23 - LPMM18/3929  **Respondent:** Christopher Fuller 20801953  **Agent:**

   MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

   MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

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   MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

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MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/3927  Respondent: Christopher Fuller 20801953  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

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MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/3930  Respondent: Christopher Fuller 20801953  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:
Comment: MM32  LPMM18/3931  Respondent: Christopher Fuller 20801953  Agent:

MM32 A height limit for **White Lion Walk** is required.

Attached documents:

Comment: MM33  LPMM18/3932  Respondent: Christopher Fuller 20801953  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at **Slyfield** and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35  LPMM18/3934  Respondent: Christopher Fuller 20801953  Agent:

MM35 **Gosden Hill Farm** should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at **Gosden Hill** to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41  LPMM18/3935  Respondent: Christopher Fuller 20801953  Agent:

MM41 **Garlick’s Arch** should be retained as Green Belt in view of the revised housing need, rather than expanded

Attached documents:

Comment: MM44  LPMM18/3936  Respondent: Christopher Fuller 20801953  Agent:

MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures

Attached documents:
Comment: MM9 - LPMM18/3928  
Respondent: Christopher Fuller 20801953  
Agent: 

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:

Comment: MM2 - LPMM18/3957  
Respondent: Allan and Margaret Sacre 20802017  
Agent: 

MM2. The examination should be re-opened because the housing figures are no longer up to date and do not provide a sound basis for the plan or justify such extensive Green Belt loss.

Attached documents:

Comment: MM2 - LPMM18/3958  
Respondent: Roger Griffiths 20802049  
Agent: 

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. I would like the Inspector to RE-EXAMINE the Local Plan because:
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.
The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing
8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:
1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

**MM2** The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

**MM2** There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

**MM2** Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

**MM2** It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

**MM2** Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

**Attached documents:**
Comment: MM23 - LPMM18/3961  Respondent: Roger Griffiths 20802049  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect **locally distinct** patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address **character** adequately.

MM23 Promotion of “**green approaches**” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the **Wey Corridor** then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A **height limit** should be introduced given the importance of the rise and fall of the downs in the urban landscape.

**Attached documents:**

---

Comment: MM23 - LPMM18/3968  Respondent: Roger Griffiths 20802049  Agent:

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

**Attached documents:**

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Comment: MM3 - LPMM18/3959  Respondent: Roger Griffiths 20802049  Agent:

MM3 In (5) new town centre development should avoid adverse **impact on surrounding residential** areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to **prevent inappropriate garden grabbing** and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. **The Guildford Vision Group’s Objections and Concerns Which I Share**

MM3 – POLICY S3.Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.
MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM31 - LPMM18/3962</th>
<th>Respondent: Roger Griffiths 20802049</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM31 on <strong>North Street</strong> should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.</td>
<td></td>
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<tr>
<td>MM31 A height limit for <strong>North Street</strong> is required.</td>
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<tr>
<td>MM31 There appears to be no allocation for an <strong>all-direction bus interchange</strong>.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM32 - LPMM18/3963</th>
<th>Respondent: Roger Griffiths 20802049</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>MM32 A height limit for <strong>White Lion Walk</strong> is required.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM33 - LPMM18/3964</th>
<th>Respondent: Roger Griffiths 20802049</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at <strong>Slyfield</strong> and green roofs for commercial buildings within the site to minimise impact on views from the AONB.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment: MM35 - LPMM18/3965</th>
<th>Respondent: Roger Griffiths 20802049</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>MM35 <strong>Gosden Hill Farm</strong> should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.</td>
<td></td>
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<tr>
<td>MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.</td>
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<tr>
<td><strong>Attached documents:</strong></td>
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</tbody>
</table>
MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/3966</th>
<th>Respondent: Roger Griffiths 20802049</th>
<th>Agent:</th>
</tr>
</thead>
</table>

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM44 - LPMM18/3967</th>
<th>Respondent: Roger Griffiths 20802049</th>
<th>Agent:</th>
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</table>

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM9 - LPMM18/3960</th>
<th>Respondent: Roger Griffiths 20802049</th>
<th>Agent:</th>
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</table>

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM27 - LPMM18/3980</th>
<th>Respondent: Catherine Louise McGowan 20802593</th>
<th>Agent:</th>
</tr>
</thead>
</table>

MM27 MM41 MM42 and MM48 Transport Strategy

The implications of the extra traffic through Send Barns Lane and Send Road have not been adequately addressed. At present, during peak times, these roads do not adequately support the volume of traffic.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM41 - LPMM18/3977</th>
<th>Respondent: Catherine Louise McGowan 20802593</th>
<th>Agent:</th>
</tr>
</thead>
</table>

MM41 Land at Garlicks Arch, Send Marsh, Policy A43
About 7000 objections from local residents have been ignored from the original proposal of 400 homes to be built. The modified proposal is now for 550 homes to be built and this increase of 37% is excessive when you consider the modified proposal is within a designated Green Belt area. Development would result in the "joining up" of the villages of Ripley and Send. As Ripley School is to close, where would 550 school places be found for children? Existing medical facilities and local roads, some of which are single lane once cars park on them, would not adequately support another 550 households (with car/s) in this area. Also, this area is prone to flooding, making the modified proposal unsuitable.

Attached documents:

**Comment:** MM41 - LPMM18/3981  **Respondent:** Catherine Louise McGowan  20802593  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The implications of the extra traffic through Send Barns Lane and Send Road have not been adequately addressed. At present, during peak times, these roads do not adequately support the volume of traffic.

Attached documents:

**Comment:** MM42 - LPMM18/3979  **Respondent:** Catherine Louise McGowan  20802593  **Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

The Employment Land Needs Assessment showed a reduction in demand for industrial land so why has the industrial and storage required doubled since the 2014 plan? There are no special circumstances for this development on Green Belt land, it contradicts Green Belt Policy MM9. Also, there is still land at Slyfield that could be used for this purpose.

Attached documents:

**Comment:** MM42 - LPMM18/3982  **Respondent:** Catherine Louise McGowan  20802593  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The implications of the extra traffic through Send Barns Lane and Send Road have not been adequately addressed. At present, during peak times, these roads do not adequately support the volume of traffic.

Attached documents:

**Comment:** MM44 - LPMM18/3984  **Respondent:** Catherine Louise McGowan  20802593  **Agent:**

**MM44 Land at Alderton's Farm, Send Marsh Road Policy A63**
This is a Green Belt site. There are no special circumstances for 120 new homes and this would contravene policy MM9. With the 120 new homes added to the other proposed new housing sites in Send, this would see an increase in housing of 45%. The existing infrastructure within Send could not support this increase.

Attached documents:

**Comment: MM48 - LPMM18/3983**  **Respondent:** Catherine Louise McGowan 20802593  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

The implications of the extra traffic through Send Barns Lane and Send Road have not been adequately addressed. At present, during peak times, these roads do not adequately support the volume of traffic.

Attached documents:

**Comment: MM9 - LPMM18/3978**  **Respondent:** Catherine Louise McGowan 20802593  **Agent:**

**MM9 Green Belt Policy**

By making an exception for "limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village", this effectively makes any land on the edge of our village open to development, which results in Green Belt protection being meaningless. This would potentially create an opportunity for developers to change the character of our village through unsuitable housing proposals designed to fill housing quotas, that may not properly take into account existing natural habitats for wildlife and the quality of life the residents currently enjoy, ultimately changing the character of our village.

Attached documents:

**Comment: Other comments - LPMM18/3985**  **Respondent:** Catherine Louise McGowan 20802593  **Agent:**

There are various other development proposals that local Send residents are not able to comment on as they are not main modifications to the Guildford Local Plan. These include 40 houses and a travellers' site on Send Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of the Send Business Centre, despite the Wey Conservation Area. As these proposals fall within Send it seems unreasonable that we cannot consider these in conjunction with the Main Modifications to the Guildford Local Plan.

The Main Modifications to the Guildford Local Plan does not address how the existing infrastructure would adequately cope with a 45% increase in houses in Send, let alone what new infrastructure would be put in place. Surely this must be considered before any further development takes place?

Attached documents:
To whom it may concern, I would like to make the following objections with regard to the local plan given that the whole thing is based on inaccurate ONS data:

5.2-1 The household projection is using out of date information! The new household projections (Sept 2018) show a substantial drop in the number of households and therefore the plan is based upon fundamentally unsound data. The same issue applies to S2-2. Given this difference the public examination must be re-opened!

S2.4 – 4 Due to the changes in the household figures…the proposed strategic sites (2) specifically those on greenbelt must be removed.

S2.5 Also the 5 new sites included in the plan (for early delivery) should be removed.

Attached documents:

MM3 S3.1 although the new plan finally includes a policy on the town centre it is too vague, rambling with no details of what is exactly proposed! This is unacceptable and looks like a last minute job!

Attached documents:

MM40 again incorrect given the new data from the ONS – the planned impact on the SNCI should be re-instated to its former size.

Attached documents:

MM9 once again this policy does not take into account the latest ONS data – 66% of the plan is on green belt! This is no longer required.

Attached documents:

Regarding the modifications of GBC Local Plan, I would like to object wholeheartedly to these modifications. Over the last few years I have repeatedly objected to the Local Plan in our area. Time and time again I have listed my objections
and am horrified that you have added to the land south of the appeal site, which will completely overlook our house and land and completely ruin our historic hamlet, turning it into a large town of ridiculous proportions. Also, a lot of this land is constrained by the VOR (air traffic control beacon) which prevents any construction within a certain radius.

Attached documents:

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**Comment:** MM2 - LPMM18/4029  **Respondent:** Mr Anthony Allen 20804897  **Agent:**

With regard to the rest of the modifications there are several points which are not acceptable. In view of the latest ONS statistics, which were released a few weeks ago, the GBC has not taken these figures into account and therefore your housing target is wrong, which means the plan is unsound. Also in MM2 - there should be no need for Guildford to take Woking’s unmet need, which would require further green belt release.

Finally, I note that Strategic sites are to be exempt from design constraints! This will result in inappropriate developments such as that proposed on Three Farm Meadows. There is also no evidence that recent case law, such as “People over Wind” has been taken into account.

For all the above reasons I am calling for the hearing to be reopened, specifically so that the latest Office of National Statistics can be used. I would also like to advise that I support the representation made by WAG (Wisley Action Group), which was written with advice from Richard Harwood QC.

Attached documents:

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**Comment:** MM41 - LPMM18/4031  **Respondent:** Mr Anthony Allen 20804897  **Agent:**

MM41 - the transport strategy modelling, which is used by your plan, is inadequate. Specifically the fact that the delay in J10 of the M25 by Highways England RIS of at least two years will impact all development that relies on this scheme.

Attached documents:

---

**Comment:** MM50 - LPMM18/4028  **Respondent:** Mr Anthony Allen 20804897  **Agent:**

Regarding MM47, the size of the SNCI is drastically reduced, which is not acceptable and there is no justification for it. It will destroy the biodiversity of this area. I also understand that an Appropriate Assessment and a Habitats Regulation Assessment have not been completed which is a breach of case law.

Attached documents:

---

**Comment:** MM9 - LPMM18/4030  **Respondent:** Mr Anthony Allen 20804897  **Agent:**

MM9 - the infilling in and around villages will result in the weakening of protection of the countryside.
Dear Sir / Madam

We have recently been informed by our local action group that we need to make any objections/comments regarding the modifications of the GBC Local Plan.

Firstly, it appears that you are no longer sending us emails, along with thousands of other local residents, due to the GDPR issue. I received around 100 emails, regarding GDPR, from other companies/organisations, and, if I no longer wished to receive their emails, I notified them to that effect. I am assuming that your GDPR email has requested everyone to opt in to continue receiving the emails, which means that the majority of people did not read your email carefully enough and, like me, did not request to continue receiving them. **Please can you make sure you add my name to continue receiving your emails from immediate effect.**

Attached documents:

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**Comment:** MM13 - LPMM18/4035  **Respondent:** TSG Consulting (Mr Mark Watson) 20805057  **Agent:**

- MM13 There is too much allocation for retail in the town centre. The evidence base on retail is out of date and current trends (e.g. online shopping) are not properly taken into account. The retail allocation could be put to better use providing sustainable housing

Attached documents:

---

**Comment:** MM2 - LPMM18/4033  **Respondent:** TSG Consulting (Mr Mark Watson) 20805057  **Agent:**

I wish to object to the main modifications proposed for the Local Plan. I also wish to point out that I have not been advised of the consultation on this matter (despite being advised previously by email). In providing my reasons, I support the representation made by WAG, written with advice from Richard Harwood QC

My reasons are as follows:

**GENERAL**

- MM2 The housing target is wrong. I call for the examination in public to be reopened so that the latest ONS figures and household projections can be taken into account
- MM2 There should be no requirement for Guildford to take Woking’s unmet need particularly as this will require further green belt release.
- The council has not properly followed its spatial strategy which requires that development takes place first in the town centre, the urban area and brownfield before moving to land in the villages or greenbelt. The addition of another 500 houses in Send (which will be car dependent) has a severe impact on Portsmouth Road, Ripley, which has not been properly considered.

Attached documents:
**Comment:** MM23 - LPMM18/4037  **Respondent:** TSG Consulting (Mr Mark Watson) 20805057  **Agent:**

- MM23 (Policy D1) waters down the requirement for the social dimension of sustainability (eg walking distances and pedestrian and cycle routes)
- Strategic sites are to be exempt from design constraints
- There is no evidence that recent case law such as “People over Wind” has been taken into account

**Attached documents:**

---

**Comment:** MM3 - LPMM18/4038  **Respondent:** TSG Consulting (Mr Mark Watson) 20805057  **Agent:**

- S3 The town centre policy is inadequate and does not address the infrastructure deficit.

**Attached documents:**

---

**Comment:** MM41 - LPMM18/4036  **Respondent:** TSG Consulting (Mr Mark Watson) 20805057  **Agent:**

- MM41 – Transport strategy relies on inadequate modelling including the delay in J10 Highways England RIS scheme of at least two years will impact all development that relies on this scheme [e.g. Site A35 – TFM; MM41 site A43 – Garlicks Arch; MM44 – Aldertons Farm].
- There is too much reliance on A3 (Guildford) improvements that are beyond the council’s control and have no fixed timescale.

**Attached documents:**

---

**Comment:** MM50 - LPMM18/4039  **Respondent:** TSG Consulting (Mr Mark Watson) 20805057  **Agent:**

- The addition of land to the south of the appeal site does not mitigate the density issue as much of the new land is constrained by the VOR
- Land to the south abuts the Ockham Conservation area and increases the visibility of the site to/from the Surrey Hill AONB
- MM47 – the size of the SNCI is drastically reduced despite the whole site qualifying on ecological grounds. There is no justification for altering the SNCI boundary.
- The biodiversity of the SNCI will be destroyed by the proposed development.
- An Appropriate Assessment and a Habitats Regulation Assessment have not been completed – in breach of case law

**Attached documents:**
Comment: MM9 - LPMM18/4034  Respondent: TSG Consulting (Mr Mark Watson) 20805057  Agent:

- MM9 – infilling in and around villages will result in the weakening of protection of the countryside

Attached documents:

Comment: MM23 - LPMM18/4086  Respondent: Gay Umney 20806273  Agent:

MM23 – Policy D1

- GBC is a major landowner in the town centre and should be required follow the same obligations imposed by the council as the planning authority on the other strategic site owners

Attached documents:

Comment: MM3 - LPMM18/4085  Respondent: Gay Umney 20806273  Agent:

General overall comment:

It seems to me to be futile discussing the future of the town centre without first sorting out the traffic problems. If we don’t address the chronic traffic jams and queues in and around the town, nobody will be prepared to come to Guildford to take the spaces in all the new proposed developments.

Detail Comments:

MM3 – Policy S3

- There need to be strategic designated sites in the Town Centre in order to achieve a coherent and coordinated development.
- It is important that rules are established to ensure the quality of developments in the Town Centre and to regulate the height of these developments.
- GBC should consider adopting the Guildford Vision Group’s proposals including the new crossing or equivalent effective alternative to deliver a safer pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM45 - LPMM18/4090  Respondent: James Bouncer 20806401  Agent:

I’m writing to object the Local Plan proposal of site - Policy A64: Land Between Glaziers Lane and Strawberry Farm, Flexford; on the basis of the following points:

This is green belt area and adjacent to an area of outstanding natural beauty. If approved its development would fundamentally alter the importance of protection of our green belt for future generations, aside from visually impacting an
area of outstanding natural beauty adjacent to it and highly visible from the top of the Hog’s Back. Responding correctly
to this proposal has been difficult when the “exceptional circumstances” as to why the green belt can be altered have not
been made available to us.

Glaziers Lane is a narrow lane with an awkwardly angled railway bridge and sharp right hand bend that compromise the
road width even further. Such a development with all the additional traffic is going to increase the risk of a serious
accident/death in the Lane. It’s important to note this is a Lane not a road, and any possible entrance exit to this site
would be unsighted by traffic approaching from the South increasing this risk significantly, especially as at peak times
people speed down the lane.

Light pollution is currently very low in Glaziers Lane this development would increase this considerably with cars at
night turning in and out of any access road, which will have a knock on impact on wildlife in the area.

Noise pollution is also low in this part of Glaziers Lane, adding 105 houses would dramatically change this in a negative
way, adding circa 200 plus cars to the area which is a significant impact.

At present have a thriving population of hedgehogs which do cross the Lane and increased traffic is highly likely to
impact them directly, whilst not on any endangered list now there is serious concern over their future as they continue to
disappear from our hedgerows. There are a good number of mature oak trees in site A64, with all of the issues over the
last couple of decades with disease we need to ensure their protection, not building here and so not impacting their
environment would be a good support.

People park in the lane especially if they have a larger number of visitors, with the current limited housing this is less of
an issue but adding in so many more houses with limited parking will result in an increase in the occasions when people
will park in Glaziers Lane and again increase the risk of accidents (as people always park as near as they can to where
they want to be) coupled with the higher traffic volumes again especially important being so near the blind approach from
the railway bridge.

The fields and land all around Normandy Village are subject to excessive water build up this will be clearly visible as we
move into winter. We are in an area of clay with a high water table, which the standing water after rain at all differing
levels reinforces. Such a large development is going to impact this and may affect the water table in a wider area putting
houses at risk of flooding? Has a survey been carried out of the lake including any wildlife it supports in the surrounding
area. We assume such a plan will result in the lake being drained for houses to be built? Please note the lake to my
knowledge has never dried out, so there is a source of water into it that will end up bubbling up somewhere else causing
risk of flooding?

There are numerous brown field sites listed on the GBC web site. Whilst recognising that for developers these are not a
cheap option’s v’s green belt land, surely repurposing brown belt land must come before the desecration of the green
belt? Perhaps developers should be forced to take on 5 houses in brown field sites for every 5 in the green belt, halving
the impact?!!

Sewage / general drainage is an issue in Glaziers Lane, is a significant issue in the Lane. Adding 105 houses will place a
massive additional strain on an already challenged sewage system (the system has already collapsed twice in the last few
years at the northern end of the Lane, and dip has started forming again recently so later this winter may see it collapsing
again). All the additional lorries over a 3 year period to build these houses will massively accelerate this issue and the
risk of damage to the road and the just renewed pavement.

Special note on the heavy lorries associated with such a development. The lorries associated with Backhurst etc are
already noticeable in that you can feel them in the house as they go by (sometimes at excessive speeds!!) The massive
increase in such large vehicles is going to further damage the road and potentially cause our structural issues to houses in
the area. Also the buses and lorries that currently come down the Lane (please note not a road) find it very difficult to
stay on their side of the Lane due to its narrowness and completely impossible to turn in and stay on the correct side of
the road, both dangerous and very unnerving as a driver going towards them.

Attached documents:
Dear Sir/Madam,

The Local Plan makes depressing reading for existing Send and Burnt Common residents and largely ignores many thousands of previous objections.

Whilst Ripley seems to have been protected from large scale development (but considered for limited ‘in-filling”), Send and Burnt Common seem to have been targeted for an unacceptable scale of development.

We have lived at this address adjacent to Burnt Common roundabout for 32 years, and even now, the level of traffic noise and exhaust gas pollution is becoming unbearable. In particular, anything that creates more heavy goods lorry traffic at this point would be a disaster for this house and all of those in the vicinity. Traffic leaving Burnt Common roundabout in the direction of Clandon Road and Portsmouth Road is at full capacity daily during peak times.

**Attached documents:**

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**In summary**, the modifications are simply too much for the village of Send and Burnt common, both of which already suffer from greatly increased traffic and congestion / pollution

-Send has already taken on many developments (Skene Close, Vision Engineering, re-building Send school, Tannery Lane, Woodhill) as part of gentle but considered ‘in-filling’

-ONS reports show that the actual levels of housing needs have been grossly over-estimated by the Council in its Local Plan

-Send residents have repeatedly been voicing their concerns in previous feedback, but these have been largely ignored

-It is not appropriate to try to ‘absorb’ unused housing capacity needs from Woking

-Noise levels are already an uncomfortable health hazard, and it has been reported that **nitrogen dioxide levels are rising, currently at a level of 5 out of a legal limit of 6 (ref: BBC Science website)**. A loss of more countryside/Green Belt would exacerbate this.

-Abandoning the new A3 slip-road (policy A43a) would save money which could be better spent on other services for existing residents, who pay high levels of Council Tax

(such measures should include traffic-calming, road repairs and noise reduction)

Many residents feel they are now being ‘punished’ for simply voicing their concerns over the years

The Wisley airfield site could perhaps be re-considered for some light industrial development, if demand can be proven, given its closer proximity to the M25/A3, Jct 10.

It is also better suited to having an appropriate traveller pitch allocation (instead of Winds Rush A44 – practically opposite the cemetery!!) as part of a mixed development.

**Attached documents:**
**Comment: MM27 - LPMM18/4153  Respondent: Nicolas and Judith Ware 20808161   Agent:**

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure

With so many recent developments (Skene Close in Send, Vision Engineering, Clockbarn/marina in Tannery Lane), the main road through Send has struggled

Having temporary lights has become a regular feature, and continues even today (4-way lights at the A247 junction to Old Woking, and along Portsmouth Road into Ripley)

Send is a VILLAGE, not a town – and the main road through Send regular gets clogged with traffic, and backs up most mornings and evenings – in both directions

The Local Plan attempts to address the issue of transport, but is inaccurate in several places (eg ‘on most local roads in urban areas and in villages, there is at least one footway, usually two’)

Other than the main routes out of the village (which are already under pressure), most roads are in fact lanes, often with no footways at all (eg Polesden Lane, parts of Vicarage Lane & Potters Lane)

Many other routes are lanes which cannot accommodate free-moving two-way traffic (Newark Lane, Burnt Common Lane, Rose Lane, Send Hill, Woodhill, Potters Lane, Church Lane, Vicarage Lane)

The existing bends around Potters Lane / Send Hill are already treacherous, with several blind corners and narrow apertures – these need attention already, not more traffic volume!

Overall, the slightest developments can create significant traffic, pollution, delays and backlogs, putting more pressure on people using ‘back roads’ (ie lanes) and clogging up the villages

**Attached documents:**

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**Comment: MM41 - LPMM18/4149  Respondent: Nicolas and Judith Ware 20808161  Agent:**

**MM41 – Garlicks Arch (policy A43)**

The scale of proposed development is massively excessive

Recent ONS estimates have down-graded the level of new homes needed in the Guildford borough, so this proposal cannot be rationally justified

The land itself is GREEN BELT, and there are no apparent ‘special conditions’ to exempt it

The land contains ancient woodland, which should be preserved. Many trees carry TPOs (preservation orders)

One key purpose of retaining GREEN BELT is to prevent urban sprawl, and development here would compromise this, essentially linking Ripley to Send/Burnt Common
The site itself has been subject to flooding in the past, and this should render the site unsuitable for development.

The extra traffic generated would be unacceptable for existing infrastructure, which is already bursting at the seams.

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further.

Having closed the primary school in Ripley, there is no tangible capacity for schooling.

It is already far too difficult to get appointments at the Send Villages Medical Centre, which seems to be already running at full capacity.

Therefore I OBJECT to this development and the proposed modification.

Attached documents:

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Comment: MM41 - LPMM18/4157  Respondent: Nicolas and Judith Ware 20808161  Agent:

**MM27 / MM41 / MM42 / MM48 – Transport Strategy**

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough.

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure.

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Attached documents:
MM42 – Burnt Common (policy A58)

This was originally proposed to be a modest development, was then increased (to a minimum figure), and has now expanded hugely to a minimum of 14,800 square feet

I do not agree with the labelling of this site as being ‘strategically’ important

It is GREEN BELT land, and I oppose the re-drawing of GREEN BELT lines simply to suit this proposal

There are no apparent ‘special circumstances’ to warrant insetting this site from the GREEN BELT

Other sites in the borough have unused capacity, and other ‘brownfield sites’ should firstly be fully considered and identified

We have already witnessed increased commercial development (Send Business Centre, Vision Engineering) in the village

There is no apparent or proven demand for extra industrial land in the village

The road infrastructure is unsuitable, as the road accessing the site is in disrepair (cracks regularly) and cannot cope with existing traffic, let alone more.

Vehicles leaving the site would have to cross onto the north-bound A3 slip road, which is fast-moving and has been the scene of many accidents in the recent past, some fatal.

The likely increase in traffic and noise would be inappropriate for a site bordering on residential areas on the roundabout

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further

The proposal to create a 4-way junction off the nearby A3 (policy A43a) is a waste of money and would only increase traffic noise and pollution through the villages

Therefore I OBJECT to this development and the proposed modification

Attached documents:

Comment: MM42 - LPMM18/4150  Respondent: Nicolas and Judith Ware 20808161  Agent:

MM27 / MM41 / MM42 / MM48 – Transport Strategy

The transport / traffic strategy confirms that cycling routes need to be vastly improved and protected, as current ‘flow’ is not good enough

Regarding road (vehicle) traffic, the Transport Strategy is not robust and not truly reflective of the needs and concerns of our highways infrastructure

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Attached documents:

Comment: MM44 - LPMM18/4151  Respondent: Nicolas and Judith Ware 20808161  Agent:

MM44 – Aldertons Farm (policy A63)

This site proposes development for building around 120 homes, but it is GREEN BELT land

No ‘special circumstances’ should apply, especially as the land has been subject to flooding and does not drain well

The likely increase in traffic would be inappropriate for a site bordering on residential areas

Levels of pollution (such as nitrogen dioxide) are already increasing, and this proposal would exacerbate matters further

The knock-on effect, in addition to other sites, would be excessive for our village, given the revised (ie lower) ONS forecasts for housing needs

Therefore I OBJECT to this development and the proposed modification

Attached documents:

Comment: MM48 - LPMM18/4155  Respondent: Nicolas and Judith Ware 20808161  Agent:

MM27 / MM41 / MM42 / MM48 – Transport Strategy

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Attached documents:

Comment: MM9 - LPMM18/4152  Respondent: Nicolas and Judith Ware 20808161  Agent:

MM9 – Green Belt

None of the proposed sites seem to carry any tangible ‘special circumstances’ to warrant insetting from the Green Belt

The concern of many villagers is that – once a little development is permitted – it can establish a basic footprint for greater density of development in future

Woking Borough Council has acted to preserve its open spaces and concentrate development in the town centre

For example, the proposed ‘new Woodham town’ was heavily criticised, and recent planning documents suggest the site will be safe-guarded from development

(The main reasons are to prevent urban sprawl and an encroachment into the countryside, a loss of open space, and limited scope to mitigate traffic)

For the same reasons, the modifications proposed for Send should be similarly dismissed

Therefore I OBJECT to the re-drawing of the GREEN BELT boundaries in the above proposals, and believe other boroughs have set a precedent in this regard

Attached documents:
<table>
<thead>
<tr>
<th>Comment: MM39 - LPMM18/2350</th>
<th>Respondent: Gareth Barnes 20814849</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Regarding New Local Plan</td>
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<tr>
<td>Phase 2 development (LPMM 18 / 39 ?)</td>
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<td>It was appalling enough in the first instance for Waverely B. Council to quietly drop the Greenbelt status on the proposed Aarons Hill site in order to proceed with the ill-considered housing scheme without first consulting the local community and now you intend to follow in the same suit to drop both Green Belt and AGLV status to your portion of what is effectively one field, in order to build even more houses again without proper consultation or God forbid, consideration of the increased impact upon not just the local community but grid-locked Godalming itself.</td>
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<tr>
<td>I can assure you that your proposals and those of Waverely B.C do not sit well with the people of Godalming let alone those who will suffer the brunt from the development.</td>
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<tr>
<td>Despite the problems within the N.H.S the general public view the Green Belt in much the same way; a safeguard of sorts, to protect our much loved and internationally recognized and respected countryside, and thought by many as a last refuge for our declining wildlife; the reality being that our raining but decreasing farmland still supports an incredible amount of flora and fauna. I know this because my family and I have overlooked this particular field for most of our lives and now ecologists and experts confirm what we knew and much more besides, both there and in the surrounding areas.</td>
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<tr>
<td>Taking farmland permanently out of production increases our dependency upon imported foodstuffs; that suits our European neighbours. I'm sure that they are laughing at the moment.</td>
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<tr>
<td>'The wildlife of today is not ours to dispose of as we please. We have it in trust. We must account for it to those who come after.' King George VI. That is still the motto of the Shooting Times and Country magazine and as a non bunny hugger, mine as well.</td>
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<tr>
<td>The much subjugated first nation North American Indians had a very good saying, 'you cannot eat your wealth'</td>
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<td>Never mind Material comments: it is about time some common sense entered the fray.</td>
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<th>Respondent: Gareth Barnes 20814849</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>An appalling lack of consultation with regard to the extra 200 houses you propose for the Aarons Hill site and complete disregard for the local community, Not all of which are either council or ex-council tenants. These deep concerns come from all parts of Godalming and beyond, particularly when Green belt and AONB designated areas are removed. Yourselves and W.B.C. have attempted to hoodwink the general public from Day one. The whole scheme has not been thought through properly and you have diminished your own standing</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment: MM2 - LPMM18/4239</th>
<th>Respondent: Sally Sparham 20816769</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>The number of houses proposed does not appear to reflect the latest ONS figures and projections. The use of Green Belt sites should be reconsidered in view of the town centre brownfield sites and the housing numbers.</td>
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| 2391 of 2554 |
It appears that the Brownfield sites in the town centre are not being considered earlier enough in the planning process. Surely these should be fully utilised before the green belt sites are involved. There seems little effort to improve the infrastructure in the town centre – the traffic flow and pollution levels are appalling. The improvements on the A3 may not be enough to sort out Guildford’s problems and the GBC has no control over the timing for these.

We object to the inclusion of site allocations A26 and A26a forming part of the modified local plan and we believe that these site allocations for development should be removed from the local plan and the land should remain as green belt. These objections have been set out at length in previous consultation responses and at the examination in June.

We object to the following specific modifications:

**MM2** – The Examination should be re-opened because the housing figures used to prepare Guildford’s local plan are out of date and are significantly different to latest ONS figures. The housing figures used by GBC therefore do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

The housing supply figure in table (S2a) is too high. This figure is double the number of homes needed to support what would already be ambitious growth targets for the economy. Consequently, there is a strong case for taking out one or more of the strategic sites. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

We consider that Blackwell Farm (now covered by Policies A26 and A26a) should be the first site to be removed. The reasons being:

- It is the only proposed development site which has a significant impact on the AONB.
- The site currently protects views from the AONB along the Hog’s Back ridge - an important public viewing platform.
- The site cannot be fully built out until after the A3 has been widened, which Highways England states is not certain to happen. Even if the A3 widening scheme was shown to be economically viable (which we consider unlikely), it would be at least another 10 years before 1,500 of the site’s housing allocation could be built.
• Problems related to access to the site have not been resolved. Although the Main Modifications document might address some of the on-site problems relating to the steep gradients on the slopes of the Hog’s Back (by taking much more land within the AONB), it does not address fundamental problems on the local roads:

? The new junction on the A31 would be over capacity and would fail thereby increasing the existing tailbacks on the Hog's Back at peak morning hours.

? Additional pressure would be placed on the Tesco roundabout, which would be over capacity once the development is built out. GBC, which has developed the plan, continues to overlook the fact that this junction provides the only access to the hospital’s A&E department and that this access should be kept clear for emergency vehicles. Presumably the local authority has a duty to ensure the safety of future patients/users of the emergency services.

? There are operational concerns regarding how the proposed ‘through vehicle link’ would be controlled to prevent rat running through the new development, how the enforcement would be carried out (and by whom), whether there is a guarantee that this will be in place for the road’s lifetime (ie in perpetuity), and whether any scheme would be effective at removing the potential for ‘rat-running’ between the A31 and the A3 given the wide range of permitted users of the road.

MM36 – The standalone Policy A26 provides just one access to the proposed development on Blackwell Farm. This would be inadequate and impractical for a development of this size (1800 homes, 2 schools and an extension to the Research Park) and the site allocation should be removed as there is no guarantee that Policy A26a (as a separate policy) would be fulfilled.

Attached documents:

Comment: MM37 - LPMM18/4259  Respondent: Save Hog's Back Campaign (Tom Stevens) 20817537  Agent:

We consider that Blackwell Farm (now covered by Policies A26 and A26a) should be the first site to be removed. The reasons being:

• It is the only proposed development site which has a significant impact on the AONB.

• The site currently protects views from the AONB along the Hog’s Back ridge - an important public viewing platform.

• The site cannot be fully built out until after the A3 has been widened, which Highways England states is not certain to happen. Even if the A3 widening scheme was shown to be economically viable (which we consider unlikely), it would be at least another 10 years before 1,500 of the site’s housing allocation could be built.

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MM37 – Save Hogs Back objects to the inclusion of Policy A26a (access road to the Blackwell Farm development site) as a separate policy to the Policy A26 (the Blackwell Farm allocation). The two policies are mutually dependent and should not be separated.

Attached documents:

Comment: MM23 - LPMM18/4269  Respondent: Paulina Shearing 20817985  Agent:

1. MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

Attached documents:

Comment: MM3 - LPMM18/4267  Respondent: Paulina Shearing 20817985  Agent:

1. MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
2. MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre
3. MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM2 - LPMM18/4312  Respondent: Annmarie Shenton 20819521  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.
2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
   2. There is too much reliance on A3 improvements and these are beyond the council’s control
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.
3. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt

3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

**The A247**

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247
3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh
4. The development of 1800 houses at Gosden Hill
5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247
6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3
7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common,
avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites. This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. **The Guildford Residents’ Association’s Objections and Concerns Which I Share**

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.
MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/4315  Respondent: Annmarie Shenton 20819521  Agent: 

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

Attached documents:

Comment: MM23 - LPMM18/4322  Respondent: Annmarie Shenton 20819521  Agent: 

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:
MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/4316  Respondent: Annmarie Shenton 20819521  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/4317  Respondent: Annmarie Shenton 20819521  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/4318  Respondent: Annmarie Shenton 20819521  Agent:
MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

**Comment: MM35 - LPMM18/4319  Respondent: Annmarie Shenton 20819521  Agent:**

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

**Comment: MM41 - LPMM18/4320  Respondent: Annmarie Shenton 20819521  Agent:**

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

Attached documents:

**Comment: MM44 - LPMM18/4321  Respondent: Annmarie Shenton 20819521  Agent:**

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

**Comment: MM9 - LPMM18/4314  Respondent: Annmarie Shenton 20819521  Agent:**

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Dear Sirs,

There are a number of areas where the Local Plan for Guildford would seem to have deficiencies, which need to be given further consideration. These include:-

1. The council does not seem to have taken into account the use of a considerable number of brownfield sites, particularly in the town centre, which should have been considered for development.

2. Because of this, there is an over reliance on the use of green belt sites for development – the easy answer.

3. Housing number targets would appear to be set too high, in view of the latest projections and ONS figures. This should be subject to further scrutiny.

Attached documents:

(4) The required improvements to the A3 are not certain, and beyond the Council’s control.

Attached documents:

I write to object to the local plan as I feel it is unfit for use.

1) In the 21st. century we should be putting many more abodes in the town centre to ensure that we are developing our town and ensuring that it is sustainable. I am saddened that this hasn't happened in the plan.

2) I am also concerned by the allocation of greenbelt land for housing which will increase traffic around Guildford while losing precious greenbelt land.

Attached documents:

3) Guildford, as you know has been snarled up by road works recently but even before that it is well known as the worst town for congestion. Nothing in the plan addresses any improvement of infrastructure or negotiations with Surrey Co. Council to ensure that Guildford is a pleasant place to live in and visit.

Attached documents:
**Comment: MM13 - LPMM18/4328 Respondent: Angela Gill 20819713 Agent:**

4. **MM13:** The evidence base for retail need and usage in Guildford town centre is out of date and does not take account of current trends (eg, online shopping). Part of the current (over)-allocation for retail usage in the draft Plan could be reallocated to providing sustainable housing. The draft Plan is unsound. The Examination should be reopened.

5. **Proposal for another 500 houses in Send, in the Green Belt:** Please see objection 1 above. Please also note that these proposed houses will be car-dependent, and accordingly, the proposed development would not be sustainable development. Further, no account appears to have been taken of the impact of the increased volume of traffic that such development would have on the Portsmouth Road, Ripley, or on the surrounding local lanes and narrow roads. The draft Plan is unsound. The Examination should be reopened.

**Attached documents:**

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**Comment: MM2 - LPMM18/4327 Respondent: Angela Gill 20819713 Agent:**

I am writing to object to the Inspector’s suggested amendments to the above draft Plan and to continue my objection to the inclusion in the draft Plan of Site A35 - The Former Wisley Airfield/Three Farms Meadows.

I object to the following:

**General:**

1. **Proposed Green Belt release:** The draft Plan is unsound. Guildford Borough Council’s proposed housing provision appears to have reversed the Government’s Spatial Strategy which requires development to take place first in the town centre, then in the urban area, and then on brownfield land. Had Guildford properly applied this strategy, and had “housing need” been properly assessed and taken account of latest statistics, there would be no question of any proposed release of Green Belt land. The draft Plan is unsound and the Examination should be reopened.

2. **MM2:** The current draft Plan and Examination were drafted/conducted prior to release by ONS of the latest Population and Household formation statistics, meaning that the “housing need” figures on which the draft Plan is based and was examined are inaccurate and out of date, rendering the draft Plan unsound. The Examination should be reopened.

3. **MM2:** There should be no requirement for Guildford to take/provide for any unmet housing need from any other borough (including but not limited to Woking). Moreover, the current draft Plan and Examination were drafted/conducted prior to release by ONS of the latest Population and Household formation statistics, meaning that the “housing need” figures on which the draft Plan is based and was examined are inaccurate and out of date, rendering the draft Plan unsound. The Examination should be reopened.

**Attached documents:**

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**Comment: MM23 - LPMM18/4329 Respondent: Angela Gill 20819713 Agent:**

6. **MM23, Policy D1:** The requirement for the social dimension of sustainability (eg, walking distances, pedestrian and cycle routes) should not be watered down, as this proposed amendment would do.

**Attached documents:**

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Comment: MM3 - LPMM18/4331  Respondent: Angela Gill 20819713  Agent:

11 S3: The town centre policy is inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM40 - LPMM18/4332  Respondent: Angela Gill 20819713  Agent:

Site Specific: Site A35, the Former Wisley Airfield/Three Farms Meadows:

In addition to the above, I object to the following:

12 Failure to conduct an Appropriate Assessment or a Habitat’s Regulation Assessment: Guildford Borough Council has failed to conduct/ensure that such assessments have been conducted in respect of the Former Wisley Airfield/Three Farms Meadows, breaching applicable caselaw. The continued inclusion of Site A35 in the draft Plan is unsound, rendering the draft Plan unsound.

13 Failure to take into account the fact that the whole of the Former Wisley Airfield/Three Farms Meadows is a Site of Nature Conservation Interest: The proposed development will destroy the bio-diversity of the SNCI. The continued inclusion of Site A35 in the draft Plan is unsound, rendering the draft Plan unsound.

14 MM47: Proposal to (drastically) reduce the size of the SNCI: The whole of the Former Wisley Airfield/Three Farms Meadows is a Site of Nature Conservation Interest. There is no justification for the proposed reduction in size of the SNCI. The continued inclusion of Site A35 in the draft Plan is unsound, rendering the draft Plan unsound.

15 Addition of new land to the south of the appeal site: Development on much of this “new” land is constrained by the VOR. The inclusion of this new land therefore fails to mitigate the density of the proposed development, which remains objectionable and unacceptable. The continued inclusion of Site A35 in the draft Plan is unsound, rendering the draft Plan unsound.

16 Addition of new land to the south of the appeal site: This land abuts the Ockham Conservation Area, and increases the visibility of any development on the Former Wisley Airfield/Three Farms Meadows to/from the Surrey Hills ANOB. The continued inclusion of Site A35 in the draft Plan is unsound, rendering the draft Plan unsound.

Attached documents:

Comment: MM41 - LPMM18/4330  Respondent: Angela Gill 20819713  Agent:

7 MM41: The proposed Transport Strategy relies on inadequate modelling and takes no account of the (at least) 2 year delay in Highways England’s RIS scheme. This (minimum) delay will impact (and render unworkable, and therefore unsound) any proposed development reliant on that RIS scheme, including that proposed for the Former Wisley Airfield/Three Farms Meadows (Site A35). The draft Plan is unsound. The Examination should be reopened.

8 Proposal to exempt proposed Strategic Sites from design constraints: This is completely unacceptable. The draft Plan is unsound. The Examination should be reopened.
9  Failure of the Examination to take account of recent relevant caselaw: the Examination failed to take account of recent relevant caselaw, for example, that of the Court of Justice of the European Union in *People over Wind*. The draft Plan is unsound and the Examination should be reopened.

10  There is too much reliance on A3 (Guildford) improvements that are beyond Guildford Borough Council’s control and have no fixed timescale.

**Attached documents:**

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**Comment:** MM23 - LPMM18/4363  **Respondent:** Martin Taplin 20820321  **Agent:**

**Issue 2**

I object to MM23/D1 paragraphs 15-17 on Masterplans in respect of two issues.

**Issue 2a**

Generally I think the wording of MM23/D1 is OK. However under point 15 (Masterplans for Strategic Sites), the matters for consideration only appear to relate to ‘on site’ issues.

I feel there is a major shortcoming in the wording of MM23/D1 that the policy does not contain reference to the need, as part of the Masterplanning process, for these major development sites (e.g. Gosden Hill, Blackwell Farm, etc) to take into account the importance of any new development successfully integrating with the surrounding area. I particular am concerned that the development of these major sites should not give rise to unacceptable consequences for the surrounding areas in terms of traffic and the impact on existing community facilities such as schools.

**Attached documents:**

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**Comment:** MM3 - LPMM18/4366  **Respondent:** Martin Taplin 20820321  **Agent:**

**Issue 2b**

As a separate, but related objection, I consider the town centre should be defined as a Strategic Site. It is to the serious detriment of Guildford that at present the development on sites within the town centre are considered in an ad hoc manner. I am particularly concerned that the Plan includes no proposals to improve the appallingly bad conditions for pedestrians as they walk between Guildford Main Line Station (8 million passengers a year) and the town centre. The conflict between pedestrians and vehicles a the crossing of Onslow Street is serious both in terms of pedestrian safety and the dangers fro pollution. There needs to be a requirement in the Local Plan for a Masterplan to be prepared for the town centre in order to frame and direct the overall development of the town centre and to address major issues relating to pedestrian movement.

**Attached documents:**

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**Comment:** MM9 - LPMM18/4362  **Respondent:** Martin Taplin 20820321  **Agent:**
I wish to submit objections to the proposed Modifications to the Local Plan Review.

**Issue 1**

The proposed allocations of Green Belt land are damaging to the character of the town and the surrounding countryside. It is clear that in the light of the latest Government projections in relation to the housing, the present figure for the Borough need to be reduced.

**Attached documents:**

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**Comment:** Other comments - LPMM18/4368  **Respondent:** Martin Taplin 20820321  **Agent:**

**General Comment**

Finally, I would wish to add that I think there is a danger that this whole review process has become intensely complex and divorced from the practise of town and country planning - certainly as I know it. It seems to me that we are moving towards a Local Plan which contains more and more words and policies but which, in the end, will be a Plan which will largely be indecipherable in terms of its application by both planning officers and developers involved in the development control process and certainly for Councillors who will be confused and bamboozled by the complexities.

**Attached documents:**

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**Comment:** MM45 - LPMM18/4393  **Respondent:** Linda Pike 20820545  **Agent:**

I am writing to object to the proposed development of the Green Belt land between Glaziers Lane and Flexford, Ref(MM45 )Policy 64.

What are the “special circumstances” that justify building on this Green Belt land? A proposed development of only 9 houses has already been refused for this site. Building on this side of the railway will open up more land to erode the Green Belt even further.

A development of this size will have a massive negative effect on the local wildlife. This area is within the Wanborough and Normandy Woods and Meadows Biodiversity Opportunity Area which directly meets National Planning Policy Framework .

**Attached documents:**

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**Comment:** MM2 - LPMM18/4493  **Respondent:** Amanda Baines 20822369  **Agent:**

Having attended a meeting hosted by the Guildford Vision Group on the subject of the Local Plan (and as a long standing resident of Guildford) I feel I must comment on the worrying proposals which fails to address the challenges that that confront the town centre in the 21st century.

Despite the Allies and Morrison Local Plan costing vast sums, there is no sign of Guildford Borough Council presenting a transparent, democratic and responsible plan for the sustainable future of Guildford town centre. There continues to be an
ad hoc and disconnected approach to granting permissions piecemeal with little awareness of the congestion, pollution and unpleasantness that increasingly beleaguer the town centre.

Once away from the High Street, there is urban decay. Retail outlets are imploding globally so creating more retail square footage which will remain empty is a massive waste. The figures in the current plan must be corrected to reflect this trend.

Proposals focus on car dependent greenfield sites surrounding Guildford. GBC and Highways England have not done nearly enough work on the infrastructure that is needed to support the proposed 6,000 homes. Guildford is at full capacity with vehicles now. As we are seeing at the moment, just one lane out of action in the town centre gyratory system causes total gridlock.

There are currently in excess of 300 flats on the market in Guildford with thousands more proposed. The Local Plan does nothing to address the desperate need of 2 and 3 bedroomed family homes with a garden and outside communal areas such as on the Olympic Park site. In addition, based on the latest figures, the stated numbers of dwellings required are incorrect and should be adjusted immediately.

Developing brownfield sites should be a priority before releasing any greenfield areas for development. It is a mystery as to why GBC is conducting this approach. Sadly, there does not seem to be much proper scrutiny to proposals by Councillors who have realistic and informed local knowledge of the town centre.

Guildford is an historic market town and with the correct approach could become a sustainable, economically viable and really lovely place to live and work in. The current plan fails on almost every level. All interested parties should be held accountable for the impact of their proposals on Guildford and its residents. If these prove unsound then viable alternatives must be considered as matter of urgency.

Attached documents:

Comment: MM40 - LPMM18/4530  Respondent: Neil Graham-Wigan 20824417  Agent:

MM40 Policy A35: Former Wisley Airfield

Whilst this Policy sets out a number of minor changes to Site Policy A35, it seems to completely miss the fact that the Secretary of State gave a robust refusal to planning permission for a similar development earlier this year (June 18). Please could you explain why the GBC have thus chosen to keep this site development within the local plan?

In providing his verdict the Secretary of state gave substantial weight to the harm which would be caused to the Green belt by this development. Further he stated that there would be massive impact to the road infrastructure, to the heritage assets, the character and appearance and the landscape including view from the Surrey Hills. Personally, I cannot see the difference in the development proposed by the “Wisley Property Investments Ltd.” and the proposal put forward by the GBC I thus do not see how you can keep Site A35 in your proposal. Please remove it immediately from the local plan and allow the Secretary of State’s decision to stand.

Thank you very much for the consideration of the above points and please feel to get in contact directly should you wish to speak further.

Attached documents:

Comment: MM9 - LPMM18/4529  Respondent: Neil Graham-Wigan 20824417  Agent:
RE: Guildford Borough Council Local Plan – Public Consultation on modifications

As a long-term resident of East Horsley (8 years), I wanted to write to make comment on the proposed Local plan submission ahead of the deadline 23rd Oct 2000. In particular I would like to make comment on 2 of your modifications MM9 and MM40.

MM9: Policy P2: Green Belt

This policy appears to have been completely redrafted however no mention is made of the overall reduction in households from ONS. It is thus very disconcerting that the council plans to put 66% of the proposed housing on land which currently sits in Green belt land rather than looking to descale their proposals and protect this special space!

Further I would like to draw the Council’s attention to the “Exceptional circumstances” that are required to amend the Green Belt boundaries or the “Very special circumstances” necessary to justify any developments in the Green belt. In my opinion I do not see how the Council can claim that either of these can exist. It feels like the Council are simply looking for any easy way to build bulk housing. There are no special sets of circumstances that exist to justify building 66% of all housing in the Green belt! I believe the Council’s time would be much better spent re-examining policy S3 town centres where there is much more opportunity for development.

Attached documents:

Comment: MM45 - LPMM18/4531  Respondent: Peter Medley 20824513  Agent:

Your Ref: Main Modification 45/Policy A64

I am writing to reject the proposed housing development.

This plot/field proposal should not be used as part of the County’s extra housing project. This land is designated ‘Green Belt’ land. You must use all brown field sites before you even consider taking away precious green belt land. Just because the brown field sites are not cost effective is not a good enough reason to start building over the green belt, as and when it suits. This request for extra housing is government lead; therefore I would request that the government part fund the development of brown field sites to make them appealing to the property developer. This proposal is cash lead not environmentally lead.

I understand that this piece of land was considered very late in GBC Local Plan and therefore has no added infrastructure or benefits to the proposed new and present villagers of Normandy. This development will over stretch the local doctor’s surgery, our sewage system, major traffic delays in getting in and out of the village.

If the thinking behind using this land was the convenience of Wanborough train station, with all new residents using the train? I hate to disappoint but it’s not an affordable way to travel if you are on a low income. Plus the majority of new residents will work outside of Guildford town centre, thus requiring a car. As a resident of Normandy many use Brookwood and Woking stations as they are far more reliable. Replacement buses are constantly being used to get to and from Wanborough station.

Your local development team have refused many a housing application on this piece of land. Please oppose this application. It is not suitable to house such a large development, let alone its Green Belt land. It’s protected for a reason.

Attached documents:

Comment: MM13 - LPMM18/4537  Respondent: Gary Pask 20824737  Agent:
MM13 – Again the evidence used by the Council in relation to retail shopping is out of date and does not consider the current crisis on the High Street as a result of the shift to online shopping. The overall UK retail market is not growing, and an increasing percentage is now held by online players. Retailers are currently closing outlets.

Attached documents:

Comment: MM2 - LPMM18/4535  Respondent: Gary Pask 20824737  Agent:

I object to the recent modifications made to the GBC Local Plan. The general grounds upon which I object are:

MM2 – the ONS figures and household projections have not been considered. The hearing needs to be reopened.

MM2 – on what basis is there a requirement for Guildford to meet Woking’s unmet housing need? This will inevitably require a further and unacceptable release of green belt land. The addition of a further 500 houses in Send which does not have adequate public transport, will have a severe impact on Portsmouth Road in Ripley. This does not appear to have been considered.

Attached documents:

Comment: MM40 - LPMM18/4539  Respondent: Gary Pask 20824737  Agent:

Specifically, I object to the modification on the following grounds:

Adding land to the south of the Wisley Airfield appeal site does not mitigate the density issue since a significant part of the ‘new land’ is constrained by the VOR.

Land to the south abuts the Ockham Conservation Area and makes the site more visible to and from the Surrey Hills, an Area of Outstanding Natural Beauty.

It is inevitable that the biodiversity of the SNCI will be destroyed by the proposed development. It is worth noting that the modifications drastically reduce the size of the SNCI despite the fact that it qualifies on ecological grounds. It appears that the necessary assessment of the area in terms of Habitat Regulation have not been carried out as required by law.

Attached documents:

Comment: MM41 - LPMM18/4538  Respondent: Gary Pask 20824737  Agent:

MM41 – Far too much reliance has been placed on transport improvements over which the Council has no control. Additionally, the delay in the proposed Highways England improvements to the M25 J10, means that the Council cannot sensibly develop a plan that relies so heavily upon the scheme which again is outside its control.

Attached documents:
Comment: MM9 - LPMM18/4536  Respondent: Gary Pask 20824737  Agent:

MM9 – infilling land in and around villages will inevitably result in the weakening of the protection of the countryside.

Attached documents:

Comment: MM41 - LPMM18/4544  Respondent: Peter Mew 20825313  Agent:

I object to the plans to build more houses in the Send area of Guildford,

Nowhere have I seen plans to increase the local infrastructure to cope with several thousand additional residents.

No additional GP surgeries

No additional Schools, in fact schools are being closed

No additional police

No additional Public Transport

No additional parking spaces in and around local shopping areas

No additional Hospital Places at the Royal Surrey to cope with additional residents in the wider area (tens of thousands)

Addressing the specific Garlick's Arch Surrey to cope with the extra runoff of groundwater caused by several acres of additional concrete. the contours of the land, as it is at the moment, would see all this additional water, flood across the Old Portsmouth Road.

Attached documents:

Comment: MM39 - LPMM18/4582  Respondent: Louise Welburn 20825729  Agent:

I wish to register my objection to Local Plan - Main Modifications MM39: Release of Green Belt land at Aaron’s Hill, Godalming for the development of 200 homes.

This is Green Belt land, but in MM39, it is referred to as Godalming Urban Area. Is this a mistake or are you trying to remove it from the Green Belt by stealth? A response would be much appreciated.

The proposed release of Green Belt land and large-scale development will:

- Devastate the protected species on this land, one of which is the Barbastelle bat which is extremely rare and vulnerable to extinction wildlife (European Protected species and UK Biodiversity Action Plan species). The land is also home to many RSPB red and amber listed birds due to rapid population decline (as a result of loss of habitat/food sources). Mitigation measures of dotting about some bat and bird boxes are woefully inadequate when you’re concreting over their habitat and food sources.

- Worsen traffic on roads that already experience frequent congestion and pollution levels already in excess of safe limits (see Waverley Borough Council’s own website). Pollution levels at the nearest monitoring site, located on the A3100 Ockford Road are already in excess of safe limits.
E.g. DEFRA published NO2 limits in the “National Air Quality Objectives and European Directive Limit and Target Values for the Protection of Human Health.” The annual mean should not exceed 40 μg/m³. The mean of the NO2 diffusion tube results for Ockford Road between 28/09/17 and 03/01/2018 was 42.97 μg/m³ which already exceeds the limit, and between 3/1/18 and 4/7/18, the mean of the NO2 diffusion tube results for Ockford Road again exceeds the 40 μg/m³ limit at 40.22 μg/m³.

In their “UK plan for tackling roadside nitrogen dioxide concentrations - An overview July 2017”, DEFRA and the Department for Transport state that: “Evidence collated by Defra, Public Health England and the Local Government Association shows that short-term exposure to high levels of air pollution can cause a range of adverse health effects including exacerbation of asthma, effects on lung function, increases in hospital admissions and mortality. A review by the World Health Organization concludes that long-term exposure to air pollution reduces life expectancy by increasing deaths from lung, heart and circulatory conditions. There is emerging evidence from the Royal College of Physicians (amongst others) of possible links with a range of other adverse health effects including diabetes, cognitive decline and dementia, and effects on the unborn child.”

Attached documents:

**Comment: MM13 - LPMM18/4623  ** **Respondent: Nigel Baines 20826369  ** **Agent:**

**MM13 Retail**

The retail needs figures are revised to show an increase in net capacity to 2030 of 28,202 m². This is hopelessly optimistic given retail trends away from the high street towards online shopping. They risk therefore sterilising land with unrealistic allocations and demands. The retail requirements should therefore be reduced.

**Attached documents:**

**Comment: MM23 - LPMM18/4624 ** **Respondent: Nigel Baines 20826369  ** **Agent:**

**MM23 Policy D1**

GBC, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council.

**Attached documents:**

**Comment: MM3 - LPMM18/4621  ** **Respondent: Nigel Baines 20826369  ** **Agent:**

**MM3-Policy S3**

- GBC must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites
- Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.
GBC should adopt Guildford Vision Group’s proposals including the new crossing or equivalent alternative, to deliver a safe...

**Comment:** MM9 - LPMM18/4622  **Respondent:** Nigel Baines 20826369  **Agent:**

**MM9 Green Belt Policy**

Despite the apparent policy that the Green Belt will be protected, I consider that this is not being implemented in practice. Given that the modifications include substantial additional settlements in GB, SNCI removal, that all the key sites have been found sound, that insetting is being permitted (which will remove wildlife corridors as large gardens are developed) it seems that the Local Plan sees our wildlife and biodiversity as an obstacle to be swept aside. This is not in either the spirit or the letter of the rules as proposed by the NPPF.

**Attached documents:**

**Comment:** MM23 - LPMM18/4632  **Respondent:** Mark Rymell 20827297  **Agent:**

MM23 – the importance of Master Planning is appreciated and supported. This is especially important for Gosden Hill Farm (Policy A25) to ensure that no development takes place until agreement is reached between the developer and GBC on the key infrastructure requirements. However, this Policy makes no specific reference to infrastructure nor to the means by which the Master Plan will be approved.

**Attached documents:**

**Comment:** MM35 - LPMM18/4634  **Respondent:** Mark Rymell 20827297  **Agent:**

MM35 – in view of the impact that the development of Gosden Hill Farm will have on the residents of Merrow we are pleased to note that consideration should be given at the Planning Application stage to safeguard land for a possible connector road to the B2215 London Road /A247 Clandon Road. We trust that this provision will be retained in the Local Plan as it goes forward.

MM35 – Transport Strategy (1) for Gosden Hill Farm covers a two-way junction with the A3 whilst Transport Strategy (2) covers the possibility of an all movement junction of the A3, A3100, the B2215 and the A247. However, we consider this to be inadequate and are of the view that there should be a four-way junction on the A3 itself at Gosden Hill Farm to avoid the unacceptable traffic congestion that this development will cause to both Burpham and Merrow and that Transport Strategy(1) should be amended accordingly.

**Attached documents:**

**Comment:** MM2 - LPMM18/4680  **Respondent:** PRP (Lucy Morris) 20828385  **Agent:**
RE: Guildford Borough Council Local Plan Main Modifications Consultation

I write in response to the consultation on main modifications to the Local Plan for Guildford Borough Council ("GBC").

The representations included in this letter can be summarised as follows:
- Commentary on the proposed Main Modifications.
- The Site, local context and site history.
- The change in spatial context.
- The Site's ability to deliver much needed housing early on in the Plan period.

The following additional information has been submitted in support of these representations and can be found in the attached appendices:
- Appendix 1 - Vision Document.
- Appendix 2 - Site Layout.

MAIN MODIFICATIONS

The proposed main modifications shows the proposed rewording of Policy S2 1.1 (Planning for the borough - Our Spatial Development Strategy). GBC have removed the stepped housing trajectory and replaced it with a flat trajectory, in line with the Inspector's advice at the conclusion of the initial round of hearings. This puts GBC's annualised housing requirement at 630 dwellings.

1.2 Paragraph 4.1.10 of the main modifications text reads as follows:

_National policy states that where possible the deficit accrued since the start of the plan period should be met within the first five years. Given the step change in housing requirement compared to past delivery rates which have been constrained by Green Belt policy; the accrued backlog at the date of adoption is significant. Whilst the plan includes numerous smaller sites capable of being delivered early in the plan period, there are a number of strategic sites that have longer lead in times. For these reasons, the backlog will be met over the plan period, using the Liverpool approach to calculating a rolling five year housing land supply rather than the Sedgefield approach. For the purposes of calculating the five year land supply, the housing requirement from 2015 to 2018 is 630 dwellings per annum, and from 2019 to 2034 it is 672 dwellings per annum, which includes an allowance of 42 dwellings per annum to contribute towards meeting unmet needs from Woking Borough._

1.3 GBC has decided to stick with a Liverpool approach to ensuring a five year housing land supply to spread the historic undersupply of housing across the plan period, rather than the Sedgefield approach preferred by the Inspector which would provide for the undersupply in the early plan period.

1.4 The Council's justification for maintaining a Liverpool approach is that there are a significant number of strategic sites which have been allocated housing which will come forward later on in the plan period due to the need to provide greater levels of infrastructure before housing can be built. This justification is weak due to the fact that one logical way to ensure that housing shortfall is met within the first five years is to increase the number of smaller sites which have the ability to deliver housing at an earlier stage in the plan period.

1.5 This approach does not seek to promote positive plan making and does not address the acute affordability issue within the borough.

1.6 In selecting sites the council must have regard to the settlement hierarchy. Send is within tier 4 of this hierarchy, the second highest after the town centre (tier 1) and the wider urban area (tier 2).

1.7 In his initial response to the council, set out within document ID7 the inspector asked the council the following questions:

- In selecting sites, did the Council pass too quickly down the settlement hierarchy? Did it move the goalposts to avoid conclusions it didn’t want and get to the outcome it wanted?
• Should there be much more attention to Tiers 1 and 2 of the hierarchy? Should the Council have demonstrated that they had explored a range of mechanisms to deliver urban sites before they could demonstrate exceptional circumstances to remove land from the Green Belt?

• How could a major Tier 9 site be put forward when there are clear opportunities for development further up the settlement hierarchy?

1.8 It is therefore considered that whilst attention should be provided to tier 1 and tier 2 (in order to demonstrate exceptional circumstances) the council must revisit sites in tiers higher in the settlement hierarchy before considering those much lower down.

1.9 The Inspector also focused on the Villages within the questions set out within ID7 and stated:

• Is the proportion of homes allocated to villages too small? Should the Council consider development adjacent to villages as the best way of boosting the delivery of homes within the first 5 years from adoption? Should villages close to Guildford be given favourable consideration?

1.10 Send is one such Village and it is considered that development adjacent to the village 1.10 is the best way of boosting the delivery of homes in the early years as set out by the inspector.

• In giving villages a lower position in the hierarchy, has the plan failed to recognise that some are sustainable and have a range of transport facilities and local shops?

1.11 Send Village has a range of shops and facilities which are all within walking distance of this site as set out in the accompanying document.

1.12 The amendments to Policy ID2 (Supporting the Department for Transport's "Road Investment Strategy") indicate the increased potential for the Local Plan to require an early review. The proposed modification to this policy includes the following justification:

*The evidence at the time of the Examination of the Local Plan was that, without the implementation of the A3 Guildford scheme, the cumulative impacts of the quantum and distribution of development in the Local Plan could be considered to become severe during the second half of the plan period. Nevertheless, the evidence also indicates that individually, site allocations may be able to be occupied in whole or substantial part without creating a severe impact on the Strategic Road Network as there are potential alternative transport measures that may reduce or limit the impact of additional traffic on the A3. A review will determine whether the proposed transport measures or additional transport measures can mitigate the cumulative impacts of development traffic on the A3 either during the period that the A3 Guildford scheme is delayed, in response to a reduction in its scope or in the event of its cancellation. If a review determines that transport measures are not able to mitigate a severe impact on the A3 then a review of the Local Plan is likely to be required.*

1.13 It is unclear to what extent the proportion of GBC's housing requirement is reliant on the improvements to the A3. This is a major risk in adopting the plan in its current form. Should the improvements not come forward, this would mean a significant change to the spatial strategy of GBC. If the Inspector were to be minded to allow a Local Plan review mechanism on this basis, this would cause further underdelivery and supply of housing which would only exacerbate the already critical affordability issue within the borough.

1.14 Reviewing a Local Plan in order to seek alternative sites to meet supply would still require GBC to go through stringent consultation and examination requirements. This would increase delays to housing delivery and create a situation where sites which are able to come forward within the next five years, are significantly delayed.

**TANNERY LANE**

**THE SITE**

The Site is located to the north east of the village of Send, to the south of 1.15 the River Wey. Extending to approximately 2.9 ha of agricultural land, the site is bounded to the south by the redundant buildings of the former Clockbarn Nurseries. This Site has been allocated in the emerging Local Plan for 60 units under policy A42. To the north,
the Site is bounded by the marina and a field with the River Wey beyond and to the west by existing residential development along Wharf Lane.

Figure 1: Site Location

1.16 The Site currently lies in the Green Belt and abuts the settlement boundary of Send. The Corridor of the River Wey, the River Wey Navigation Conservation Area and a Site of Nature Conservation Interest lie to the north of the site, but not adjacent to it. An extract from the Local Plan proposals map is included below (figure 2).
Figure 2: Policies Map

LOCAL AREA
The Site is well connected to the strategic road network, with the A247 (Send 1.17 Road) linking with the A3 at nearby Burnt Common and Ripley. The Site is also well served by local facilities, with a range of shops, services and schools within walking distance of the Site.

1.18 The village of Send is ranked as the fifth most sustainable settlement within Appendix V: GBC Settlement Hierarchy Assessment Schedule of the Green Belt and Countryside Study (2013). The parcel of land which the Site falls within (B16-C) is ranked as the eighteenth most sustainable potential development area out of a possible 41 sites.

1.19 This clearly demonstrates that the Site offers a sustainable and logical location for residential development.

SITE HISTORY
1.20 This Site forms part of a wider development area which was promoted throughout the Local Plan period (figure 3).
1.21 The wider site was originally submitted to GBC for consideration for residential development in February 2013 as part of the Green Belt and Countryside Study. This study looked at the potential for a major expansion of Send and concluded that this area of land would be suitable for such a development. The impact of the development on the openness of the Green Belt was considered to be limited due to the enclosure provided by tree-belts and hedgerows. It was also recognised that there was the opportunity for a waterfront development to provide leisure and employment uses.

1.22 The wider site was also reviewed in the June 2014 SHLAA and was given an allocation in the Regulation 18 Local Plan Strategy and Sites (2014) for either housing (C3) and a public village car park or housing (C3), public village car park and marina (sui generis) (Allocation Number 75). The wider site was seen as an opportunity for mixed used development in a sustainable location.

1.23 At Regulation 19 consultation stage (2016), Clockbarn Nursery was allocated under A42 for 45 units. This was increased to 60 units in 2017 as a result of this consultation. However, the remainder of the wider site was discounted on the basis of harm caused to the Green Belt. The Sustainability Appraisal (2016) cited the exclusion of the Site as a result of its grading as a 'red-rated' Green Belt site and proximity to the River Wet Navigation Conservation Area.

1.24 As part of the Main Modifications, GBC released an update to their Sustainability 1.24 Appraisal (September 2018) which set out to justify the re-allocation of Land east of Aldertons Farm, Send Marsh (Allocation number A63). Alongside the assessment of this allocation were assessments of an additional three potential development sites which are as follows:

- Land North of Tannery Lane (100 homes);
- Land South of Tannery Lane (50 homes);
- Land at Polesdon Lane and Send Marsh Road (120 homes).
Of the four sites assessed, this Site was seen to be the least desirable due to its proximity to the River Way Navigation Conservation Area, according to the Sustainability Appraisal (Addendum, September 2018).

Within the 2016 version of the Sustainability Appraisal, the justification for the removal of the Site from an allocation in the Regulation 18 version of the plan is set out. Here, GBC reason that it should be excluded due to it being a 'red-rated' Green Belt site.

GBC's Green Belt Review (Green Belt and Countryside Study, 2013) only considered large parcels of land and did not assess smaller parcels of land against the Green Belt purposes. In the case of this Site, which fell into the wider parcel of B16, was considered to have a high sensitivity in relation to the Green Belt, meeting three of the four assessed purposes (Purpose 1, 3 and 4).

This larger parcel of land was considered in relation to four of the five purposes of the Green Belt, as set out within paragraph 80 of the 2012 NPPF. A summary table of GBC's assessment is shown in figure x below.
In the initial response to the council during the hearing sessions (ID7) the inspector set out the following comments in relation to the Green Belt and Countryside Study:

- Was the GBCS approach too coarse-grained in looking at the whole parcel in relation to the Green Belt and paying insufficient attention to the contribution that individual sites made? Should the potential for mitigation have been investigated before ruling sites out?

The intention behind purpose one of the Green Belt is to prevent the urban sprawl of the settlement to which it surrounds. In this case, GBC lies within the Green Belt surrounding London. Additionally, Guildford is considered to be a 'large built-up area'. Therefore the Green Belt serves to restrict the urban sprawl of London and Guildford, rather than smaller settlements within the borough.

Within its Green Belt methodology, GBC have considered that the villages of Send, Send Marsh and Ripley as large built-up areas. This is not consistent with the underlying principle of this purpose of the Green Belt. None of these three settlements can be classed as large built-up areas and thus this parcel of land does not meet the first purpose of the Green Belt.

The second purpose relates the maintaining the Green Belt in order to prevent the merging of neighbouring towns. GBC have assessed this parcel of land in relation to the merging of Send, Send Marsh and Ripley. None of these three settlements are classed as towns in the settlement hierarchy and therefore it should be considered that parcel B16 does not meet this purpose of the Green Belt.

If this purpose were to be considered within the context of the merging of Guildford and Old Woking, it is argued that the presence of the River Wey Navigation acts as a natural barrier between Send and Old Woking. The land to the north of the River Wey Navigation is protected as a Site of Nature Conservation Importance, it part of the flood plain and is owned by the National Trust. This means that it is highly unlikely that development would come forward which would result in the coalescence of Old Woking and Send.

B16 was assessed to not result in encroachment into the countryside, largely due to the presence of the River Wey Navigation which runs along the northern boundary of the parcel.

Purpose four is underpinned by the intention to protect historic towns such as York or Bath, not the inclusion of conservation areas or small historic settlements as part of the Green Belt review methodology. Listed buildings and conservation areas are site constraints which should be taken into account after the Green Belt Assessment, not as a part of it. It is therefore considered that this purpose cannot be applied to this parcel of land.
1.36 Additionally there has been no revisiting of the Green Belt purposes in relation to the sub-area of B16-C which this Site falls into. It has not been considered that different sub-parcels within B16 will contribute differently to the purposes of the Green Belt.

1.37 The Green Belt and Countryside Study (2013) provided a generic assessment but there is a lack of clear justification further on in the Local Plan process which details how this specific parcel contributes to the purposes of the Green Belt. The study stated that:

*B16-C is surrounded by defensible boundaries including tree-cover following the River Wey Navigation to the north, substantial hedgerows near a farm complex and Tannery Lane to the east, and hedgerows bordering a horticultural nursery and residential gardens to the south of the PDA.*

1.38 If the parcel B16-C were to be assessed again as in figure 5, it is believed that it would not fully meet any of the four assessed Green Belt purposes. As a result, it is recommended that the site be released from the Green Belt and allocated for development.

1.39 It is important to note that there has been a distinct change in the spatial context of the Site. Within the Regulation 18 consultation documents, the wider allocated site was considered to be suitable for C3 housing, a village car park and a marina or; C3 housing and a village car park.

1.40 At present, a marina has been built on the north-eastern section of the wider site adjacent to the expanded Send Business Centre with a car park and a number of buildings located directly to the south. Clockbarn Nursery along the southern border has been allocated within the Local Plan for 60 units. Existing residential development on Wharf Lane runs along the western boundary of the Site.

1.41 This means that the Site is now surrounded by development (or proposed development) on three sides, with the River Wey acting as a natural barrier to the north. As a result, it is considered that this Site could gain planning permission through limited infilling under Green Belt policy. However, it is believed that the best and most efficient use of this land would be through a release from the Green Belt and an allocation for residential development.

**OPPORTUNITIES**

1.42 The Site presents multiple opportunities for sustainable development above and beyond its sustainable location.

1.43 The proposed scheme for the Site offers the provision of 66no. C3 dwellings with a policy compliant level of affordable housing ranging from 2 to 4 bed units. Alongside this, there is the potential for the provision of a 60no. bed care home (C2), meaning a total of 122 dwellings/bed spaces.

1.44 The care home would provide a public access communal area in the form of a coffee shop and would allow access to the marina. This would create an integrated development which would provide homes a wide range of needs.

1.45 A significant advantage in allocating this Site is the ability for a greater number of units to be delivered at a quicker rate. A site this size requires a lower level of infrastructure to be put in place before units can begin to be built and houses can be completed. This is in line with the Inspector's advice for GBC to seek development opportunities that have the ability to deliver much needed housing early on in the Local Plan period.

1.46 It is envisaged that upon the assumption that the Local Plan is adopted in March 2019, a planning application could be submitted in the summer of 2019 with planning permission granted in early 2020. Work would be able to begin on site in the summer of 2020 with completions in 2021. This clearly demonstrates the early deliverability of the scheme.

1.47 Apart from the Green Belt, the Site does not have any specific constraints which would prevent development coming forward or reduce the capacity of the site. The Site is located within Flood Zone 1 and would not result in the loss of agricultural land. There are no heritage concerns at the Site. The River Wey Navigation Conservation Area is not located adjacent to the Site and would not be impacted by development at this location.

**CONCLUSION**
The Procedural Practice in the Examination of Local Plans issued by the Planning Inspectorate (June 2016 4th Edition v.1) deals specifically with 'Post-Submission Changes Initiated by the LPA' and specifically states at paragraph 5.22 that:

The consultation on the proposed change may generate new representations. If so, in the interests of fairness, the Inspector will provide an opportunity to appear at the hearings to those who seek an amendment which follows directly from the LPA’s proposed post-submission change(s) to the plan.

We are firmly of the opinion that it is necessary to re-open the examinations in the interests of fairness so that further evidence can be heard from landholders and others on the modifications proposed. The site is suitable, available, achievable, developable and deliverable.

I trust that the comments made in these representations will be taken into account in the further modifications to the emerging Local Plan.

see attached for appendix

Attached documents: PRP_Rep_Redacted.pdf (13.1 MB)

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Comment: MM41 - LPMM18/4776  Respondent: Nicole Smith 20832001  Agent:

I write to voice my objection to the proposed building of 550 new homes on land at Garlicks Arch, Send Marsh. My family and I moved here over 30 years ago because it was a quiet village with easy access to countryside. The building of this number of new homes would have a detrimental effect on the village with regard to increased traffic. The traffic jams in the area during rush hours are bad enough now but will be horrendous if the number of cars from these new homes increase on our roads.

The local school is situated on a busy main road, and the number of parents trying to park at drop off and picking up times is a nightmare anyway. These parents already park half way across pavements, block other residential driveways and park in the local surgery so that patients find it difficult to park there at drop off/up time. So any increase in traffic from new homes on this main route from Woking onto the A3 would no doubt cause even more of a nuisance than it already is. And none of this is helped by the closure of Ripley school this summer.

The local GP surgery is already under strain, without the possible addition of 800 to 1000 new residents in the area.

Would people want to buy houses right next to the A3? Surely traffic fumes and noise would be detrimental to the health of families living there? Thus adding to the strain on the NHS.

Lastly, this area is green belt land, and part of it contains ancient woodland. Once it has been built on it can never be recovered. It will be lost forever to future generations.

Attached documents:

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Comment: MM39 - LPMM18/4781  Respondent: Christine Davies 20832129  Agent:

As recently as 2017 compelling reasons were given for maintaining the Green Belt status of this land. WBC has now chosen to disregard the evidence for this decision, and GBC appears set to do the same.
The impact of the proposed developments on this area due to lack of infrastructure, increase in traffic on already heavily congested roads and the effect on the natural environment appears to have been given little consideration or, in some cases, misrepresented. Apart from meeting housing quotas well in excess of what is now required it is difficult find anything positive in this plan.

Attached documents:

**Comment:** MM2 - LPMM18/4824  **Respondent:** Nina Mileksic 20832321  **Agent:**

Please see my comments on proposed Main Modifications 2 and 39 (Aarons Hill land) which also form the basis for my objection to allocating Aarons Hill land for house building under the local Guildford plan.

**Transport and Traffic**

Sustainability assessment states there is good bus service which is incorrect. The bus service is currently once an hour, with residents reporting the buses frequently get stuck in traffic and often missing out the entire Aarons Hill area as the drivers attempt to cut delays to their schedules.

There is only one access road to the estate (Eashing lane) which is narrow, with steep hill from A3100 junction up to Aarons Hill. Pavements are narrow and unsuitable for elderly, prams or people with mobility constraints, and in places the pavements are a death trap, especially in winter. No traffic calming measures or speed limit enforcement means drivers often speed along the entire stretch of Eashing lane, making it unsafe for pedestrians and cyclists alike.

This would be the only access for emergency vehicles for an estate of over 1500 people (including Waverley side of the development and existing Aarons Hill estate), which is inadequate. Pairing this up with frequent traffic jams and the narrowness of Eashing lane from A3 to A3100, there is a serious risk that emergency vehicles would not be able to access the new development in a timely manner.

Eashing lane is a narrow country lane, for most of it without any pavements for safe pedestrian use and it is unsafe for cyclists due to sharp corners and excessive speed of many drivers. In most places it is too narrow for a car and a lorry to meet – there have been instances of the road being blocked by a lorry that got stuck for over 20 minutes and needed help of residents to manoeuvre out of Lower Eashing.

**Ecology**

The Waverley side of the field was surveyed by an ecologists as part of the existing planning application for 262 dwellings. Even though the ecology reports significantly downplayed the impact of the development on the environment, it became very clear that the site holds an astounding levels of biodiversity. Some of the protected species identified are listed below:

7 species of bats, one of which is Barbastelle bat, Habitats Directive Annex II protected species and classified as Vulnerable to Extinction. This is an important find and if there is a maternity colony on site, this site could be a good candidate for a Special Area of Conservation. Further investigation is needed to establish the size of Barbastelle population and how they use the site. They can cover wide areas and it would be key to understand if they are present on the Guildford side as well.

There is also potential for Hazel Dormouse to be present and Natural England requested more information to be obtained on this matter.

In addition, the following protected birds were identified to be using the site:

**Birds:**
RSPB **red listed** due to rapid population decline (as a result of loss of habitat/food sources):

Skylark (*Alauda Arvensis*),

House Sparrow (*Passer Domesticus*) – also Defra Red listed

Starling (*Sturnus Vulgaris*) – also Defra red listed

Song Thrush (*Turdus philomelos*) - also Biodiversity Action Plan species

RSPB **amber** listed due to population decline (as a result of loss of habitat/food sources):

Swift (*Apus apus*);

Dunnock (*Prunella modularis*)

Kestrel (*Falco tinnunculus*)

As the ecology reports were of inadequate quality and were downplaying the impact on the environment, it is highly likely that significant omissions of other protected species occurred.

An independent ecology survey of the entire site would be necessary to establish the level of biodiversity overall and the impact of any development on the protected bats, birds and any Hazel Dormice.

Even without an additional survey it is clear this site contains a significant level of biodiversity which - according to the NPPF - should be protected for future generations.

**Climate change**

Recent scientific evidence has shown that climate change can adversely impact two important factors in food production and distribution: weather related events can cause significant disruption to transport infrastructure, and it can reduce crop yields on a global scale, which in turn can cause stress to agriculture industry, in turn causing food insecurity in certain regions and disrupt the food supply chain. On the national/local level, that means that over-reliance on food imports can cause significant concern in terms of food supply. As the instances of severe weather events are likely to occur more frequently, it is important to consider these factors (food production and distribution) in local planning terms.

In the light of the emerging climate risks it would be unwise to continue to build on fertile farmland – the proposed Aarons Hill site is in its entirety a fertile field growing a wide variety of crops.

**Housing Projections**

The latest ONS statistics (published September 2018) and population growth projections based on 2016 data showed significant decline in population growth. This was before the effect of Brexit referendum on immigration showed in the data. The immigration after Brexit referendum has fallen significantly.

According to ONS, the two main factors contributing to population growth are immigration and longevity (birth rates keep declining). As immigration has significantly fallen since June 2016, and life expectancy is stagnating (according to ONS data 2015-2017), the next data set for 2018 is likely to show even more significant decline in population growth.

This puts the current planned housing numbers for Guildford in a very different context, and needs serious consideration.

In addition, the type of housing required in order to address the affordable housing need is housing available to core workers (care, education and services – e.g. hospitality) at about 50-60% market rate. Private housing and so called “affordable” housing at 80% market value is not accessible to the vast majority of core workers who are on lower than average salaries (average Surrey salary is around £30 000 pa, which is too low to afford even 25% of shared ownership scheme flat or 80% of the market rent).
As it stands, private housing (even when classified as 'affordable' according to the legal definition) will not be accessible to the majority of local population, even further exacerbating the housing affordability problem.

**Deliverability of the Plan in years 1 – 5**

The Aarons Hill site would require significant enabling works (water supply, sewage, electricity, gas) as it has never been built on before. It is not clear whether delivering 200 homes on the Guildford side of Aarons Hill site within first 5 years of the plan is deliverable. By comparison, the Waverley Land Availability Assessment plans to deliver only 25 homes (out of 262) in the first 5 years of their plan.

**Communities and economic impact**

The development could result in adverse economic and social impact on the local community. The new neighbourhood will bring a significant increase in population of Godalming and the brunt will be carried by Godalming town. It is not clear what employment opportunities are there to cater for this population (see comments on retail industry below).

Increase in elderly population also means new development will have to cater for their specific needs - there is need for accessible and reliable public transport and cater for mobility and health issues, with easy access to GP surgeries and hospital care (there are no nearby GP surgeries or other amenities on site, and GP surgeries in and around Godalming are oversubscribed as it is).

Considering the site is on top of a hill, with only one narrow access road which is frequently congested, and no amenities or doctor surgeries nearby, the site does not cater for elderly or disabled residents even with infrastructure improvements. Emergency vehicle access can also be frequently compromised, especially in winter.

In addition, the elderly need special care services to be available - for which care service providers need staff. There is not enough housing available to core workers such as care workers and nurses as they are priced out of the area. As such - and in absence of key workers housing at 50-60% of market value - the Plan is potentially discriminating against vulnerable population (elderly, disabled) and against core workers on lower incomes.

Significant proportion of businesses in Godalming and surrounding areas are rural businesses (see Waverley BC Economic strategy) which may be adversely impacted by increased road congestion and urbanisation of the area. A significant appeal of the area is its ‘rural character’ and that feature is frequently used for marketing – that would be completely lost with continued urbanisation and is likely to have negative consequences for the local economy.

One important trend to note is that retail industry is in significant decline, with over 39000 retail jobs lost or at risk in 2018 alone ([http://www.retailresearch.org/2018yearofcrisis.php](http://www.retailresearch.org/2018yearofcrisis.php)). This means that the local economy cannot put reliance on retail but needs to find other opportunities to advance the local economy. With significant shift to online purchasing and home delivery, this would also put additional strain on the roads.

The Sustainability analysis does not address these emerging trends, putting the Local Plan at risk of being undeliverable or having detrimental economic consequences for the local area.

The Sustainability assessment also does not take into consideration emerging trends and economic risks and disruption arising from transition to low carbon economy, which has the potential to significantly disrupt the economy at all levels in the next 10-15 years - this period falls well within the period of the Local Plan.

As such, the Community and Economic Sustainability analysis is inadequate to account for emerging economic and social risks of the future.
For all the above reasons, the Main Modifications 2 and 39 relating to Aarons Hill land (Godalming) should be rejected.

Attached documents:

**Comment:** MM39 - LPMM18/4825 **Respondent:** Nina Mileksic 20832321 **Agent:**

Please see my comments on proposed Main Modifications 2 and 39 (Aarons Hill land) which also form the basis for my objection to allocating Aarons Hill land for house building under the local Guildford plan.

**Transport and Traffic**

Sustainability assessment states there is good bus service which is incorrect. The bus service is currently once an hour, with residents reporting the buses frequently get stuck in traffic and often missing out the entire Aarons Hill area as the drivers attempt to cut delays to their schedules.

There is only one access road to the estate (Eashing lane) which is narrow, with steep hill from A3100 junction up to Aarons Hill. Pavements are narrow and unsuitable for elderly, prams or people with mobility constraints, and in places the pavements are a death trap, especially in winter. No traffic calming measures or speed limit enforcement means drivers often speed along the entire stretch of Eashing lane, making it unsafe for pedestrians and cyclists alike.

This would be the only access for emergency vehicles for an estate of well over 1500 people (including Waverley side of the development and existing Aarons Hill estate), which is inadequate. Pairing this up with frequent traffic jams and the narrowness of Eashing lane from A3 to A3100, there is a serious risk that emergency vehicles would not be able to access the new development in a timely manner.

Eashing lane is a narrow country lane, for most of it without any pavements for safe pedestrian use and it is unsafe for cyclists due to sharp corners and excessive speed of many drivers. In most places it is too narrow for a car and a lorry to meet – there have been instances of the road being blocked by a lorry that got stuck for over 20 minutes and needed help of residents to manoeuvre out of Lower Eashing.

**Ecology**

The Waverley side of the field was surveyed by an ecologist as part of the existing planning application for 262 dwellings. Even though the ecology reports significantly downplayed the impact of the development on the environment, it became very clear that the site holds an astounding levels of biodiversity. Some of the protected species identified are listed below:

7 species of bats, one of which is Barbastelle bat, Habitats Directive Annex II protected species and classified as Vulnerable to Extinction. This is an important find and if there is a maternity colony on site, this site could be a good candidate for a Special Area of Conservation. Further investigation is needed to establish the size of Barbastelle population and how they use the site. They can cover wide areas and it would be key to understand if they are present on the Guildford side as well.

There is also potential for Hazel Dormouse to be present and Natural England requested more information to be obtained on this matter.

In addition, the following protected birds were identified to be using the site:

**Birds:**

RSPB red listed due to rapid population decline (as a result of loss of habitat/food sources):

Skylark (Alauda Arvensis),
House Sparrow (*Passer Domesticus*) – also Defra Red listed

Starling (*Sturnus Vulgaris*) – also Defra red listed

Song Thrush (*Turdus philomelos*) - also Biodiversity Action Plan species

RSPB amber listed due to population decline (as a result of loss of habitat/food sources):

Swift (*Apus apus*);

Dunnock (*Prunella modularis*)

Kestrel (*Falco tinnunculus*)

As the ecology reports were of inadequate quality and were downplaying the impact on the environment, it is highly likely that significant omissions of other protected species occurred.

An independent ecology survey of the entire site would be necessary to establish the level of biodiversity overall and the impact of any development on the protected bats, birds and any Hazel Dormice.

Even without an additional survey it is clear this site contains a significant level of biodiversity which - according to the NPPF - should be protected for future generations.

**Climate change**

Recent scientific evidence has shown that climate change can adversely impact two important factors in food production and distribution: weather related events can cause significant disruption to transport infrastructure, and it can reduce crop yields on a global scale, which in turn can cause stress to agriculture industry, in turn causing food insecurity in certain regions and disrupt the food supply chain. On the national/local level, that means that over-reliance on food imports can cause significant concern in terms of food supply. As the instances of severe weather events are likely to occur more frequently, it is important to consider these factors (food production and distribution) in local planning terms.

In the light of the emerging climate risks it would be unwise to continue to build on fertile farmland –the proposed Aarons Hill site is in its entirety a fertile field growing a wide variety of crops.

**Housing Projections**

The latest ONS statistics (published September 2018) and population growth projections based on 2016 data showed significant decline in population growth. This was before the effect of Brexit referendum on immigration showed in the data. The immigration after Brexit referendum has fallen significantly.

According to ONS, the two main factors contributing to population growth are immigration and longevity (birth rates keep declining). As immigration has significantly fallen since June 2016, and life expectancy is stagnating (according to ONS data 2015-2017), the next data set for 2018 is likely to show even more significant decline in population growth.

This puts the current planned housing numbers for Guildford in a very different context, and needs serious consideration.

In addition, the type of housing required in order to address the affordable housing need is housing available to core workers (care, education and services – e.g. hospitality) at about 50-60% market rate. Private housing and so called “affordable” housing at 80% market value is not accessible to the vast majority of core workers who are on lower than average salaries (average Surrey salary is around £30 000 pa, which is too low to afford even 25% of shared ownership scheme flat or 80% of the market rent).

As it stands, private housing (even when classified as 'affordable' according to the legal definition) will not be accessible to the majority of local population, even further exacerbating the housing affordability problem.

**Deliverability of the Plan in years 1 – 5**
The Aarons Hill site would require significant enabling works (water supply, sewage, electricity, gas) as it has never been built on before. It is not clear whether delivering 200 homes on the Guildford side of Aarons Hill site within first 5 years of the plan is deliverable. By comparison, the Waverley Land Availability Assessment plans to deliver only 25 homes (out of 262) in the first 5 years of their plan.

**Communities and economic impact**

The development could result in adverse economic and social impact on the local community. The new neighbourhood will bring a significant increase in population of Godalming and the brunt will be carried by Godalming town. It is not clear what employment opportunities are there to cater for this population (see comments on retail industry below).

Increase in elderly population also means new development will have to cater for their specific needs - there is need for accessible and reliable public transport and cater for mobility and health issues, with easy access to GP surgeries and hospital care (there are no nearby GP surgeries or other amenities on site, and GP surgeries in and around Godalming are oversubscribed as it is).

Considering the site is on top of a hill, with only one narrow access road which is frequently congested, and no amenities or doctor surgeries nearby, the site does not cater for elderly or disabled residents even with infrastructure improvements. Emergency vehicle access can also be frequently compromised, especially in winter.

In addition, the elderly need special care services to be available - for which care service providers need staff. There is not enough housing available to core workers such as care workers and nurses as they are priced out of the area. As such - and in absence of key workers housing at 50-60% of market value - the Plan is potentially discriminating against vulnerable population (elderly, disabled) and against core workers on lower incomes.

Significant proportion of businesses in Godalming and surrounding areas are rural businesses (see Waverley BC Economic strategy) which may be adversely impacted by increased road congestion and urbanisation of the area. A significant appeal of the area is its ‘rural character’ and that feature is frequently used for marketing – that would be completely lost with continued urbanisation and is likely to have negative consequences for the local economy.

One important trend to note is that retail industry is in significant decline, with over 39000 retail jobs lost or at risk in 2018 alone ([http://www.retailresearch.org/2018yearofcrisis.php](http://www.retailresearch.org/2018yearofcrisis.php)). This means that the local economy cannot put reliance on retail but needs to find other opportunities to advance the local economy. With significant shift to online purchasing and home delivery, this would also put additional strain on the roads.

The Sustainability analysis does not address these emerging trends, putting the Local Plan at risk of being undeliverable or having detrimental economic consequences for the local area.

The Sustainability assessment also does not take into consideration emerging trends and economic risks and disruption arising from transition to low carbon economy, which has the potential to significantly disrupt the economy at all levels in the next 10-15 years - this period falls well within the period of the Local Plan.

As such, the Community and Economic Sustainability analysis is inadequate to account for emerging economic and social risks of the future.

For all the above reasons, the Main Modifications 2 and 39 relating to Aarons Hill land (Godalming) should be rejected.

**Attached documents:**
4. MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

Attached documents:

Comment: MM3 - LPMM18/4837 Respondent: Ian Rees 20832993 Agent:

My interest in Guildford is that I was at school in Guildford, grew up in Cranleigh and several times a week I commute through the town, changing trains from the Waterloo line to the Reading line and back. My parents live in Cranleigh and my sister and her family live in Haslemere.

My interests coincide with those of the Guildford Vision Group ie:

1. MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites.

I would add that the damage to the riverside goes back a long way. Photographs in Dapdune Wharf show how the urban riverside was enclosed and privatised during the 19th century. The destruction of classic surrey buildings in Friary Street and construction of ‘The Friary’ shopping centre were disastrous for the character of this part of the town. The decline of retail presents the opportunity to demolish Friary and recover the character of this part of town by reconstruction of historic buildings (from drawings and photographs etc), mindful that the river should become a public space as it last was probably at the end of the 18th century. Alongside this investment in the character of the town any development should be mixed and mindful of the digital knowledge industries that are driving innovation. The university should be encouraged to bring campus buildings into the centre of Guildford and you should resist soulless ‘student housing company’ style blocks. There is much scope for an innovation district by the river as discussed by Brookings (https://www.brookings.edu/innovation-districts/)

2. MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre. I would urge you to consider tunnels as a solution to traffic that is passing ‘through’ Guildford, removing artificial barriers to pedestrians without creating a pedestrianised no go zone for local car traffic. Consider ‘the big dig’ in Boston. Many cities around the world have accomplished this.

3. MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Attached documents:

Comment: MM27 - LPMM18/4869 Respondent: Anna-Louise Clough 20833537 Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

• No recognised assessment has taken place for increased volume of traffic, noise and air pollution.

Attached documents:
**Comment: MM41 - LPMM18/4863  Respondent: Anna-Louise Clough 20833537  Agent:**

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43 on the grounds,**

- Over 7000 objections to previous lower number of homes to be built has been ignored, this is not listening to the voter and tax payer in the area, of which we are many.
- Ancient Woodland cannot be replaced, there have already been unscrupulous activities by land owners in the area, removing Woodland for which they have been find for. The Council cannot replicated the same behavior.
- Development will join Send and Ripley, qualifying as over development.
- Water is already flooding roads in Ripley and Send, as well as private dwellings. Further building and removal of Woodland will increase flooding in the area.
- Infrastructure is not in place to manage the increase of vehicles coming with an increase in home, roads are narrow lanes in the area, not capable of increased volume of traffic. Increased traffic will result in an increasing of idling vehicles, resulting in air pollution for this Green Belt area.
- There is no local School to support additional families now that Ripley School has been run down to such a point it closed.

**Attached documents:**

**Comment: MM41 - LPMM18/4872  Respondent: Anna-Louise Clough 20833537  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

- No recognised assessment has taken place for increased volume of traffic, noise and air pollution.

**Attached documents:**

**Comment: MM42 - LPMM18/4864  Respondent: Anna-Louise Clough 20833537  Agent:**

**MM42 Land at Burnt Common, London Road, Send, Policy A58**

- There is no proven demand for this.
- Being doubled in size of area from original plan is not necessary when Slyfield has unused capacity, this will also bring more large Diesel vehicles into the area, giving air pollution.
- There is currently a reduced need for Industrial areas according to latest research.
- Increased traffic cannot be managed by the village, causing potential gridlock and accidents.

**Attached documents:**

**Comment: MM42 - LPMM18/4873  Respondent: Anna-Louise Clough 20833537  Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

- No recognised assessment has taken place for increased volume of traffic, noise and air pollution.
Comment: MM44 - LPMM18/4865  Respondent: Anna-Louise Clough 20833537  Agent:

MM44 Land at Aldertons Farm, Send Marsh Road Policy A63

- This has already been deleted from an earlier draft.
- This land is ‘green’ belt with no special circumstances, so contradicting policy MM9.
- Narrow surrounding lanes and roads already go to single lane in areas and will not manage an increase in traffic.
- This area is Marsh land, prone to flooding, highlighted in searches, building will increase flooding for existing homes.
- Infrastructure cannot handle an increase in homes by 45%
- Air quality will rapidly deteriorate with increase in vehicles.
- Wildlife in this area will be threatened, Bats, Owls etc.
- A number of historic Oak trees also exist in this area.

Comment: MM48 - LPMM18/4874  Respondent: Anna-Louise Clough 20833537  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

- No recognised assessment has taken place for increased volume of traffic, noise and air pollution.

Comment: MM9 - LPMM18/4862  Respondent: Anna-Louise Clough 20833537  Agent:

Building to increase in the number of homes on Green Belt Land is not what Green Belt Land is protected for. Green Belt Land should remain protected. This is why I chose to but my home in this area.

Comment: MM9 - LPMM18/4866  Respondent: Anna-Louise Clough 20833537  Agent:

MM9 Green Belt Policy

- Green belt is for protecting and should remain so, it is not up for negotiation
I really don’t understand why it is necessary to comment again on these sites.

GBC do not appear to be following a democratic process. There have been over 7000 objections from Send and Ripley which is a very loud and clear message to say GBC have got it wrong. Now we are effectively gagged and can only comment on modifications to proposals which appear to be presented as a ‘done deal’.

I do not feel both my own and those of the many residents I know who all share the same feeling are being listened to and each time a plan is presented it is modified to an even more concentrated plan.

We in Send have expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before.

The opening paragraph to the local plan states

“Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough’s most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, supported by suitable infrastructure including education, healthcare and transport. The new Local Plan will be in place until 2034.”

Furthermore there are signs at various points proclaiming

“The Surrey Hills an area of Outstanding Natural Beauty.”

I am very disappointed with the way the Guildford Plan has been presented. The complete lack of listening to resident’s views, common sense and awareness of the local amenities cannot be understood by anyone and cannot support the proposed plans which GBC seem intent on creating and effectively merging the two villages. Availability of schooling, medical provision and the existing roads between Woking and the main access to the A3 and the M25 already struggle to cope with current numbers and existing staff provision for the facilities already in existence! A national shortage of GPS, Nurses and teachers along with the actual structure building to facilitate medical and schooling requirements will be unable to cope with these proposed plans for potentially several thousand extra residents, children and their cars concentrated in this area.

If 7000 objections does not get the message across then I fail to see what GBC need to get the message that they have these proposals completely wrong.

Attached documents:

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry. There are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.
GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

**Attached documents:**

**Comment:** MM41 - LPMM18/4899  **Respondent:** Nicholas Brown 20834593  **Agent:**

**MM41 Land at Garlicks Arch, Send Marsh, Policy A43**

I Object to the proposal to increase the number of homes on this site from 400 to 550. If anyone were to actually visit the site will see how unsuitable it is.

I object to the number of homes being increased by 37%. With an average of 2 people per house, any number of children, this will mean a possible 1000 plus residents. All these people will require access to the roads and amenities such as schools and medical facilities.

Overwhelming and compelling evidence was presented by various groups at the Council meeting and it was clearly stated how unsuitable this site was. The council’s representatives had few answers to what was said, so the conclusion from the Inspector that the site should be increased not scrapped is very surprising and dis-heartening.

Estimations would be that this is likely to add over 750 additional cars to the traffic in the surrounding area. Access to both Guildford and Woking would add to the massive traffic jams already present at Send Dip and the Burnt Common Roundabout. Send Road is already the main access road between Woking and the M25 carrying heavy goods vehicles and articulated trucks. There is often already a gridlock situation especially at 8am and 5pm, further up in Ripley itself where cars want to turn in and out of Newark lane wanting to get to the A3 and M25 via the access points at either end of the Portsmouth Road.

There is nothing in the Local Plan about additional road infrastructure so the current small roads we currently have which are over-crowded already will simply not be able to cope. If the other proposed sites all go forward then these roads will simply gridlock making life a misery for everyone concerned. There is a serious safety angle to this problem as cars bunch and speed limits are broken to enable to get from A to B on time. The situation will be far worse during weekdays. The additional traffic which will result from the excessive building programme in Send will make the situation far worse.

With the number of additional houses proposed by the plan and the subsequent amendments we are allowed to comment on in this objection, there will inevitably be families requiring schools for their children. There is only now one primary school for the villages of Send and Ripley. Provision for more Primary School places has not been made even with the recent building and upgrade of the school in Send. George Abbot is the nearest secondary school, and for many years the children of Send and Ripley do not get into this school; due to it being over-subscribed. The next nearest school is the Howard of Effingham which currently does not regularly take children from the villages. The same applies to the New Hoe Valley School, and so subsequently primary and secondary school places are also limited requiring exhaustive and time consuming processes for Council and residents, to get places is the closest school to the homes already existing!

There are no plans to build any new schools, surgeries, dentists or amenities.

More houses of this number will obviously mean the current amenities will be over stretched and unable to cope and no plans have been made.

In my opinion this is an irresponsible and ill-conceived site to choose.
All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry. There are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

I object at the proposal now to double the original area proposed; especially in view of the increased capacity at the Send Business Centre and the spare capacity at Slyfield Industrial Estate.

This will also generate additional traffic consisting of vans and larger vehicles which will all travel through the narrow and already busy roads of Send and Ripley. The same reasons already stated in the previous sections are the same. This area already has traffic congestions and will add to further congestion, noise and air pollution.

It will bring safety concerns for local residents and pedestrians in the village who will be using the local recreation ground and need to cross the road.

It will be better to centralise and develop Slyfield Industrial Estate where there is already existing infrastructure and spare capacity.
GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

**Attached documents:**

**Comment:** MM48 - LPMM18/4920  **Respondent:** Nicholas Brown 20834593  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

All of the above proposals will involve a considerable increase of traffic on roads which are already inadequate for the amount of traffic they carry. There are no proposals which will alleviate or improve the situation in the face of the concentration of building activity which seems unfairly to be focussed on Send.

GBC appear to want to merge the villages of Send to Ripley into one and adopt an aggressive building policy which will change them from villages into towns.

There is no improved traffic policy or any plans to upgrade or improve roads or bus routes.

Currently buses run one an hour to Woking and so people are forced to use cars.

**Attached documents:**

**Comment:** MM9 - LPMM18/4903  **Respondent:** Nicholas Brown 20834593  **Agent:**

**MM9 Green Belt Policy**

This can hardly claim to be a policy when the above developments all impinge on the existing Green Belt which GBC seem prepared to sacrifice. Following GBC’s logic, all greenbelt land can be sacrificed **MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

**Object** to the proposal for 120 homes at this location which is a wholly unsuitable development in such an area, and for the same reasons as the other locations in Send - namely excessive pressure on local services and additional traffic on a road system which was never intended for such potential traffic volumes.

The only way in and out of this site is straight onto Send Marsh Road which is unsuitable to carry this amount of extra traffic generated by this many houses. Access either end, at Send Dip and Mays Corner onto Send Road is already very difficult due to the congestion through Send and Ripley and the result will be long traffic jams along Send Marsh Road.

This is prime green belt land and there is no reason to make an exception for housing here when there are other areas outside of the greenbelt or on brownfield sites. GBC do not have any explanation as to the reason for the exception to put this land on greenbelt land for this site.

This is not acceptable.
and therefore is able to be built on. This breaches all GBC’s own policies and government directives.

**Attached documents:**

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**Comment: MM1 - LPMM18/6243  Respondent: Monique Harrison 20834945  Agent:**

The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline “12 years to limit climate change catastrophe” which is within the Plan period. The scientific consensus calls for “urgent and unprecedented changes” to limit the use of fossil fuels. The plan (MM1 S1 and MM24) in no way reflects the urgency or importance called for. The Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy and that best practice towards sustainability is adopted. The crucial omission are policies aimed at reducing car usage which should not only be included in these MMs, but also MM9 (P2 Greenbelt development), MM14 (E2 Employment) and MM5 (H1 Homes for all) limiting private parking

**Attached documents:**

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**Comment: MM14 - LPMM18/6246  Respondent: Monique Harrison 20834945  Agent:**

The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline “12 years to limit climate change catastrophe” which is within the Plan period. The scientific consensus calls for “urgent and unprecedented changes” to limit the use of fossil fuels. The plan (MM1 S1 and MM24) in no way reflects the urgency or importance called for. The Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy and that best practice towards sustainability is adopted. The crucial omission are policies aimed at reducing car usage which should not only be included in these MMs, but also MM9 (P2 Greenbelt development), MM14 (E2 Employment) and MM5 (H1 Homes for all) limiting private parking

**Attached documents:**

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**Comment: MM2 - LPMM18/4922  Respondent: Monique Harrison 20834945  Agent:**

MM2 **The Examination should be re-opened** because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination. It is now possible to limit greenbelt development to the locations where there will be rail links.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined,
Policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority.

The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline “12 years to limit climate change catastrophe” which is within the Plan period. The scientific consensus calls for “urgent and unprecedented changes” to limit the use of fossil fuels. The plan (MM1 S1 and MM24) in no way reflects the urgency or importance called for. The Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy and that best practice towards sustainability is adopted. The crucial omission are policies aimed at reducing car usage which should not only be included in these MMs, but also MM9 (P2 Greenbelt development), MM14 (E2 Employment) and MM5 (H1 Homes for all) limiting private parking.

MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline “12 years to limit climate change catastrophe” which is within the Plan period. The scientific consensus calls for “urgent and unprecedented changes” to limit the use of fossil fuels. The plan (MM1 S1 and MM24) in no way reflects the urgency or importance called for. The Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy and that best practice towards sustainability is adopted. The crucial omission are policies aimed at reducing car usage which should not only be included in these MMs, but also MM9 (P2 Greenbelt development), MM14 (E2 Employment) and MM5 (H1 Homes for all) limiting private parking.

Comment: MM27 - LPMM18/4924   Respondent: Monique Harrison 20834945   Agent:

Comment: MM23 - LPMM18/4925   Respondent: Monique Harrison 20834945   Agent:

Comment: MM24 - LPMM18/6244   Respondent: Monique Harrison 20834945   Agent:

Comment: MM3 - LPMM18/4923   Respondent: Monique Harrison 20834945   Agent:
MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites so that they can be properly masterplanned.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Bland urgings of high-quality development as at present are meaningless. It is not necessary to be prescriptive but so much modern development is mediocre clearer guidelines are required.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. This might include wider pavements, dedicated cycle lanes, lower speed limits but above all reducing single occupancy commuting and ferrying children to school. It is perfectly possible for the council to come up with proposals to address these matters which should be in this plan. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

MM3 There should be a policy (S4) for the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate. Garden grabbing developments are very disruptive. Consents are generally contested and the often long-running uncertainty very unsettling. The construction is particularly intrusive and the ultimate development is generally substandard. There should be a presumption against this other than in exceptional circumstances such as where the additional house cant be self-contained with its own highway access.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

Attached documents:

Comment: MM5 - LPMM18/6247 Respondent: Monique Harrison 20834945 Agent:

The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline “12 years to limit climate change catastrophe” which is within the Plan period. The scientific consensus calls for “urgent and unprecedented changes” to limit the use of fossil fuels. The plan (MM1 S1 and MM24) in no way reflects the urgency or importance called for. The Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy and that best practice towards sustainability is adopted. The crucial omission are policies aimed at reducing car usage which should not only be included in these MMs, but also MM9 (P2 Greenbelt development), MM14 (E2 Employment) and MM5 (H1 Homes for all) limiting private parking.

Attached documents:

Comment: MM9 - LPMM18/6245 Respondent: Monique Harrison 20834945 Agent:

The UN Intergovernmental Panel on Climate Change (IPCC) Report was published on 8 October under the headline “12 years to limit climate change catastrophe” which is within the Plan period. The scientific consensus calls for “urgent and unprecedented changes” to limit the use of fossil fuels. The plan (MM1 S1 and MM24) in no way reflects the urgency or importance called for. The Inspector should reopen the examination to ensure that these latest findings are incorporated into the plan philosophy and that best practice towards sustainability is adopted. The crucial omission are policies aimed at reducing car usage which should not only be included in these MMs, but also MM9 (P2 Greenbelt development), MM14 (E2 Employment) and MM5 (H1 Homes for all) limiting private parking.

Attached documents:
Comment: MM13 - LPMM18/4947  Respondent: C Davies 20835105  Agent:

MM13

More sustainable housing should be allocated in the town centre rather than retail outlets

Attached documents:

Comment: MM2 - LPMM18/4945  Respondent: C Davies 20835105  Agent:

I am writing to register objections to the latest consultation on the Local plan, despite not being advised about the consultation even though I have previously commented.

It appears to me that there are NO exceptional circumstances for removing the villages from the Green Belt due to the latest figures produced by the ONS. GBC have not stated what the Special Circumstances are for the Insetting of the local villages.

MM2

As a result the new ONS figures the public examination should be re-opened to take these into account together with the household projections. The new figure indicates that only 360 extra homes per year are needed NOT the 630 proposed, not including the extra houses from Woking. This figure could be covered with Town Centre development and the use of Brownfield sites with no need to touch the Green Belt. This is detailed in the spatial strategy which requires that development should be in the town centre first and the Brownfield before moving out to land in the Green Belt and Villages

The addition of 500 houses in Send would have a huge impact on traffic and cause huge congestion in the surrounding areas and the effect of this proposed development has not been considered

There should no requirement to take the unmet housing need from Woking

Attached documents:

Comment: MM3 - LPMM18/4949  Respondent: C Davies 20835105  Agent:

S3

The town centre policy is inadequate and does not address the infrastructure deficit

Attached documents:

Comment: MM37 - LPMM18/4951  Respondent: C Davies 20835105  Agent:

MM37

There is no justification for altering the SNCI boundary
The SNCI size is drastically reduced despite the whole site qualifying on ecological grounds
The biodiversity of the SNCI will be destroyed by the proposed development

I support the representation made by WAG, advised by Richard Harwood.

**Attached documents:**

---

**Comment:** MM40 - LPMM18/4950  **Respondent:** C Davies 20835105  **Agent:**

**A35 - THREE FARMS MEADOWS**
This site should not still be in the Local Plan
The addition of land to the south of the appeal site does NOT mitigate the issue of density as a lot of the 'new' land is constrained by the VOR
Land to the south abuts the Ockham Conservation area and increases the visibility of the site from the Surrey Hills Area of Outstanding Natural Beauty

**Attached documents:**

---

**Comment:** MM41 - LPMM18/4948  **Respondent:** C Davies 20835105  **Agent:**

**MM41**
The transport strategy relies on inadequate modelling.
The Junction 10/A3 scheme delays from Highways England would impact all the schemes that are due to rely on it. Notably these include A35 - Three Farms Meadows, A43 Garlick's Arch and the newly introduced site of Aldertons Farm in Send. This has been put in via the back door after previously being discounted and would have a huge impact on the surrounding area.

Improvements to the A3 are under the control of Highways England and not GBC and there are no fixed plans for timescales and therefore cannot be relied upon for this Plan

**Attached documents:**

---

**Comment:** MM9 - LPMM18/4946  **Respondent:** C Davies 20835105  **Agent:**

**MM9**
Infilling in and around the villages would result in the countryside protection being weakened

**Attached documents:**

---

**Comment:** MM2 - LPMM18/4995  **Respondent:** Guildford Housing Forum 20836193  **Agent:**

**1.0 Instructions and Introduction**
1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by the Guildford Housing Forum (“the Forum”) to prepare and submit representations in relation to the schedule of Main Modifications proposed by Guildford Borough Council (“the Council”) to the Guildford Borough Local Plan 2018 (“the Plan”).

1.2 These representations have been prepared with input from RPS in respect of the 2016 based Household Projections and should also be read in conjunction with the Evidence presented on behalf of the Forum in the Matters statements and oral submissions made at the Examination.

1.3 This document covers the following matters:

• Section 2 Representations on the Main Modifications
• Section 3 Representations on the 2016 based Household Projections
• Section 4 Areas where further Modifications are required in order for the Plan to be found Sound

1.4 As with the Evidence submitted in the Matters Statements and oral submissions made at the Examination individual Forum Members will be submitting their own separate representations dealing with strategy-specific or site-specific issues.

1.5 The relevant Main Modification references are identified at the appropriate points within this document.

2.0 Representations on Main Modifications

2.1 This section of the representations sets out the Forum’s views on the various Main Modifications proposed by the Council to the Plan.

(i) Housing Requirement including Unmet Need

MM2 – Policy S2:

2.2 The proposed change to the minimum housing requirement in the Plan to bring this into line with the interim recommendations of the Inspector is supported by the Forum. The figure of 630 dpa as a minimum housing requirement is reflective of the recommendation made by the Inspector.

2.3 The Inspector also recommended that Guildford should take 25% of the total unmet need arising from Woking over the Plan period. The Council has equated this to be an additional 42 dpa. The Inspector’s note ID-006 calculated a total housing requirement of 671 dpa (630 dpa + 41 dpa), but the Forum understands from Officers that the Council has now agreed a figure of 672 dpa with the Inspector. The remainder of these representations therefore work on the basis of the Council’s figure of 672 dpa.

2.4 In the Forum’s view the additional 42 dpa should be provided for over the whole of the Plan period and from the start of that period. By contrast the Council is seeking only to introduce the unmet need component from 01 April 2019 i.e. the first monitoring year after the Plan is to be adopted. This cannot be right for the following reasons:

2.4.1 **Reason 1** – The unmet need arising from Woking already existed at the start of the Plan period. The need does not simply vanish as a result of the Council only choosing to apply an allowance from 01 April 2019;

2.4.2 **Reason 2** – At the Examination hearing session dealing with this issue the Forum accepted (albeit informally) that the unmet need allowance could legitimately commence from 01 April 2019 but only in the event that the need arising in the first 4 years of the Plan period was then accounted for in the remaining 15 years of the Plan period. This approach has not been applied by the Council in its Main Modifications. Consequently there is an element of unmet need arising from Woking that will never be provided for;

2.4.3 **Reason 3** – In terms of consistency of approach across the HMA the unmet need should be planned for from the start of the Plan period. This approach was applied in Waverley and indeed the representatives from Waverley Borough Council made this point at the relevant Examination hearing session; and,
2.4.4 **Reason 4** – By Guildford taking 25% of Woking’s unmet need and Waverley taking 50% this leaves a balance of 25% that is not being planned for across the HMA. This places even greater emphasis on the 25% in Guildford being properly provided for and not discounted further, which is the practical effect of the approach the Council is now taking.

2.5 In the Forum’s view the housing requirement should be 672 dpa taking account of the factors that were clearly set out by the Inspector at the ‘wash up’ session immediately before the close of the Examination hearing sessions and identified in ID-005 and ID-006 and the position the Council has subsequently agreed with the Inspector.

2.6 This figure should be applied on a uniform basis from the start of the Plan period.

2.7 If the view was taken by the Inspector that the unmet need component should only commence from the first monitoring year after the adoption of the Local Plan i.e. from 01 April 2019 then the resultant annualised figure should reflect the fact that the unmet need arises from the start of the Plan period and not from 01 April 2019.

2.8 This is particularly important bearing in mind the fact that a) the housing requirement is expressed as a minimum and b) not all of the unmet need arising from Woking will in fact be met within the HMA. Given that this is directly at odds with Government policy that requires the housing need for the HMA to be met in full, it is vitally important that the housing requirement figure (inclusive of the unmet need component) is not watered down.

(ii) **Housing Trajectory**

**MM2 – Policy S2:**

**MM39, 41, 44, 45 – Additional Allocations:**

**MM46 – New Housing Trajectory:**

2.9 One of the key interim findings from the Examination hearing sessions was the fact that the Council’s housing delivery strategy and in turn the Housing Trajectory (now set out at Appendix 0 of the Plan) was flawed and that further delivery is urgently required in the early years of the Plan period.

2.10 The Inspector consequently directed the Council to address its short term supply problem to ensure the housing delivery strategy and in turn the housing trajectory would represent a robust position for the Plan going forward in terms of 5-year housing land supply.

2.11 In the Forum’s view the Main Modifications advanced by the Council do not address the short term delivery issue at all.

2.12 The allocations now proposed all comprise greenfield Green Belt releases that are entirely dependent on the adoption of the Plan before they can proceed. The Council has not explored any of the other early delivery options put forward by the Forum and other parties at the Examination to address the early delivery issue.

2.13 Equally the Council has not addressed through further evidence (beyond the limited rebuttal provided verbally at the Examination hearing sessions) how the deficiencies in the housing trajectory that were identified by the Forum and others have been addressed. In short the Council has simply ignored this matter and retains the majority of its delivery trajectory for each supply source without any modification.

2.14 The only notable exceptions to this are the changes to the following supply sources:

2.14.1 **Villages in the Green Belt1** – This component of supply has actually reduced by 20 dwellings from 272 down to 252. The reduction worsens the supply position when compared with that presented at the Examination hearing sessions and upon which the Inspector identified an early delivery problem.

footnote: 1 When compared with the Trajectory presented in GBC-LPSS-020

2.14.2 **PDL in the Green Belt2** - The same applies with this component of supply, which has reduced by 150 dwellings from 345 down to 195. Again this worsens the position presented to the Inspector thereby increasing the gap between early delivery and requirement.
2.15 With regard to Wisley the Forum’s position on the delivery trajectory set out by the Council in GBC-LPSS-020 needs to be updated. Whilst the Forum did not take issue with the delivery trajectory for this site in its evidence presented in the Matters Statements and orally at the hearing sessions, the Forum position was predicated on the Appeal being allowed and planning permission being granted by the Secretary of State. This did not happen.

2.16 On this basis the Forum position on the delivery trajectory for Wisley is updated as set out below to take account of the fact that the lead in to first completions must now be delayed by at least 2 years. The 2 year period is necessary to allow for the progression of a new outline planning application followed by first phase reserved matters before proceeding into the discharge of conditions and initial infrastructure and site set up. This timetable is in line with the empirical evidence contained in the Lichfields study – Start to Finish:

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2.17 The affect of the approach taken by the Council now, even if the Council’s figures are accepted in their entirety, is that the housing trajectory will ‘bump along the bottom’ in 5-year supply terms only exceeding 6 years supply in 2026.

2.18 In the Forum’s view a more realistic position is conveyed in the Forum trajectory attached at Appendix 1. This demonstrates that even with the addition of the sites proposed by the Council in the Main Modifications the Trajectory still fails to maintain a 5-year supply. In fact a further 557 dwellings are required at the start of the Plan period for the Council to break even and achieve a 5-year supply. This applies even if a step is included in the trajectory for the initial 4 year period 2015 – 2019.

2.19 Without further allocations beyond those already proposed by the Council the Plan will fail early in the Plan period.

footnote: 2 When compared with the Trajectory presented in GBC-LPSS-020
3 See Forum Matters 4 and 5 Statements
4 NLP – Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? – November 2016

(iii) 5-Year Housing Land Supply
(By reference to new Framework Deliverability test)

2.20 As demonstrated by the Forum trajectory it is clear that the Council will be unable to demonstrate a 5-year supply at any point during the Plan period. This cannot be considered to comprise a sound Plan. Further allocations are therefore necessary to address the situation and ensure a robust Plan going forward that can maintain a rolling 5-year supply of deliverable housing sites in accordance with the requirements of the Framework 2012.

2.21 Even if the Council’s position on its delivery sources is to be taken at face value it is important to have regard to the new deliverability test set out in Annex 2 of the Framework 2018. Whilst the new deliverability test is not directly applicable to the consideration of the housing trajectory in the context of this Examination, given that the Plan is to be considered in the context of the Framework 2012, the Council’s ability to demonstrate a 5-year supply moving forward will be tested against the new deliverability test.

2.22 That being the case it is important to determine whether the Council’s supply sources are capable of meeting the new deliverability test. This is particularly important for those sites that are proposed to be allocated and also those sites that are subject of outline consents. The Council should therefore satisfy itself and the Inspector that it can provide clear evidence of deliverability in order to ensure the new test can be met during the early years of the Plan period.

(iv) Adequacy of Evidence Base and SA Update
2.23 The Council has produced a SA Update and HRA Addendum, which together comprise the only updates to the evidence base underpinning the Main Modifications.

2.24 The SA Update explains the objective is to identify a further 550 dwellings5 to address the shortfall in the early years delivery within the Plan. The document then goes on to consider alternatives before concluding on a chosen option. The Forum is concerned that the SA Update only appears to test the approach set out in GBC-LPSS-020 i.e. the document is a retrofit appraisal of a note prepared in haste by the Council during the course of the Examination hearing sessions. It does not therefore properly consider all reasonable alternatives and cannot as a consequence be considered to comprise a robust evidence base to underpin the chosen approach.

footnote 5 Paragraph 4.1.4 of the SA Addendum – September 2018 – GBC-LPSS-028a

2.25 Equally the HRA Addendum is focussed on the same limited parameters.

2.26 Beyond the above two documents what is perhaps of greater concern is the fact the Council has not sought to update any of the other key evidence base documents, namely:

• Green Belt and Countryside Study
• Strategic Flood Risk Assessment
• Infrastructure Delivery Plan
• Transport Strategy

2.27 Without updates to the above key components of the evidence base the Council cannot possibly state that the housing delivery option chosen represents the most appropriate and sustainable option. In turn the Inspector will not have sufficient evidence to be able to determine whether the additional allocations comprise a sound strategy. This is particularly the case given that all of the new allocations (with the exception of the Garlick’s Arch site in Send) comprise new Green Belt releases that have not been considered and tested through the Green Belt and Countryside Study.

3.0 Representations on 2016 based Household Projections

3.1 The Inspector’s note ID-10 invited the Council to consider the 2016 based household projections and the implications on the OAN.

3.2 On behalf of the Forum RPS has also considered the 2016 based household projections and the implications on the OAN, which are set out in the note attached at Appendix 2.

3.3 In summary the RPS note concludes that The 2016 SNHP raised a number of uncertainties which are clearly not appropriate for plan making and should not be aligned with the standard method. It is also based on short-term growth trends and not compatible with the Government’s ambitious target of delivering 300,000 homes per year. As such, greater weight should be given to the modelled sensitivity analysis based on the 2014 SNHP figure of 671 dpa identified in the Note (ID-006).

3.4 As set out in Section 2 above these representations have been based on a figure of 672 dpa, which the Forum understands has been agreed between the Council and the Inspector as part of the preparation of the Main Modifications.

4.0 Areas Where Further Modifications Are Required

4.1 In order for the Plan to be found Sound the Forum considers the following further modifications are required:

1. The Council should allocate at least a further 557 dwellings on sites that can deliver early in the Plan period in order to ensure a robust housing delivery trajectory; and,

2. The evidence base should be properly updated to support the proposed additional allocations and provide the Inspector with the evidence required to be able to determine the soundness of the Plan as modified.
4.2 The Council should also satisfy itself and the Inspector that the sources of supply identified in the housing delivery strategy are capable of meeting the new deliverability test set out in Annex 2 of the Framework 2018 to ensure that future assessments of housing supply are robust, particularly in the early years of the Plan period.

4.3 In the context of the 2016 based household projections and for the purposes of the Plan the housing requirement figure of 672 dpa should remain.

Attached documents:  Guildford Housing Forum Rep_Redacted.pdf (983 KB)

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**Comment:** MM41 - LPMM18/4988  **Respondent:** Alison Johnson 20836225  **Agent:**

Objection to development on Site MM41 at Garlicks Arch, Send Marsh, Policy A43

I wish to draw to attention my continued objection to this plan on the grounds that this is a development that is totally out of character to the village and which has totally ignored the previous 7000 objections that have been put forward to the council in previous consultations. The number of houses have increased by 37% and it has been proved that this is an excessive amount and not in line with predicted needs. I was amazed to read in the local paper that this also includes a provision for the local Borough of Woking as well! Building on the Green Belt and destroying an area of ancient woodland is an irreversible decision that can be avoided by first building on brownfield sites that are available within the borough. Joining up the villages of Ripley and Send will destroy the idea of Guildford being surrounded by individual villages and constitute over development. This area often becomes gridlocked when there are even minor incidents on the A 3 or M25 and the addition of over 800 cars will make this situation worse. Even if improvements are made to the A3 and M25, once the cars get onto the small country lanes in the area problems will arise. Already schools and medical facilities as well as parking in the village are strained and this will only exasperate the situation.

Attached documents:

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**Comment:** MM42 - LPMM18/4989  **Respondent:** Alison Johnson 20836225  **Agent:**

Objection to development on Site MM42 Land at Burnt Common, London Road, Send Policy A58

I object to the increase of land for industrial use at this site which is totally unrealistic in a village setting and will increase the traffic and nitrogen dioxide levels in the area. There are no proven demands for this development when the Slyfield site is under used and this will destroy the Green Belt.

Attached documents:

---

**Comment:** MM9 - LPMM18/4990  **Respondent:** Alison Johnson 20836225  **Agent:**

Objection to MM9, Green Belt Policy

Picking off areas of Green Belt at the edges of villages with a subjective test that allows limited infilling will surely destroy what is the life-blood of this area, it’s green spaces and proximity to the Surrey Hills. This is obviously an approach to open up this area to developers at the expense of the resident’s way of life.
### Response to the modified local plan

The Local Plan is unsound for the following reasons:

1. Policy S2. Guildford Borough Council have placed considerable reliance on improvements to the A3 to enable their allocation of development. Such reliance is beyond the council’s control.
2. Policy S2. The recent ONS report regarding the housing requirement throughout the country should lead to the plan reflecting the latest projections. The public hearing should be re-opened to allow re-examination.
3. Policy S2. Surrey University continues to build accommodation beyond the extent of the campus. All future development should take place within its boundaries.
4. Policy S2. The grounds for green belt development are inadequate as the plan fails both to fully exploit the Town Centre brownfield opportunities and the infrastructure deficit.

### Attached documents:

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/5015</th>
<th>Respondent: P T &amp; D M Kelly 20836929</th>
<th>Agent:</th>
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</table>

1. Policy D1. Guildford Borough Council as a major landowner in the Town Centre must accept the same obligations as the other strategic site owners by the Council as planning authority.

### Attached documents:

<table>
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<tr>
<th>Comment: MM23 - LPMM18/5017</th>
<th>Respondent: P T &amp; D M Kelly 20836929</th>
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1. Policy S3. Guildford Borough Council are expected to deliver coordinated results. This requires an effective local plan which includes a Town Centre Masterplan. The Town Centre must be designated a strategic site or sites. In addition development rules are required to ensure quality of development across the Town Centre.

### Attached documents:

<table>
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<tr>
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<th>Respondent: Mr Chris Britton 20839361</th>
<th>Agent:</th>
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1. Policy S3. Guildford Borough Council are expected to deliver coordinated results. This requires an effective local plan which includes a Town Centre Masterplan. The Town Centre must be designated a strategic site or sites. In addition development rules are required to ensure quality of development across the Town Centre.
As someone who lived in Guildford for almost 30 years, ran a business in the town, and still have my social life, church and shopping centred in Guildford, I have taken an interest in the new Local Plan and am very concerned at its current state, and believe the Main Modifications put forward **do not make the Plan sound**. This particularly applies to MM3 and MM23. My main concerns are;

- The Spatial Strategy does not grasp the opportunity to maximise the use of brownfield land in the town centre, which ends up resulting in unacceptable and unsustainable allocation of greenfield sites on the margins.

- The lack of a proper vision (masterplan) for the town centre means the whole Plan is back-to-front; if there was a proper masterplan in place for the central areas, and the associated infrastructure investment, then subsequent allocation of sites for housing and mixed use can be put in the right places, minimising sacrifice of greenfield development.

- Quality of the urban environment. I agree with the Inspector that, with the exception of the High Street, central Guildford is a disgrace - abandoned derelict sites, eye sore car parks, roads and footways in appalling condition, inconsistent use of lighting, street furniture and signs etc. which are of mixed quality and lack a cohesion in design. This should be corrected in a proper town centre design and masterplan policies.

- Transport; everyone knows that road traffic is the bane of the lives of residents, visitors, businesses alike, and no 'tinkering at the edges' or provision of more buses and one or two disjointed cycle lanes will solve the problem. Neither is relying on delivery by Highways England of some (yet to be agreed) improvements in the A3 a viable way out. The 'Solum' development of the station site is a travesty and misses the ideal opportunity to use that space creatively for improving the lot of rail travellers, and creating better connectivity between West and East sides of the town. The Borough Council should be brave and bold and go for radical transport solutions.

**Attached documents:**

---

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**Attached documents:**
Dear Local Planning Officer.

I am writing to reject the proposed housing development in Glaziers Lane, with a large proportion being affordable housing.

I have lived in Normandy since the age of one; I am now 25yrs old. There is nothing affordable about living in Normandy. There are no local shops within walking distance, you have to use your own transport or expensive public transport, or use the internet for home delivery. You must have a vehicle to live in Normandy if you want some kind of life and social life.

With the potential of 105 houses being built will cause mayhem in Glaziers Lane. We already have Tunnel Hill trucks banging and crashing along the lane plus the ex-large vehicles going to and from Backhursts. I have noticed that Wanborough Rail Bridge has developed a large ridge in the top. This has been caused by the compression of heavy trucks and local traffic. Our roads in Normandy and Wanborough are not fit to accommodate this amount of extra housing in one area. We are constantly being used as a rat run when the A31 is congested leading onto the A3.

With most development projects they come with added bonuses; this development comes with nothing. It’s just going to put a huge strain on our roads, no extra funding for a doctor to accommodate extra patients. I understand that our sewage system is at maximum capacity.

This proposal of using ‘Green belt’ land is highly damaging to the meaning and laws of ‘Green Belt’. If we were to pass this small area of land over to mass development then we have opened the flood gates on every piece of ‘green belt’ land within Normandy, Guildford, Surrey and the whole of the UK. It needs to stop. I believe there are ‘brown field’ sites within Guildford that have been flagged up for possible development, but these sites are not cost effective. I’m sorry but that’s no excuse for not developing those sites. We need to protect our green spaces in Surrey. The more I listen to the news and hear how mental health and obesity is on the increase in the young and older generations. Having green spaces has been proven to help the recovery of depression.

Talking from experience the field and pond in question is a beautiful place to spend an hour or two exploring and enjoying the wildlife that use it as their home. Please don’t destroy this wildlife sanctuary.

Attached documents:

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To whom it may concern:

Thank you for this opportunity to comment further on your emerging Local Plan for Guildford Borough. Please consider these comments as both those of Surrey Wildlife Trust and the Surrey Nature Partnership, unless clearly indicated otherwise(*). The Surrey Wildlife Trust last commented on this matter in July 2017. The Surrey Nature Partnership is the government-mandated Local Nature Partnership for Surrey.

Policy S1.

Paragraph 4.1.4. The purpose of these modifications (from the previously consulted draft) appears to reflect changes to the National Planning Policy Framework revised in July 2018. If this is the case the list of features relevant to Guildford...
to which the presumption (in favour of sustainable development) will not automatically apply is not complete; ‘irreplaceable habitats’ have been omitted.

Attached documents:

Comment: MM29 - LPMM18/5053  Respondent: Surrey Nature Partnership (Mike Waite) 20840961  Agent:

Policy ID4: Green and blue infrastructure.

Policy (2); The modification here is not supported and it is recommended you revert back to the former draft; “Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity.” We also now recommend that the former qualifier “...where possible” is removed to anticipate inevitable future revision to reflect the revised National Planning Policy Framework (July 2018). The use of ‘net’ in respect of biodiversity gains is extremely important and we recommend this not simply to be consistent with the NPPF. ‘Biodiversity net gain’ represents an emerging, robustly quantified ecological impact compensation approach that is predicted to become widely adopted under the direction of Defra and Natural England. Moreover current guidance on Biodiversity net gain is cited in your Key Evidence for this policy.

(5); Redrafting here is supported.

(7); Redrafting here is supported.

Paragraph 4.6.42 & 4.6.45 (and Monitoring Indicators). It is recommended the word ‘net’ is replaced throughout for reasons stated above.

Paragraph 4.6.48 (inc. a-b). Redrafting here is supported.

Attached documents:

Comment: MM29 - LPMM18/5064  Respondent: Surrey Nature Partnership (Mike Waite) 20840961  Agent:

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**Paragraph 4.6.48 (inc. a-b). Redrafting here is supported.**

**Attached documents:**

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<td>• I object that to the proposal that Send should have to meet the unmet need arising from Woking Borough Council in addition to what had already been proposed. This additional requirement could and should be absorbed by the increased use of brown field sites within Guildford itself.</td>
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<th>Comment: MM27 - LPMM18/5117</th>
<th>Respondent: Richard Smith 20841889</th>
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<td>• The stated policy states at MM40 (23) “Create unique places that combine the highest standards of good urban design with well designed streets and spaces”. This is not affordable housing, but rather a developers’ charter</td>
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for high end housing, which I strongly object to on the grounds that more expensive housing is simply not required.

- It also sounds as if a major redevelopment will be required at the Ripley wastewater treatment works if it is to “ensure that sufficient capacity is available within Ripley wastewater treatment works to accept wastewater from this development within its permitted limits”. This again will create a blight on the peaceful enjoyment of life for the existing residents of both Send and Ripley.

**Attached documents:**

**Comment:** MM41 - LPMM18/5112  **Respondent:** Richard Smith 20841889  **Agent:**

**MM41 – Land at Garlicks Arch, Sendmarsh, Policy A43**

- This land is presently designated as Green Belt and contains ancient woodland. Once developed, that is gone forever and an essential part of the boundaries between the villages of Send and Ripley will have been removed.

- Once developed, it will significantly increase the number of vehicles using village roads to an intolerable level. Together with the proposed developments to the North and South of Ripley and Send and the proposed development at Alderton’s Farm (MM44), the junction between Sendmarsh Road and the Portsmouth Road will become a major traffic problem as envisaged in MM41 (0e). There is no amount of mitigation that is going to resolve the “adverse material impacts on communities and the environment”. The existing communities and the local environment will simply be destroyed.

- With the closure of the local primary school in Ripley, the limited size of Send First School and the distance to other schools, there will be a considerable increase in the number of parents forced to drive to take their children to school. The idea that they will be able to walk or cycle to these schools is laughable.

- There are presently sufficient medical facilities for the existing population of Send and Ripley but no more. There would need to be a major investment in medical facilities to cope with both the aging local population and the proposed additional homes to be built, which does not appear to have been provided for in the proposal to increase the number of homes from 400 to 550.

- An increase in the number of houses proposed of 37% is clearly excessive and represents an attempt to meet unproven targets for the number of new homes required. There is not currently a local demand for these homes, which are being imposed on the local residents of these villages.

- The site is prone to flooding and therefore the additional homes will simply concrete and tarmac over the natural water run-off and create problems elsewhere as is so often the case when low lying sites are developed in this manner.

**Attached documents:**

**Comment:** MM41 - LPMM18/5118  **Respondent:** Richard Smith 20841889  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**

- I strongly object to the proposed transport strategy, which contains fine words but no solution to the traffic chaos that will result as a consequence of the proposed developments at Garlicks Arch, Burnt Common, Clockbarn and Alderton’s Farm together with Wisley/Ockham and Gosden Hill.

- The existing M25 junction is unable to cope with current demands and needs to be redeveloped just to satisfy this demand. The proposed redevelopment will resolve the existing problem only and is very unlikely to be sufficient to meet the demands created by the proposed developments listed above in aggregate.
• The A3 already backs up to the Clandon slip roads during the rush hour due to the lack of a ring road or other credible alternative for traffic travelling through Guildford. The Portsmouth Road passing through the historic and beautiful village of Ripley is already a nightmare to join or cross during the rush hour due to the number of cars using the old A3 through Ripley as a work around for the congestion on the A3 backing up from the M25 and the number of cars using the village roads to provide a link between Woking and Guildford already. The proposals will simply make these problems worse by adding more traffic than the proposed Transport Strategy will solve.

• The significant increase in traffic will impact greatly on Send Barns Lane, Send Road, Ripley High Street, causing considerable delays, excessive pollution and gridlock. The suggested improvements will condemn the local population and many other travellers to months, if not years, of misery while they are being implemented, all to meet a demand which appears to be the invention of local politicians seeking to increase their fiefdom and unsustainable Government policies on immigration.

Attached documents:

Comment: MM42 - LPMM18/5113  Respondent: Richard Smith 20841889  Agent:

MM42 – Land at Burnt Common, London Road, Send, Policy A58

• I strongly object to the proposed increase from 7,000 to a minimum of 14,800 sq. m of industrial and storage on this site, which was deleted from the 2014 plan because of the number of objections and has since been increased twice.

• There is no evidence that a new industrial site of the proposed size is either required or necessary (the Employment Land Needs Assessment showed a reduction in demand) and, if there was any local requirement for increased industrial and storage facilities, there is more than adequate capacity at the Slyfield industrial site.

• Once again, the land proposed for this unnecessary development is in the Green Belt whereas the Slyfield industrial estate is not. There are no special circumstances warranting an industrial site in the Green Belt and so this also contradicts MM9.

• The proposed increase in industrial and storage capacity in addition to the 25% increase at Send Business Centre will create a much larger concentration of industrial and storage facilities in Send than in any other village. Is this really appropriate for a Green Belt village?

• Once again, the concentration of traffic this will generate at both the morning and evening rush hour periods, as well as the continual flow of delivery vans in and out of the storage facilities is unimaginable, but will certainly end up in gridlock at peak periods. With the exception of the old Portsmouth Road, the rest of the infrastructure required has to be carved out of village roads!

• The resulting effect on Nitrogen Dioxide levels will be horrific and the present members of the Council will rightly be held to account for allowing this in due course.

Attached documents:

Comment: MM42 - LPMM18/5119  Respondent: Richard Smith 20841889  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

• I strongly object to the proposed transport strategy, which contains fine words but no solution to the traffic chaos that will result as a consequence of the proposed developments at Garlicks Arch, Burnt Common, Clockbarn and Alderton’s Farm together with Wisley/Ockham and Gosden Hill.
The existing M25 junction is unable to cope with current demands and needs to be redeveloped just to satisfy this demand. The proposed redevelopment will resolve the existing problem only and is very unlikely to be sufficient to meet the demands created by the proposed developments listed above in aggregate.

The A3 already backs up to the Clandon slip roads during the rush hour due to the lack of a ring road or other credible alternative for traffic travelling through Guildford. The Portsmouth Road passing through the historic and beautiful village of Ripley is already a nightmare to join or cross during the rush hour due both to the number of cars using the old A3 through Ripley as a work around for the congestion on the A3 backing up from the M25 and the number of cars using the village roads to provide a link between Woking and Guildford already. The proposals will simply make these problems worse by adding more traffic than the proposed Transport Strategy will solve.

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Attached documents:

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**Comment:** MM44 - LPMM18/5115  **Respondent:** Richard Smith 20841889  **Agent:**

**MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63**

- I strongly object to the proposed development of 120 homes on this site, which proposal was deleted from an earlier draft due to the number of objections raised.
- Once again, this is a Green Belt site with no special circumstances and so it contradicts policy MM9.
- Once developed, it will significantly increase the number of vehicles using village roads to an intolerable level. Together with the proposed developments to the North and South of Ripley and Send and the proposed development at Garlicks Arch (MM41), the junctions between Sendmarsh Road and the Portsmouth Road and at the Send crossroads will become major points of congestion as envisaged in MM41 (0e). There is no amount of mitigation that is going to resolve the “adverse material impacts on communities and the environment”. The existing communities and the local environment will simply be destroyed.
- The “sensitive design” suggested is presumably an acknowledgement to the number of listed properties and to the beauty of Send Marsh Green. This of course will make the new houses unaffordable to all but the wealthy, while destroying the essential beauty of Send Marsh Green.
- The opportunities suggested in Policy A63 of “green corridors and linkages to habitats outside of the site” and “encourage connections with services and facilities in the village” are exactly the opportunities that will either be lost by the new development or strained to breaking point.
- It will remove an important natural corridor between Send and Send Marsh.
- Together with the proposed sites at Garlicks Arch, Clockbarn and Winds Ridge, it adds 770 houses to the 1,700 currently in Send, representing an increase of 45%. Apart from being far too much for the area’s infrastructure, this is an excessive amount of development for one small Green Belt village.

**Attached documents:**

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**Comment:** MM48 - LPMM18/5120  **Respondent:** Richard Smith 20841889  **Agent:**

**MM27 MM41 MM42 and MM48 Transport Strategy**
• I strongly object to the proposed transport strategy, which contains fine words but no solution to the traffic chaos that will result as a consequence of the proposed developments at Garlicks Arch, Burnt Common, Clockbarn and Alderton’s Farm together with Wisley/Ockham and Gosden Hill.
• The existing M25 junction is unable to cope with current demands and needs to be redeveloped just to satisfy this demand. The proposed redevelopment will resolve the existing problem only and is very unlikely to be sufficient to meet the demands created by the proposed developments listed above in aggregate.
• The A3 already backs up to the Clandon slip roads during the rush hour due to the lack of a ring road or other credible alternative for traffic travelling through Guildford. The Portsmouth Road passing through the historic and beautiful village of Ripley is already a nightmare to join or cross during the rush hour due both to the number of cars using the old A3 through Ripley as a work around for the congestion on the A3 backing up from the M25 and the number of cars using the village roads to provide a link between Woking and Guildford already. The proposals will simply make these problems worse by adding more traffic than the proposed Transport Strategy will solve.
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Attached documents:

**Comment: MM5 - LPMM18/5122**  **Respondent: Richard Smith 20841889**  **Agent:**

MM5

• I understand that some provision has to be made to meet the needs of Gypsies, Travellers and Travelling Showpeople, but once again the assessed needs, as apparently demonstrated through the TAA (2017) findings are unproven and unrealistic. Where are all these people coming from and will provision be made so that we can all join them to obtain free accommodation in due course?

Attached documents:

**Comment: MM9 - LPMM18/5116**  **Respondent: Richard Smith 20841889**  **Agent:**

MM9 Green Belt Policy

• I strongly object to the Green Belt being used for development, which I understand is not Government Policy, and particularly so when there is an unproven demand for this level of development and other sites and places that could be developed without forever destroying our precious Green Belt for future generations.
• Although ‘modifications’ claim to protect the Green Belt, except in very special circumstances, Guildford Borough Council have made an exception for “limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village”. This is an entirely subjective test and a charter for unscrupulous developers to pick off any land they can acquire around the village for development. In this regard, a number of Green Belt fields around the village have already been acquired by potential developers in anticipation of the pay day to be awarded to them by this change in policy. They will get rich at the expense of the local residents who will see their lovely village destroyed by this ill-conceived policy change.
The end result will be that the existing sprawl of London will no longer be restrained by the natural barrier of the M25, but will instead continue to reach into our precious countryside all the way down to and including Guildford itself. This makes a nonsense of the very concept of Green Belt protection as the authors of these proposed changes well know but clearly believe they can disregard.

Attached documents:

Comment: MM2 - LPMM18/5133  Respondent: Hazel Balti 20842017  Agent:

1. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination
2. The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Attached documents:

Comment: MM3 - LPMM18/5131  Respondent: Hazel Balti 20842017  Agent:

I support GRA & GVG findings that the Local Plan is unsound because:
1. The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. The town centre policy, S3, is thus inadequate and also does not address the infrastructure deficit

Attached documents:

Comment: MM41 - LPMM18/5134  Respondent: Hazel Balti 20842017  Agent:

1. There is too much reliance on A3 improvements and they are beyond the council’s control

Attached documents:

Comment: MM2 - LPMM18/5137  Respondent: Ann Smith 20842305  Agent:

- I object that Send has to take on more new housing from Woking Borough.
- I object to the proposal of a travellers site on Dend Hill, 60 houses at Clockbarn in Tannery Lane and a 25% increase in the size of Dend Business Centre despite the Wey Conservation area.
• I object to the unreasonable increased level of proposed housing and industrial sites in such a high concentration in one village which will undoubtedly make the area gridlocked with traffic and will forever change the rural nature of Send and Ripley.

Attached documents:

Comment: MM27 - LPMM18/5128  Respondent: Ann Smith 20842305  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

• I object to this transport strategy as the increase in traffic implications due to the proposed site at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s Farm together with Wisley/Ockham and Gosden Hill appear not to have been properly addressed by the changes to the A3 and Clandon slip roads.
• The significant increase in traffic will impact greatly on Send Barns Lane, Send Road, Ripley High Street, causing considerable delays, pollution and gridlock.

Attached documents:

Comment: MM41 - LPMM18/5124  Respondent: Ann Smith 20842305  Agent:

MM41 – Land at Garlicks Arch, Sendmarsh, Policy A43

• I object to this land being taken out of the Green Belt, which contains ancient woodland.
• If built on, it will join up the villages of Send and Ripley and so over develop the area.
• The number of additional cars from house owners and businesses will block the surrounding roads and will considerably add to the already congested Ripley High Street.
• With the closure of Ripley School, schools and medical facilities will be over stretched and under pressure to perform to their highest ability.
• An increase of 37% in the number of houses proposed is excessive.

Attached documents:

Comment: MM41 - LPMM18/5129  Respondent: Ann Smith 20842305  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

• I object to this transport strategy as the increase in traffic implications due to the proposed site at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s Farm together with Wisley/Ockham and Gosden Hill appear not to have been properly addressed by the changes to the A3 and Clandon slip roads.
• The significant increase in traffic will impact greatly on Send Barns Lane, Send Road, Ripley High Street, causing considerable delays, pollution and gridlock.

Attached documents:
Comment: MM42 - LPMM18/5125  Respondent: Ann Smith 20842305  Agent:

MM42 – Land at Burnt Common, London Road, Send, Policy A58

   • I object to the proposed increase from 7,000 to a minimum of 14,800 sq m of industrial and storage on this proposed site.
   • I do not believe that this area can sustain such a large new industrial allocation to the village.
   • This land is Green Belt whereas Slyfield industrial estate has been fully utilised so there is no need to put new industrial sites on this Green Belt and as there are no special circumstances for this to be so, this also contradicts MM9.
   • With no proven demand for an industrial site and in addition to the 25% increase at Send Business Centre, this proposal will make a much bigger concentration in Send than any other village.
   • The road infrastructure simply would not take such extra high traffic and lorries.

Attached documents:

Comment: MM42 - LPMM18/5130  Respondent: Ann Smith 20842305  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy

   • I object to this transport strategy as the increase in traffic implications due to the proposed site at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s Farm together with Wisley/Ockham and Gosden Hill appear not to have been properly addressed by the changes to the A3 and Clandon slip roads.
   • The significant increase in traffic will impact greatly on Send Barns Lane, Send Road, Ripley High Street, causing considerable delays, pollution and gridlock.

Attached documents:

Comment: MM44 - LPMM18/5126  Respondent: Ann Smith 20842305  Agent:

   • MM44 Land at Alderton’s Farm, Send Marsh Road Policy A63
   • I object to the proposed new site for 120 homes, including some self build.
   • This is a Green Belt site with no special circumstances so it contradicts policy MM9.
   • Additional volume of cars will create delays and traffic jams on the Send crossroads.
   • It will have an adverse impact on local infrastructure, the character and amenity of the area.
   • It will remove an important natural corridor between Send and Send Marsh.
   • As the name implies, this is low lying land and is frequently waterlogged.
   • With the proposed sites at Garlick’s Arch, Clockbarn and Winds Ridge, it adds 770 houses to the 1,700 currently in Send, being an increase of 45%, which is far too much for the area’s infrastructure

Attached documents:

Comment: MM48 - LPMM18/5132  Respondent: Ann Smith 20842305  Agent:

MM27 MM41 MM42 and MM48 Transport Strategy
I object to this transport strategy as the increase in traffic implications due to the proposed site at Garlick’s Arch, Burnt Common, Clockbarn and Alderton’s Farm together with Wisley/Ockham and Gosden Hill appear not to have been properly addressed by the changes to the A3 and Clandon slip roads.

The significant increase in traffic will impact greatly on Send Barns Lane, Send Road, Ripley High Street, causing considerable delays, pollution and gridlock.

Comment: MM9 - LPMM18/5127   Respondent: Ann Smith 20842305   Agent:

MM9 Green Belt Policy

- I object to the Green Belt being used for development.
- Although ‘modifications’ claim to protect the Green Belt, except in very special circumstances Guildford Borough Council make an exception for ‘limited infilling outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village. This results in uncertainty and makes a nonsense of the Green Belt protection and any land surrounding our villages is in danger of being taken for development so giving an open invitation to developers and speculators at the expense of residents.

Comment: MM2 - LPMM18/5176   Respondent: Christopher and Alison Taylor 20843265   Agent:

I would like to express my strong objection to the inclusion in MM2 of the plan for the 2000 houses at Wisley Airfield.

I am surprised that the council continues to include this project in their plans.

It would be reasonable for some development on the airfield; two or three hundred homes would be sensible.

The 2000 home development is likely to cause immense congestion on the roads, at the station, in the medical centre and local shops, at the schools etc. It seems to have been ill-conceived, The persistence of the council in including this project, is worrying, and arouses suspicion of lack of consideration at best or greed at worst.

I would like to request that the council reconsider this part of the plan, and massively reduce the size of the Wisley project.

Additionally, I would request that the council ensure that the projected numbers that they use in their plan are the most recent and correct forecasts of the Office for National Statistics.

Comment: MM2 - LPMM18/5215   Respondent: Diana Elliott 20843393   Agent:

I would like to object to the following modifications to the local plan.
MM2. the figures in MM2 are no longer up to date, and do not provide a sound basis for the plan, or justify such extensive loss of Green Belt.

Attached documents:

Comment: MM3 - LPMM18/5216  Respondent: Diana Elliott 20843393  Agent:

2. There is consequently a strong case for taking out a strategic site, and more scope for timely town centre development. This makes table S2b out of date, and MM3 inadequate and in need of re-examination.

Attached documents:

Comment: MM37 - LPMM18/5217  Respondent: Diana Elliott 20843393  Agent:

I also object to policy A26A, which will take more land out of the AONB. I strongly urge that policy A26 should now be dropped, due to the new ONS figures, as this policy will destroy the finest panoramic view of the north side of the Hogs Back between Guildford and Farnham, an 'important' reason why this area was designated an AONB in 1958.

Attached documents:

Comment: MM2 - LPMM18/5225  Respondent: Paige Allen 20843489  Agent:

I would like to object again to the GBC local plan and request the examination in public is reopened. This is only fair and correct so that the office of national statistics can be used.

the WAG representation with advise from Richard Harwood QC states the numerous reasons why this plan is not sustainable which I agree with.

I don't believe I was made aware of the consultation which I expected was a requirement that is was informed.

I await confirmation of your receipt to this objection

Attached documents:

Comment: MM2 - LPMM18/5230  Respondent: Sam McWilliams 20843617  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:
1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

1. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
2. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
3. There is too much reliance on A3 improvements and these are beyond the council’s control
4. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
5. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

1. I would like the Inspector to RE-EXAMINE the Local Plan because:
2. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
3. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. The Clandon Society Objections and Concerns Which I Share

The A247

I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247

I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:
1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.

2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.

3. The development of 120 houses (new site) at Alderton’s Farm, Send Marsh.

4. The development of 1800 houses at Gosden Hill.

5. The opening of North-facing slip roads to/from the A3 at Burnt Common. The timing of the building of these North facing slip roads now appears to be unconnected with the timing of possible relief measures by Highways England for the A3. The implication is that traffic facing continued congestion on the A3 will divert along the A247.

6. The conversion of the Burnt Common roundabout to an all-ways junction with the A3.

7. The development of a road from the Gosden Hill development to the A247/Burnt Common roundabout. This would allow traffic leaving Gosden Hill and Merrow Lane to access the A3 northbound at Burnt Common, avoiding Burpham. It would also allow any traffic from Gosden Hill/Burpham wishing to go due south of Guildford to use the A247 - potentially an easier route than any existing.

8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.

9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.

10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway)
2. The sharp bend at the Lime Grove junction with The Street (A247) where traffic is still in excess of 30mph
3. The dangerous junction with the station road where the exit sight line to the North is limited by the hump and parapet of the bridge over the railway. The visibility of traffic emerging from the station road is also poor for traffic approaching the bridge from the North because of the hump. It was for these reasons, among others, that Surrey County Council rejected Guildford Borough Council’s proposal to build a 1,000 place school on the site behind the station.
4. The sight lines for the exit of the Onslow Arms car park
5. The narrowness of the road near Summers
6. Heavy lorries, buses and coaches being unable to pass each other in the narrow parts of the road without mounting the pavement
7. The sharp bend near Clandon Regis
8. The narrowness of the road at the Bull’s Head
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school
10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
12. The speed of traffic
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.
The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:

Comment: MM23 - LPMM18/5247  Respondent: Sam McWilliams 20843617  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.
MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre.

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside.

Comment: MM31 - LPMM18/5250  Respondent: Sam McWilliams 20843617  Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Comment: MM32 - LPMM18/5251  Respondent: Sam McWilliams 20843617  Agent:

MM32 A height limit for White Lion Walk is required.
Comment: MM33 - LPMM18/5254  Respondent: Sam McWilliams 20843617  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/5256  Respondent: Sam McWilliams 20843617  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/5258  Respondent: Sam McWilliams 20843617  Agent:

MM41 Garlick's Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM44 - LPMM18/5263  Respondent: Sam McWilliams 20843617  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/5241  Respondent: Sam McWilliams 20843617  Agent:

MM9 In Green Belt, proposed limited infilling outside identified settlement boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

Attached documents:
Comment: MM2 - LPMM18/5253  Respondent: Elisabeth Young 20844097  Agent:

Please reconsider the local GRA adviser’s recommendation for 360 new homes for Guildford rather than 672 homes new homes a year as proposed by your Draft Plan.

Guildford can ill afford more loss of country side and surely rush hour traffic congestion has reached its limit!!

Attached documents:

Comment: MM44 - LPMM18/5260  Respondent: Sarah Wheeler 20844289  Agent:

I object strongly to these plans because;

- roads already congested
- lack of school places
- taking away our green land
- not enough public services eg buses, doctors, schools etc.

Attached documents:

Comment: MM51 - LPMM18/5262  Respondent: Deborah Wagstaff 20844449  Agent:

For the attention of Tracey Coleman, Director of Planning and Regeneration

I would like to lodge my firm approval for the modification of the boundary - New Local Plan - Amendment1: Horsleys - West Horsley (South) (MM51) - map p84

Attached documents:

Comment: MM2 - LPMM18/5266  Respondent: Mike Stone 20844513  Agent:

I expressed my concerns back in July 2017 as a concerned parent of a West Horsley resident.

Having looked at the current proposals I have to strongly disagree with your proposals to inset several towns and villages from the Green Belt thus making development that much easier in those locations.

What a legacy for our grandchildren if this unwarranted proposal is adopted!!

Attached documents:
I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. **I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:**
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
   2. There is too much reliance on A3 improvements and these are beyond the council’s control.
   3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit.
   4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

3. **I would like the Inspector to RE-EXAMINE the Local Plan because:**
   1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt.
   2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high.

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

1. **The Clandon Society Objections and Concerns Which I Share**

   **The A247**

   I am very concerned that the latest modifications to the Plan will put even more pressure on the A247 through West Clandon and Send. In the previous consultation, the Clandon Society and others expressed concerns in the strongest terms, pointing out the inadequacies of the road.

   The major modifications now proposed to the Plan will bring additional pressure on this road, and surrounding roads (eg through East Clandon) which will be used to avoid the inevitable traffic build ups on the A247.

   I welcome the recognition in the proposed modifications to the Plan that problems will be created for the A247 by the north facing slip roads to the A3 and the amount of development proposed in the area nearby. However, the provision of a £1 million of developer funded mitigation measures for the A247 through West Clandon will not change the fact that the A247 through West Clandon does not have the capacity to deal with the increase in traffic.

   I do not believe that increasing the carrying capacity of the road is realistic because of the close proximity to the road of listed structures and other buildings and the limited width available - if indeed it is technically feasible.

   I believe that in a few years’ time the traffic will be stop-start heading to the A3 during the morning peak and similarly in the evening peak away from the A3. Such congestion already occurs on the A247 when traffic diverts because of congestion on the A3 and leads to dangerous manoeuvres with lorries and coaches mounting the pavements. This was pointed out in detail in previous submissions by the Clandon Society, the Parish Council and many residents.

   What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.
The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

**I believe that traffic will increase significantly because:**

1. The development of an industrial estate at Burnt Common. At greater than 1.4ha, this is now doubled in size from the previous consultation and presumably will generate at least double the amount of commercial traffic.
2. The development of 550 houses at Garlick’s Arch (an addition of 150) with the main entrance/exit on the A247.
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8. A statement from GBC that the North-facing slip roads at Burnt Common are critical to the delivery of the Local Plan and are necessary for re-distribution of traffic - presumably as part of the policy of directing traffic around Guildford.
9. The obvious implication is that the slip roads will form a northern bypass for Guildford, servicing a wide area to the East and South of the town and using the A247 to access the A3. The pressure caused by this re-distribution is in addition to any increase caused by new developments.
10. The Strategic Highways Assessment showing that much of the additional traffic on the A247 will come from the South (i.e. through West Clandon village) during the a.m. assessment period.

**Problems with the West Clandon section of the A247**

The A247 through the village of West Clandon does not have the capacity to carry the expected increase in traffic. Starting at the A3 and working South on the A247 the issues are:

1. The junction with the current A3 south-bound slip road (modifications are underway).
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4. The sight lines for the exit of the Onslow Arms car park.
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7. The sharp bend near Clandon Regis.
8. The narrowness of the road at the Bull’s Head.
9. The Clandon Junior School and the, in places, narrow footpath for children walking to school.
10. The sharp bend with poor sight lines in either direction at the church.
11. No continuous footpath through the length of the village.
12. The speed of traffic.
13. The classification as an A-road without it having the capability of an A-road.

**Housing Number and the Green Belt**
The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

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Attached documents:

Comment: MM23 - LPMM18/5318  Respondent: Lorraine Morgan 20844961  Agent:

MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

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MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

The Plan is unsound and should be re-examined.

Attached documents:

Comment: MM3 - LPMM18/5316  Respondent: Lorraine Morgan 20844961  Agent:

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Attached documents:

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MM31 There appears to be no allocation for an all-direction bus interchange

Attached documents:

Comment: MM32 - LPMM18/5320  Respondent: Lorraine Morgan 20844961  Agent:
MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5321  Respondent: Lorraine Morgan 20844961  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/5322  Respondent: Lorraine Morgan 20844961  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

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Attached documents:

Comment: MM41 - LPMM18/5323  Respondent: Lorraine Morgan 20844961  Agent:

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Attached documents:

Comment: MM44 - LPMM18/5324  Respondent: Lorraine Morgan 20844961  Agent:

MM44 The new Green Belt site at Send is not justified in view of the revised housing figures.

Attached documents:

Comment: MM9 - LPMM18/5317  Respondent: Lorraine Morgan 20844961  Agent:
In response to the Main Modifications consultation on the Submission Local Plan, October 2018, I wish to object to the inclusion of Site 64, detailed in main modification 45 (ie. MM45)

The proposed site lies between the two settlements of Normandy and Flexford. In the 2016 Submission Local Plan the area comprising Site 64 was not inset from the green belt whilst the villages of Normandy and Flexford were both taken out. In order to facilitate the development of the site, GBC are now proposing that the said piece of land should also be taken out of the green belt, as shown on the map accompanying the proposals for Site 64 - a desperate measure to enable them to build more houses. According to NPPF guidelines, green belt boundaries can only be altered where there are “exceptional circumstances”, but GBC have given no evidence of the existence of any such circumstances. In addition a study made by the GRA (Guildford Residents' Association) suggests that the figures for the number of extra homes required for the Guildford area have been greatly over-inflated by GBC, which means that development on so much green belt in the Borough in general is unnecessary. It is my contention that there is no justification for the development on the green belt proposed in site 64.

Normandy and Flexford have long been regarded as distinct and separate settlements (see map accompanying the 2014 draft Local Plan, and the fact that they were treated as separate villages when inset from the green belt as already mentioned). If the piece of land for Site 64 is taken out of the green belt and developed as proposed, there will be a severe impact upon the openness of the green belt in this area. It is part of an open belt of countryside stretching from Guildford to Ash/Tongham, which is vital in preventing the town of Guildford from extending out in this direction (one of the purposes of the green belt is to stop urban sprawl). By compromising the openness of the green belt in this way, GBC would be creating the opportunity for further degradation in the future. This would result in the possibility for even more development, and the merging of Normandy and Flexford, with the consequent loss of the open character of each. The increasing encroachment into the countryside in this way would lead to the loss of undeveloped land and would potentially result in the degradation of important wildlife habitats and compromise the rural nature of the area. Moreover Site 64 lies within the Wanborough and Normandy Woods and Meadows Biodiversity Opportunity Area (TBL01) designated by the Surrey Nature Partnership, and as such is in all likelihood a valuable resource for nature conservation and biodiversity. By identifying this area as important for wildlife conservation by making it a BOA, developing it for housing is totally inconsistent with NPPF policy.

For the above reasons I strongly object to the inclusion of Site 64 in the local plan and would ask that this is removed from the Submission Local Plan.

In my view the Local Plan is deficient for the following reasons:

1. Opportunities for brownfield development, especially in the town centre, have not been fully explored
2. Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination
3. The grounds for green belt development are inadequate. They do not represent ‘exceptional circumstances’

Attached documents:

Comment: MM3 - LPMM18/5435  Respondent: Peter Slade 20848609  Agent:

2. The town centre policy, S3, is totally inadequate and misses the desirable opportunity to develop a largely pedestrianized town centre

Attached documents:

Comment: MM2 - LPMM18/5519  Respondent: Hazel McGee 20850017  Agent:

I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

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The A247

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10. The sharp bend with poor sight lines in either direction at the church
11. No continuous footpath through the length of the village
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13. The classification as an A-road without it having the capability of an A-road.

THIS ROAD SHOULD BE DE-CLASSIFIED TO THE B-ROAD WHICH IS ALL IT IS ADEQUATE ENOUGH TO BE. TRAFFIC FOR THE A3 FROM THE A25 SHOULD BE SENT THROUGH MERROW TO THE ROUNDABOUTS & DUAL CARRIAGEWAY ALREADY BUILT FOR THE PURPOSE YEARS AGO.

Attached documents:

Comment: MM27 - LPMM18/6260  Respondent: Hazel McGee 20850017  Agent:

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What is needed is an alternative route for traffic. The Plan calls for Merrow Lane to be modified in conjunction with the Gosden Hill development so that it connects to the A3. Together with Park Lane this forms a good, full width road which could divert traffic from the A247. It is recognised that the railway bridge is a constraint, but this is not a unique problem viz. the widening of the Boxgrove Rd. bridge. It is already the intention to build a station next to the bridge.

The £1 million funding is totally inadequate for reducing the inevitable increase in traffic through the villages of West and East Clandon. At most it could be used to make the A247 marginally safer for pedestrians and cyclists by improving speed control measures.

I believe that traffic will increase significantly because:

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13. The classification as an A-road without it having the capability of an A-road.

THIS ROAD SHOULD BE DE-CLASSIFIED TO THE B-ROAD WHICH IS ALL IT IS ADEQUATE ENOUGH TO BE. TRAFFIC FOR THE A3 FROM THE A25 SHOULD BE SENT THROUGH MERROW TO THE ROUNDABOUTS & DUAL CARRIAGEWAY ALREADY BUILT FOR THE PURPOSE YEARS AGO.

Attached documents:

Comment: MM48 - LPMM18/6261  Respondent: Hazel McGee 20850017  Agent: I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:

1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
2. There is too much reliance on A3 improvements and these are beyond the council’s control
3. The town centre policy, S3, is inadequate and also does not address the infrastructure deficit
4. The grounds for Green Belt development are inadequate and do not fulfil the criteria for ‘exceptional circumstances’.

I would like the Inspector to RE-EXAMINE the Local Plan because:

1. There has been a number of major changes made to the Plan by the Council which have changed it significantly, including, but not exclusively, the editing of D1 and removal of D4, and the addition of new housing and increased commercial development on the Green Belt
2. New figures and projections for housing numbers have been released by the ONS which clearly demonstrate that the housing number in the Local Plan is too high

In case Guildford Borough Council is not prepared to accept my request in Section A above I am including the key points made by those three organisations in my full objection to the Modified Local Plan below:

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Attached documents:

Comment: MM2 - LPMM18/5526  Respondent: Ellen Attwood 20850177  Agent:

Ref: Guildford Borough Council’s Modified Local Plan consultation

I would like you to note my following comments:

1. I fully endorse the responses of The Clandon Society, the Guildford Residents’ Association and the Guildford Vision Group and would like their responses to be registered as mine as well.

2. I OBJECT to the Modified Local Plan as a whole as I believe it is fundamentally unsound because:
   1. Guildford Borough Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited
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Housing Number and the Green Belt

The recent release of information from the ONS must cause a recalculation of the housing requirement. In turn, this requires a reconsideration of the policy of taking sites out of the Green Belt.

The Council has long argued that much of the housing required must be built on such sites.

This argument is not supported by the NPPF or ministerial statements and if the housing number is decreased the argument becomes even weaker.

The attendees at the AGM of the Association heard a very cogent case presented by the Guildford Vision Group for much more of the required development to occur in the town on brownfield sites.

Coupled with modal shift these proposals offer the prospect of more manageable traffic levels, improved prospects for the town centre and reduced pressure on the Green Belt.

1. The Guildford Residents’ Association’s Objections and Concerns Which I Share

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

MM2 Although extra sites are required because some might not come to fruition, the housing supply figure in table (S2a) is far too high at double the number of homes needed to support ambitious growth of the economy.

Attached documents:
MM23 In (9) strategic sites should not be exempt from a requirement to reflect locally distinct patterns and character of development. This would be compatible with sites creating their own identity and would avoid “could be anywhere” estates.

MM23 (D1) does not incorporate sufficient elements of deleted policy (D4) to address character adequately.

MM23 Promotion of “green approaches” should clearly include protecting and enhancing greenness along transport corridors within settlements, as well as tree screens around the edge of settlements.

MM23 If (D1) does not capture the qualities, including landscape, to be protected along the Wey Corridor then MM29 should be amended to specifically provide for this.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

MM23 – POLICY D1. Guildford Borough Council, as a major landowner in the centre, must accept the same obligations as imposed on the other strategic site owners by the council as planning authority.

In conclusion I would point out that the Inspector raised a considerable number of questions about the sustainability, viability and reasoning of Guildford Borough Council’s Local Plan and, despite modifications, these questions have not been addressed adequately in the modifications proposed by the Council in this consultation.

Attached documents:

Comment: MM3 - LPMM18/5528  Respondent: Ellen Attwood 20850177  Agent:

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

1. The Guildford Vision Group’s Objections and Concerns Which I Share

MM3 – POLICY S3. Guildford Borough Council must deliver real and coordinated results. The Town Centre must be designated a strategic site or sites

MM3 – POLICY S3. Guildford must have an effective local plan. Development rules must ensure quality of development across the Town Centre

MM3 – POLICY S3. Guildford Borough Council should adopt Guildford Vision Group’s proposals, including the new crossing or equivalent effective alternative, to deliver a safer, pedestrianised town centre with transport resilience and opened riverside

Attached documents:

Comment: MM31 - LPMM18/5540  Respondent: Ellen Attwood 20850177  Agent:
MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 There appears to be no allocation for an all-direction bus interchange.

Attached documents:

Comment: MM32 - LPMM18/5543  Respondent: Ellen Attwood 20850177  Agent:

MM32 A height limit for White Lion Walk is required.

Attached documents:

Comment: MM33 - LPMM18/5546  Respondent: Ellen Attwood 20850177  Agent:

MM33 should require sensitive, low-rise design that is well set back and screened along the Wey Corridor at Slyfield and green roofs for commercial buildings within the site to minimise impact on views from the AONB.

Attached documents:

Comment: MM35 - LPMM18/5548  Respondent: Ellen Attwood 20850177  Agent:

MM35 Gosden Hill Farm should be retained as highly effective Green Belt along the A3 and NOT removed from the Green Belt as proposed in the Plan. Revised housing need figures weaken the justification for this development.

MM35 Transport (2) is too woolly and should clearly require a new access road to a four-way junction onto the A3 at Gosden Hill Farm.

MM35 If some early development occurs at Gosden Hill to fund the scheme, it should be a condition of any access that it does not subsequently become an access for the whole site because the traffic impact on the London and Epsom Roads would be unacceptable.

Attached documents:

Comment: MM41 - LPMM18/5549  Respondent: Ellen Attwood 20850177  Agent:

MM41 Garlick’s Arch should be retained as Green Belt in view of the revised housing need, rather than expanded.
MM44 The new Green Belt site at **Send** is not justified in view of the revised housing figures.

**Attached documents:**

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**Comment:** MM9 - LPMM18/5534  **Respondent:** Ellen Attwood 20850177  **Agent:**

MM9 In Green Belt, proposed limited **infilling outside identified settlement** boundaries should not be allowed as it will harm openness and become a loophole for inappropriate development.

**Attached documents:**

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**Comment:** MM27 - LPMM18/5562  **Respondent:** Elizabeth Mills 20850209  **Agent:**

MM41-Policy A43---MM42-Policy A58---MM44 Policy A63

MM9 Green Belt Policy

MM27-MM41-MM42-MM48 Transport Strategy

Other Developments

I strongly object to the above planning proposals, especially now as the Office of National Statistics confirm that this is far more developments than what is required.

The existing infrastructure will not be able to support the above developments. The roads are already gridlocked, insufficient hospitals, schools, doctor surgeries, transport and the list of these items just keep on growing.

Perhaps it is now time to consider new towns in other parts of the UK as this area of the South East is already at breaking point.

**Attached documents:**

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**Comment:** MM41 - LPMM18/5558  **Respondent:** Elizabeth Mills 20850209  **Agent:**

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**Comment: MM9 - LPMM18/5561  Respondent: Elizabeth Mills 20850209  Agent:**

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**Attached documents:**
After attending the recent meeting by the Guildford Vision Group regarding the Local Plan, I would like to add my response to it's findings.

I agree that the local plan is unsound for the reasons they outlined.

Namely:

1. The council has not properly exploited brownfield sites especially in the town centre.
2. Housing numbers should reflect latest projected requirements. New public meetings should be reopened to examine this.
3. The grounds for green belt development are wrong because 1 to 3 above do not represent "exceptional circumstances".

Attached documents:

3. The town centre policy is inadequate and fails to address infrastructure deficit.

Attached documents:

2. Too much reliance on A3 road improvements which are actually outside council control.

Attached documents:

The current draft of the Local Plan is unsound because:

1. The revised Housing Need figures mean that much proposed greenbelt development is no longer justified and the exceptional circumstances that are required as grounds to allow greenbelt development do not exist.
2. The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.
3. There is no policy dealing with urban areas beyond the town centre such as St Catherine's where we live.
4. It is unacceptable that Guildford should consider having to accommodate housing which Woking claims not to be able to provide.

Attached documents:
Comment: MM3 - LPMM18/5625  Respondent: Joan Clifford 20850753  Agent:

3. Proper planning of the town centre would help to promote more relevant, sensitive development. The hastily-added section is based on pre-internet retail models and numbers.

Attached documents:

Comment: MM41 - LPMM18/5624  Respondent: Joan Clifford 20850753  Agent:

5. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control such as widening the A3, and therefore there is nothing to prevent major greenbelt development taking place, irrespective of the congestion.

Attached documents:

Comment: MM2 - LPMM18/5626  Respondent: Alex Clifford 20850817  Agent:

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Comment: MM3 - LPMM18/5627  Respondent: Alex Clifford 20850817  Agent:

3. Proper planning of the town centre would help to promote more relevant, sensitive development. The hastily-added section is based on pre-internet retail models and numbers.

There need to be height restrictions on any building including the Wey corridor as well as the town centre (Portsmouth Road, North Street etc).

Attached documents:

Comment: MM41 - LPMM18/5628  Respondent: Alex Clifford 20850817  Agent:
5. There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford's control such as widening the A3, and therefore there is nothing to prevent major greenbelt development taking place, irrespective of the congestion.

Attached documents:

Comment: MM35 - LPMM18/5629  Respondent: Dave Smith 20850849  Agent:

Land should be set aside to allow for a 4 way access with A3 near Gosden Hill Farm.

Extra traffic via the present access to A3 via Burpham, Clandon and Ripley will become intolerable to local residents.

Attached documents:

Comment: MM45 - LPMM18/5632  Respondent: Thomas Haynes 20850977  Agent:

I am writing to OBJECT to the above sites inclusion in the GBC local plan.

I live in the property [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the General Data Protection Regulation 2018/Data Protection Act 2018] and some of my objections are listed below.

1/The development is proposed to take 3 years, during this period myself and neighbours would be disturbed by a significant increase in noise, pollution, etc for the entire length of construction.

2/By the very nature of the development, the copse adjacent to my property would be destroyed, leading to the lose of the numerous birds, slow worms, and hedgehogs and various other wildlife that live in and around the copse, and has done for years.

3/The entries to and from the site would lead to an increase in road safety issues.

The increase in the number of large heavy duty vehicles needed to go to the site would cause increased dangers to other road users and pedestrians alike.

4/The increase in housing numbers would in turn lead to an increase in residents.

The existing facilities and utilities I/e medical,drains,overhead electrical cables,flooding,water supply would not be able to cope with the additional residents especially as no expansion of these facilities are proposed.

In conclusion the Council and residents are proud to live in an area of Outstanding natural beauty, please don't change this into USED TO BE........

Attached documents:

Comment: MM45 - LPMM18/5653  Respondent: Christopher Stanworth 20851233  Agent:
In response to the Main Modifications consultation on the Submission Local Plan, October 2018, I wish to strongly object to the inclusion of Site 64, detailed in main modification 45 (i.e. MM45) for the following reasons:

1) No exceptional circumstances (NPPF guidelines) are given to take the site out of the Green Belt

2) The site is outside the settlement boundaries of Normandy and Flexford, as shown in the Local Plan maps of 2014 and was not inset from the Green Belt at that time. Moreover the sites location is described as Flexford whereas the railway clearly forms a natural northern boundary to that settlement.

3) The site will compromise the openness of the Green Belt between Guildford and Ash/Tongham. As these end locations are already threatened with planned development and destruction of the Green Belt it is even more important to keep the Green Belt in this area intact. Taking site A64 out of the Green Belt can only make it easier for further Green Belt degradation in the future.

4) Site 64 lies within the Wanborough and Normandy Woods and Meadows Biodiversity Opportunity Area (BOA, TBL01) designated by the Surrey Nature Partnership. As such this BOA forms an important east-west wildlife/green corridor between Guildford and Ash/Tongham, and removal of the Site 64 area from the Green Belt and subsequent development will decrease the size of important feeding grounds and habitats for birds, mammals and other wildlife. I have recorded a flock of Starling (BoCC4, Birds of Conservation Concern – UK, Channel Islands and Isle of Man, 2015, Red list) feeding on the site in recent years, Yellowhammers some years back in the hedgerow and I have no reason to believe that other BoCC4 red listed birds such Fieldfare, Redwing, Mistle Thrush, Linnet, Grey Wagtail and House Sparrow feed on this site as they have been seen in the surrounding nearby area.

I understand that the Guildford Residents Association (GRA) have appointed an leading national expert to look at the housing requirements for the Borough, and I am very concerned that this advisor has estimated that the number of houses which need to be built per annum is considerably lower (almost half) than the number proposed by GBC in the local plan. If this is correct it is questionable whether so many sites proposed on green belt in the Borough (including Site 64) are justifiable.

Attached documents:

Comment: MM41 - LPMM18/5711  Respondent: Rory Stevens 20851745  Agent:

Re: Guildford Local Plan: Strategy and Sites – Main Modifications 2018

I am very concerned that the character of the village where I live is going to be drastically altered by the Guildford Local Plan as you are going to increase the size of the village by around 45%. I realise that we should be building more houses for people so that one day people like myself will be able to live in this area. However, one of the reasons I like living here is because it is surrounded by greenbelt land and is a lovely place to live. Adding so many houses to a Village like Send seems like it won’t be a village any more – just one massive estate.

Not only that – each of the 770 houses which are built will probably mean 1,540 extra cars as most families have at least two cars - more if teenagers like me live at home. As it is, in the development where I live in Send the town planners did not allow for each house to have two cars each. They allowed for one car each plus 4 visitors for the entire development which was completely unrealistic and poorly thought out even if it meant they could squeeze another house onto the plot.

I object to MM41 - Policy A43 at Garlick’s Arch to build a large housing estate with what now appears to be 550 houses. This is an greater number of new houses for our village to acquire than before causing over-development and changing the character of our village for ever. This will join up the villages of Ripley and Send and erode our beautiful greenbelt land. It will increase pollution levels as there will be so much more traffic on our roads blocking them up.

Attached documents:
Comment: MM42 - LPMM18/5712  Respondent: Rory Stevens 20851745  Agent:

I object to MM42 - Policy A58 at Burnt Common. Why is an industrial development is required when there are empty sites and industrial units at Slyfield and in Guildford especially when the Employment Land Needs Assessment showed a reduction in demand for industrial land?

Attached documents:

Comment: MM44 - LPMM18/5713  Respondent: Rory Stevens 20851745  Agent:

I object to MM44 – Land at Alderton’s Farm, Send Marsh Road - Policy A63 – the new site for 120 homes. I object to this because it is greenbelt land with no special circumstances and it contradicts policy MM9. Most people live here because it is greenbelt land. However, more practically, it will probably mean another 240 cars on the roads around the village adding to the existing congestion in the mornings and evenings. If these 240 are added to the cars that will belong to the massive development planned at Garlick’s Arch, it will mean a total of around 1540 extra cars on the road in Send. This is why people like me feel as strongly as they do. We do not want such a massive increase and is against the wishes of almost everyone who lives here.

Attached documents:

Comment: MM2 - LPMM18/5763  Respondent: Boyer Planning (Mr Mike Newton) 20853697  Agent:

1. INTRODUCTION

1.1 This representation has been prepared on behalf of Trenfold Property Limited and Countryside Properties (UK) Limited (Countryside) in response to the proposed Main Modifications to the ‘Guildford Borough Submission Local Plan. Countryside is a residential developer and holds an option on the Polesden Lane and Send Marsh Road site and is able to deliver residential development at the site early on in the plan period.

1.2 We consider the status of the site and the way in which it has been considered as a potential additional housing allocation to address the Borough’s increased housing requirement, raises clear concerns about the soundness of the Main Modifications.

1.3 Land at Polesden Lane and Send Marsh Road is approximately 2.6ha in size and currently comprises scrub grassland together with spoil and hardstanding associated with the previous uses of the site. It is therefore Previously Developed Land (PDL).

1.4 The site is enclosed on three sides by existing residential development. The site is broadly level and featureless with no significant vegetation within the site. The site benefits from vehicular access from Danesfield suitable to serve the proposed development.

1.5 Further details of the site have been submitted as part of our representations on the Regulation 19 Plan and in our statement for the examination in public.

2. RESPONSE TO MAJOR MODIFICATIONS

MM2 – Policy S2
2.1 In relation to the housing requirement we note and support the increase to 12,600 homes at 672 dwellings p.a. and its inclusion in the Policy. However, we are concerned that the part of this requirement that is a contribution to Woking’s unmet need is subject to review and that the basis for that review is not justified or effective.

2.2 The Policy states “This contribution will be reviewed subsequent to Woking Borough Council reviewing their Local Plan in light of an updated objectively assessed housing need and any comprehensive Green Belt and other related studies.” However, it should made clear that this review must be conducted formally in the context of the review of the Guildford Plan and that the Council cannot reduce the housing requirement without going through the formal statutory process.

2.3 There is at present imprecision in the wording of the policy in relation to this question of review in terms of how the review will be triggered, the timing and process involved. Once the Plan is adopted the Council must remain committed to the housing requirement and it must be a basis for long term strategic planning in accordance with the requirements of the Plan led system. The current wording of the review provision is not effective because of its lack of clarity and precision and should be modified to address this.

2.4 In relation to the proposed housing supply, the modifications to the policy are not sound as they are not in accordance with Government policy, not justified nor effective.

Consistency with National Policy

2.5 Our principal concern that goes to the soundness of the proposed Main Modifications, concerns the question of whether they are consistent with national policy in giving due regard to the effective use of Previously Developed Land (PDL).

2.6 Annex 1 of the NPPF 2018 “Implementation” states at paragraph 214 that “the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019”. It is therefore clear that the previous framework (NPPF 2012) applies to the examination of the Guildford Local Plan and the consideration of these Main Modifications.

2.7 One of the core Planning Principles in the NPPF 2012 (paragraph 17) is to: Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value

2.8 This principle is reflected in Policy S2 of the Plan. In introducing the policy, paragraph 4.1.6 states:

“Development will be directed to the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate)”.

2.9 It should be noted that the new NPPF 2018 is very strong in its emphasis on the use of PDL to meet development needs. It states in paragraph 117: “strategic policies should.........make as much use as possible of previously developed or brownfield land”

2.10 Paragraph 138 of the NPPF 2018 states that where it is necessary to release Green Belt:

“plans should give first consideration to land which has been previously developed and /or is well served by public transport”

2.11 Although the plan is not required to comply with the NPPF 2018, the principle of encouraging the reuse of land that has been previously developed is clearly established by the NPPF 2012 and the Plan itself. This is simply given additional emphasis in the current NPPF and should therefore be taken into account unless there are clear reasons not to do so.

2.12 The Main Modifications have not given due regard to the principle of effective use of PDL established in the NPPF 2012. Nor do the modifications and the site selection process that provides the basis for them, follow the Plan’s principle of making best use of PDL.

2.13 An SA Addendum prepared by AECOM (August 2018) was central to the process of selecting the additional sites needed to address the housing requirement established through the EIP process.
2.14 The SA Addendum establishes the principle that the Modifications should follow the Plan’s spatial strategy. It states: “……there is a hierarchy of places /potential growth locations within the Borough, and that a sequential approach to allocating development sites must be followed. In other words, capacity should be fully utilised at the most suitable sites (e.g. town centre sites), before moving down to the next tier in the hierarchy, and so on until a residual amount of growth is left to be delivered at sites in the bottom tier, namely village Green Belt sites, which tend to be less suitable for development. (para 5.2.9)

2.15 It is acknowledged by the SA in paragraph 5.2.9 that site suitability and constraints are a consideration in applying this hierarchy and therefore a degree of flexibility is required in allocating sites according to the sequential priority.

2.16 The SA then reviews the housing potential at each level of the spatial hierarchy of which there are 10 tiers. The hierarchy and the conclusions reached by the SA (after analysis) about potential for additional housing at each level, are summarised below:

Tier 1 - Guildford town centre the SA Addendum concludes “nil additional housing within Guildford Town Centre should be taken as a ‘given’”

Tier 2 - Wider Guildford urban area Again the SA Addendum concludes (on the basis of its analysis), that “nil additional housing should be taken as a given”

2.17 The same conclusion of “nil additional housing” is then reached for Tier 3: Ash and Tongham urban area, Tier 4: Built up areas of villages, Tier 5: Village gap sites, Tier 6 Brownfield in the Green Belt”, Tier 7: Countryside beyond the Green Belt and Tier 9: New settlement.

2.18 The identification of potential additional housing sites is therefore confined to Tier 8: Green Belt around Guildford or Godalming / Farncombe and Tier 10: Green Belt around Villages. The SA goes on to identify and assess all possible additional sites falling within these tiers and constructs scenarios based on different combinations of sites and capacity between these two tiers.

Housing potential of Tier 6

2.19 Our concern is that the SA Addendum gives very limited and unsound consideration of the potential falling within Tier 6: Brownfield in the Green Belt, in relation to the established Government priority to favour PDL.

2.20 The SA Addendum notes that the supply provided by Tier 6, at 195 homes, is lower than that included within the submission Plan due to the removal of Send Prison in the LAA addendum 2018 (which originally provided 150 homes) as the site is no longer available for development. The housing potential in Tier 6 is therefore diminished rather than increased through the Main Modifications process.

2.21 The Plan currently focuses on major PDL sites in the Green Belt rather than smaller PDL areas that relate well to the built up area of villages, where their PDL status should reinforce other site attributes and strengthen the case for allocation.

2.22 We consider that our clients’ site “Land at Polesden Lane and Send Marsh Road” must be considered within Tier 6 but it is only considered by the SA Addendum within the Tier 10 assessment. This is not consistent with the Government Policy principle of making effective use of PDL.

2.23 Where Land at Polesden Lane and Send Marsh Road is considered as part of the analysis of Tier 10 sites, it is acknowledged that “it comprises an element of PDL” and that “the Council gives weight to the PDL element of land at Polesden Lane and Send Marsh Road”. Given this assessment, it must be considered within Tier 6.

2.24 The PDL status of this site is established by a report sent to the Council in February 2016. This provided significant evidence to support the case for the site being Previously Developed Land. Essentially, the site has been occupied by permanent non-agricultural structures for much of the Twentieth Century. The remains of these structures are still visible on site and the findings of the Geo-Technical assessment lends further support to the existence of foundations on the site.
2.25 If the Polesden Lane and Send Marsh Road site is considered in the Tier 6 analysis it significantly changes the construction of the additional housing scenarios on which the selection of sites in the Main Modifications is based (as presented in Table 5.1 of the SA Addendum).

2.26 In the SA Addendum, the Land at Polesden Lane and Send Marsh Road is one of seven sites that, in different combinations, make up additional housing scenarios or options (Options 1 to 7). If the Polesden Lane site is re-assigned to Tier 6 as it must be, this will significantly alter the scenarios and the basis for judgement between them based on sequential priority and Government Policy (given that the scenarios currently only include sites from tiers 8 and 10).

2.27 This necessary change in the construction of the scenarios leads to the conclusion that the logical and correct choice is for land at Polesden Lane and Send Marsh Road to be allocated as a proposed Main Modification.

2.28 It is therefore our clear conclusion that the reallocation of our client’s site to Tier 6 would result in its allocation for development. That conclusion is strongly supported by the current assessment of the site within the Tier 10 analysis in the SA Addendum.

2.29 The analysis of the Tier 10 sites in the SA addendum (in Section 5.4) narrows down the choice initially to 6 sites. Three of these sites are in Send Marsh including our client’s site at Polesden Lane and Send Marsh Road. In examining these three sites, the SA Addendum states at paragraph 5.4.10:

“The differences in suitability between these sites are quite marginal, but on balance the Council considers Land South of Tannery Lane, Send to be sequentially least preferable. The Council gives weight to the PDL element of Land at Polesden Lane and Send Marsh Road, and the ‘amber Green Belt’ status of Alderton’s Farm (also its ‘not-too-big-not-too small’ size, and the fact that it has been a focus of appraisal and consultation twice)”

2.30 The additional housing scenarios set out in Table 5.1 then include 4 sites within Tier 10 including the Polesden Lane site. Given the marginal differences between the sites, it is clear that the application of sequential priority to the Polesden Lane site as a Tier 6 rather than Tier 10 site would be key to both the construction of the scenarios in Table 5.1 and the choice made between them.

2.31 The SA addendum concludes in paragraph 7.2.1:

“The Council’s preferred option is Option 3, which involves Aaron’s Hill, Godalming (200 homes), Land at Alderton’s Farm, Send Marsh Road, Send Marsh (120 homes), Land east of Glaziers Lane, Flexford (105 homes) and Land at Hornhatch Farm, New Road, Chilworth (80 homes), leading to a total of 555 additional homes being delivered in the first five years of the plan.

2.32 The SA addendum then notes:

“The appraisal does not identify Option 3 as performing notably well in terms of any of the topic headings, but equally it is not identified as performing notably poorly in terms of any topic. It performs jointly least well in terms of two topic headings - ‘land’ and ‘brownfield’, but no major concerns are highlighted.

2.33 The fact that Option 3, which does not include the land at Polesden Lane and Send Marsh Road, performs least well in terms of the “brownfield” measure is also significant in relation to the above analysis. The conclusions regarding Alderton’s Farm (quoted in para 2.28 above from the SA Addendum), specifically the reference made to its “not-too-big-not-too small” size, and the fact that it has been a focus of appraisal and consultation twice, are not a clear basis for choosing between the identified scenarios and the selection of sites, in comparison with the attribute of PDL status.

2.34 It is therefore clear that Modification MM2 (Policy S2) is not consistent with national policy in relation to reuse of PDL. It is also not justified or effective in dealing with the PDL issue as it does not give PDL in the Green Belt the necessary sequential priority that is required by the Plan’s objectives and its site selection methodology.

Other Considerations

2.35 It should be noted that the need to identify the Polesden Lane and Send Marsh Road site within Tier 6 “Brownfield in the Green Belt” within the SA Addendum and therefore within the Modified Policy S4 (and specifically table S2b in the Policy) is supported by a wide range of other relevant site selection considerations. These considerations all underpin
the case for this site to be given sequential priority due to its PDL status.

Safeguarded Land

2.36 The 2014 version of the Plan identified my clients’ land at Polesden Lane and Send Marsh Road as “safeguarded land” in Policy 9 “Villages and Major Previously Developed Sites” and on the proposals map inset for Send Marsh.

2.37 It was clearly important, in identifying safeguarded land, to ensure that these sites were acceptable in principle for development, even if only to be brought forward via a Plan review. Even if the Plan no longer includes safeguarded land as such, the sites previously safeguarded are worthy of re-consideration to provide the additional small deliverable sites now required.

Green Belt Review

2.38 We are concerned that the land at Polesden Lane and Send Marsh Road has been incorrectly judged to be high sensitivity Green Belt land in the Council’s Green Belt and Countryside Study. We see no basis for that conclusion and draw attention to our comparative Green Belt Assessment of the site dated March 2016 that was submitted with our statement for the Examination in Public as an appendix.

2.39 Our Green Belt assessment is important not merely because it draws different conclusions about my client’s site but because it does so on the basis of additional points of assessment and, in particular, a relative assessment of sites in the area based on their degree of contribution to each Green Belt purpose. These facets are absent from the GBCS and we request that our Green Belt assessment be considered within the selection process for the required additional sites.

2.40 Our Green Belt assessment provides a relative assessment of the contribution of sites in the Send, Send Marsh and Ripley areas and there is a sound basis to its conclusion that the Polesden Lane / Send Marsh site makes the least contribution to meeting Green Belt purposes.

Landscape Containment

2.41 All of the above considerations are reinforced by the landscape assessment of the site. Most importantly, the site is adjacent to the village settlement boundary to the north, east and south and is therefore largely within the existing village envelope. The smaller part of the northern boundary, and the western boundary, adjoin fields but these boundaries comprise of strong and mature landscaping.

2.42 Overall, the site is bordered by established housing and defensible boundaries. It therefore has an enclosed character that is visually contained and separate from the wider countryside beyond. This reinforces the sequential priority that should apply to the site based on its PDL status.

A3 Road Improvement Scheme

2.43 The dependence of major strategic sites upon the A3 RIS was a key consideration at the recent EIP hearings.

2.44 Clearly, it is important that the additional sites to be identified to increase supply in the early years of the Plan do not increase dependency on the A3 RIS and the associated uncertainty about housing delivery and, ideally, such sites should have the capability to improve the position.

2.45 The allocation of land at Polesden Lane and Send Marsh Road would not be dependent upon the A3 RIS. Further, the site’s proximity to Woking station (with its high frequency train services) is a key factor in travel choices and in considering how the high impact of growth in Guildford Borough on the A3 may be avoided. This proximity to Woking is also a factor in considering sites that are best placed to meet Woking’s unmet housing need within the HMA.

Proposed Change to Main Modification MM2

2.46 In order to address this issue and ensure the Main Modifications are sound, Table S2b in the Modified Policy S2 should be revised to include an additional 50 dwellings (from the Polesden Lane and Send Marsh Road site) in the category “Previously Developed Land in Green Belt”, so increasing the figure within this category from 195 dwellings to 245 dwellings.
2.47 Whether there is a consequential reduction in the category “Development around Villages” which currently proposes 1,250 dwellings, is a matter for the Council to determine but we consider that this figure and the identified supply that is the basis for it, could be retained as currently proposed. This is because the 50 additional dwellings in the “Previously Developed Land in Green Belt”, category, that we propose, would simply strengthen the flexibility and deliverability of the Plan’s housing supply rather than suggest oversupply of housing or any need to reduce the current identified supply in the Main Modifications.

2.48 A further modification should then be made to include the Polesden Lane and Send Marsh site in the tabulation of allocations (to be added to the site allocations A1 to A64 currently defined in this section of the Plan (see our representation on Main Modifications MM32 to MM 45 below that relate to the site summary table).

**MM32 –M45 Site Allocations Summary Table**

2.49 For the reasons set out in detail in our representation above on MM2 we consider that the site at Polesden Lane and Send Marsh Road, Send Marsh should be included in the modifications to the site allocations summary table, to ensure the Plan is sound in terms of consistency with national policy and meets the “effective” and “justified” tests set out in the NPPF.

Additional Modification Policy to Allocate and define policy requirements in relation to the site at Polesden Lane and Send Marsh Road

2.50 For the reasons set out in detail in our representation above on MM2 we consider that the site at Polesden Lane and Send Marsh Road, Send Marsh should be specified as an allocation under a specific additional policy introduced as a Main Modification to the Plan.

**Attached documents:** 181023 FINAL Representations on GBC Local Plan Main Modifications.pdf (241 KB)
2.2 We also strongly support the inclusion of an allowance of an additional 42 dwellings per annum following adoption of the Plan to accommodate a portion of unmet housing need arising from Woking Borough. Evidence provided by Woking Borough Council at the Examination demonstrates that there will continue to be an element of unmet need that will have to be accommodated within the remainder of the housing market area in order to avoid the significant socio-economic consequences of failing to meet identified needs in full. The 42 dwellings per annum added to the 630 dpa will thus also ensure that the Plan is positively prepared, in terms of seeking to meet both Guildford’s identified needs and unmet needs from neighbouring areas.

2.3 Furthermore, we support the associated increase in the overall number of dwellings being planned for within the Local Plan (identified within Table S2a) which will ensure that the identified housing requirement of 12,600 dwellings can be met over the plan period.

2.4 We note that MM2 also proposes to delete the phased requirement set out in the previous draft of the Plan, and instead identifies an annualised requirement of 630 dpa for each year of the Plan (plus an additional 42 dpa following adoption). We consider this to be a more appropriate approach, as it will ensure that the Borough’s housing needs are met in the early years of the plan period, taking a positive approach to significantly boosting the supply of housing as required by paragraph 47 of the NPPF. Consequently we consider that this proposed modification will address the issues we previously raised, and result in a sound policy that will be positively prepared and consistent with national policy.

Comment: MM23 - LPMM18/5786  Respondent: Ptarmigan Land 20855201  Agent: Iceni Projects Ltd (Stuart Mills)

MM23 – Policy D1

2.6 With regard to the proposed new wording relating to local character, we note that section 6 of the policy states that all new development should be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, but that this requirement appears to be contradicted by section 7, which indicates that it may not be desirable for the strategic allocations to reflect locally distinct patterns of development. This could result in unintended confusion as to how a decision maker should react, given section 6 as currently worded indicates that all development should reflect local character.

2.7 In order to resolve this apparent contradiction, we suggest that it would be helpful to make a minor adjustment to the updated wording of section 6 to indicate that where appropriate, new development should be designed to reflect the distinct local character of the area.

Attached documents:

Comment: MM41 - LPMM18/5787  Respondent: Ptarmigan Land 20855201  Agent: Iceni Projects Ltd (Stuart Mills)

MM41 – Policy A43

2.8 We strongly support the proposed modification to increase the estimated capacity of the Land at Garlick’s Arch from 400 to 550 dwellings. In the context of a significant need to maximise the delivery of homes in the early years following...
adoption of the Plan, this site represents a key opportunity to boost supply at a suitable and sustainable location for growth. The ability of the site to accommodate approximately 550 dwellings has been demonstrated by the detailed evidence provided by Ptarmigan Land in its previous representations and throughout the Examination process, including the masterplan and vision documents, which have been informed by a range of initial technical assessment work.

2.9 The Statement of Common Ground between Guildford Borough Council and Ptarmigan Land dated 3rd July 2018 (document reference GBC-LPSS-SoCG-007) highlights that the original capacity of 400 dwellings was based on a very cautious assumption regarding site densities and a previous masterplan which assumed the inclusion of approximately 7,000 sqm of employment floorspace within the allocation. In light of the latest policy requirements, it is agreed between Guildford Borough Council and Ptarmigan Land that the site is capable of accommodating 550 dwellings whilst still delivering the 6 travelling showpeople plots, as well as sufficient land for access, landscaping/open space and other relevant requirements, including protecting areas of existing woodland (including ancient woodland).

2.10 The site is not subject to any significant constraints that would prevent prompt delivery of all the 550 dwellings by 2024/25, with approximately 450 anticipated to be completed within the first 5 years following adoption of the Plan. The need to increase the supply of housing in the early years of the Plan was a key issue raised at the Examination Hearing Sessions, in order to seek to meet the identified OAN in those years and thus avoid further significant deterioration in market affordability and improve the early delivery of affordable housing. The additional 150 dwellings on the land at Garlick’s Arch will thus provide a welcome and significant boost to the supply of housing in this regard.

2.11 With regard to the proposed additional ‘Transport Strategy’ text within Policy A43, we note that paragraph (0a) refers to the main vehicular access being provided “on the A247 frontage”. However, the boundary of the site identified in the policy does not extend to the A247 frontage, with this land included within allocation A43a, identified for delivery of the new slip roads onto the A3. This land is also within the control of our client and thus the main access from the A247 can be readily delivered, however in order to clarify this point, we recommend altering the wording of this section of the policy to read:

“Main vehicular access to the site allocation provided from the A247.”

2.12 In relation to the proposed additional text at part (0f) of the policy, we support the reference to an enhanced landscape buffer to the A3 and the inclusion of appropriate landscape impact mitigation measures as necessary. However, we consider that the use of the phrase “significant additional measures” may be misleading, as the technical work undertaken to date (as summarised at the Examination Hearing Sessions) by Ptarmigan’s consultant team indicates that the site can be appropriately developed without resulting in unduly harmful landscape impacts. As such, we suggest that it would help to clarify this requirement by amending the text to read “necessary additional measures…” We consider that this slightly amended wording would have the same effect of requiring a future applicant to appropriately mitigate any landscape impacts as necessary, but would not unduly suggest that a development proposal would inevitably have a significant harmful impact.

CONCLUSIONS

3.1 We have set out above, on behalf of our client, our comments on the proposed Main Modifications as set out by Guildford Borough Council in the documents published in September 2018. These build upon our previous representations and matters discussed at the Examination Hearing Sessions.

3.2 We broadly support the draft Local Plan and in particular we strongly support the intention to allocate the land at Garlick’s Arch (at Policy A43) for residential development.

3.3 We trust our comments will be taken into account as the Local Plan is finalised, and look forward to receiving further updates on the progress of the Plan in due course.

Attached documents:
2.5 We welcome the proposed inclusion of part (4a) within Policy H2, as set out within MM6. This modification addresses our previous comments that the supporting text indicating that the 40% affordable requirement will be subject to viability considerations should be included within the policy text. We consider that this now appropriately reflects the guidance at paragraph 173 of the NPPF that it is important to consider viability to enable a development to be deliverable. We thus consider that with this modification the policy will be effective and consistent with national policy.

Attached documents:

Comment: MM2 - LPMM18/5799  Respondent: Taylor Wimpey UK 20855297  Agent: Woolf Bond Planning (Graham Ritchie)

Guildford Borough Proposed Submission Local Plan: Strategy and Sites– Main Modifications (September 2018)

Representations Submitted on Behalf of Taylor Wimpey UK Ltd

Introduction

We refer to the above consultation paper and write on behalf of our client’s, Taylor Wimpey UK Ltd., setting out a number of comments upon the policies and proposals contained in the Main Modifications to the Proposed Submission Local Plan.

As the Council is aware, our client has a controlling interest in the majority of the land between Normandy and Flexford which site was initially proposed as an allocation under proposed Policy A46 in the June 2016 version of the Proposed Submission Local Plan, but was subsequently removed by the Council.

As set out in our Statements for the Examination Hearing Sessions, we continue to object to this decision and consider that the site should be re-allocated and included in as an additional or alternate allocation in a further round of Modifications. Such an amendment would assist in addressing the fundamental soundness concerns to the Main Modifications as set out in our representations below.

Whilst we acknowledge that the Proposed Submission Local Plan: Strategy and Sites for Guildford Borough is being examined under the 2012 version of the NPPF (since it was submitted before the 24th January 2019 date referred to in paragraph 214 of the July 2018 edition), the latest version is nevertheless relevant, particularly with respect of any assessment of the maintenance of a rolling five year supply of housing land.

This is because, pursuant to paragraph 212 of the revised NPPF, the policies in the revised NPPF “are material considerations which should be taken into account in dealing with application from the day of its publication.”

Paragraph 73 of the revised NPPF details how local authorities “should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their local requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved from later in the plan period).”

The glossary of the revised NPPF refines the definition of a deliverable site to read as follows:

‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites
with outline planning permission, permission in principle, allocated in the development plan or identified on a
brownfield register should only be considered deliverable where there is clear evidence that housing completions
will begin on site within five years‘.

(Our emphasis)

The Inspector’s note (ID/6) issued on 22nd June 2018 (although pre-dating the revised NPPF) in paragraph 14 highlights
concerns that “there are important issues regarding the timing of housing delivery” which the Inspector amplified
upon in paragraph 15 to state “in the circumstances the Council should not adopt a stepped trajectory, but should
identify additional sources of housing delivery in the early years of the Plan”.

Although the Inspector highlights his concerns over housing delivery, these were not within the context of the refined
definition of such sites in the revised NPPF. These representation to the Modifications therefore acknowledge the refined
definition of a deliverable site as it would be illogical for the examination of the Local Plan to use the guidance in the
earlier NPPF when any determination of a planning application would need to take account of the revised version.

The need to provide clear evidence that housing completions will begin on site within five years therefore has informed
these representation to the Proposed Main Modifications.

Our representations to the Main Modifications consequently relate to the following
policies:

- Policy S2 (Borough Wide Strategy) (MM2)
- Policy A25 (Gosden Hill) (MM35)
- Policy A26 (Blackwell Farm) (MM36)
- Policy A26a (land for access road between A31 Farnham Road and Blackwell Farm, Hogs Back, Guildford
  (MM37)
- Policy A35 (Wisley Airfield) (MM40)
- Policy A43 (Land at Garlick’s Arch) (MM41 & MM43)
- Policy A46 (Normandy and Flexford)
- Policy A61 (Land at Aaron’s Hill, Godalming) (MM39)
- Policy A62 (land at Hornhatch Farm, adjoining New Road, Chilworth) (MM43)
- Policy A63 (land west of Alderton’s Farm, Send Marsh Road, Send (MM44)
- Policy A64 (land between Glaziers Lane and Strawberry Farm, Flexford) (MM45)

Our original representations were accompanied by the following plans and particulars which are equally relevant to the
representations on behalf of Taylor Wimpey to the Proposed Main Modifications:

- Illustrative Masterplan No. CSA/2516/110/D (CSA Environmental)
- Illustrative Masterplan No. CSA/2516/110/F (CSA Environmental)
- Wyke SANG Location Plan
- Concept Masterplan – Great Westwood No. CSA/2516/120A (CSA Environmental)
- Concept Masterplan – Wanborough Station No. CSA/2516/121B (CSA Environmental)
- Concept Masterplan – Combined No. CSA/2516/122B (CSA Environmental)
- Green Belt Review of Alternative Sites in Guildford Borough (CSA Environmental)

We also continue to rely upon our submissions to the Hearing Sessions.

The National Planning Policy Framework (NPPF) (2012) and the Tests of Soundness

The 2012 version of the NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that
in order to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

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

Effective means the document must be deliverable, flexible and be able to be monitored.
The positive preparation test also requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.

As explained above, whilst the Local Plan is not being examined with respect of the revised NPPF (2018), the guidance on whether a site is deliverable is nevertheless relevant.

For the reasons set out below there are a number of shortcomings with the plan, as currently proposed to be Modified, that result in the need for further amendments. These amendments relate to the need to increase the level of number of deliverable housing sites (therefore by addressing a key concern identified by the Inspector together with acknowledging the refined definition of a deliverable site in the revised NPPF. Taking account these concerns, we also do not consider that the Main Modifications have effectively considered relevant reasonable alternatives to the strategy as currently proposed.

To address these concerns, additional allocations are required in the Plan which are accompanied with the necessary clear evidence of their deliverability within five years thereby resolving the Inspector’s identified shortfall.

Our client’s land at Normandy/Flexford continues to be available, suitable and deliverable to meet important housing needs in the immediate period of the Local Plan, thereby reflecting the refined definition of a deliverable site in the revised NPPF. We remain committed to further engagement with the Council to explore the option of a deliverable allocation on this site, such that it can be incorporated into the final version of the Local Plan.

**POLICY S2: Borough Wide Strategy (MM2)**

**Overall Housing Requirement**

Through the Proposed Main Modifications, the Council states that “provision has been made for at least 12,600 new homes” in the revised policy S2. However, table S2a only indicates a supply of 15,107 dwellings, which is consistent with the content of the additional appendix 0 proposed in the Plan. Consequently, insufficient land has therefore been identified to reflect the commitment in the policy. As detailed elsewhere, notwithstanding the under provision of housing against requirement in policy S2, insufficient deliverable land (reflecting the refined definition of such sites in the revised NPPF) has been included within the Plan. Therefore, to both achieve the Plan requirement in Modified Policy S2 together with maintaining a robust five year supply of housing land, sites for around 1,500 additional dwellings should be allocated.

As explained in the original representations to the Draft Submission Plan alongside these on the Proposed Main Modifications, the land controlled by Taylor Wimpey between Flexford and Normandy should be included as an additional allocation.

Taking account of the failure to provide sufficient sources of supply to address the Plan’s housing requirement for 12,600 dwellings, it is not considered that Modified Policy S2 is not justified upon appropriate evidence and is not effective or consistent with national policy by failing to meet the Borough’s overall market and affordable housing needs.

**Five Year Housing Land Supply**

Before commenting specifically upon the Council’s proposed housing delivery arising from the Main Modifications, we note there is a need for the plan to demonstrate a five year housing land supply on the date of adoption. Any failure to secure this comprises an issue of soundness in respect of compliance with paragraph 47 of the 2012 version of the NPPF and the objective of significantly boosting the supply of housing land and the requirement to demonstrate a five year supply.

The importance of demonstrating a 5 year housing land supply upon adoption, in order to achieve a sound plan, was noted by an EiP Inspector in examining the Canterbury District Local Plan:

‘The Framework indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5-year supply of deliverable sites. As such, I consider that the
Plan would be ineffective and not accord with national policy. It would therefore be unsound unless this can be remedied’.

As noted previously, although the Plan is being examined within the context of the 2012 edition of the NPPF, it is illogical to discount the guidance on the 2018 version, when this is relevant to the determination of planning applications (pursuant to paragraph 212). Therefore, it is essential to review the Council’s assessment of the deliverability of the various sites have regard to the refined definition of such sites in the revised NPPF.

Appendix 0 of the Modified Plan (page 71 of the Main Modifications) details the expected housing trajectory. The projections within this table can then inform the assessment of a five year supply at 1st April 2019 (potentially around the adoption date for the Plan, subject to further consideration by the Inspector).

The following represents the assessment of five year supply at 1st April 2019, following the Liverpool method of addressing the shortfall over the plan period.

<table>
<thead>
<tr>
<th>Step</th>
<th>Detail of step</th>
<th>Output</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Overall Plan requirement 2015-34</td>
<td>12,600</td>
</tr>
<tr>
<td>B</td>
<td>Completions April 2015 – March 2018</td>
<td>980</td>
</tr>
<tr>
<td>C</td>
<td>Expected completions April 2018 – March 2019</td>
<td>284</td>
</tr>
<tr>
<td>D</td>
<td>Residual requirement for plan period (2019-34) (A – (B + C))</td>
<td>11,336</td>
</tr>
<tr>
<td>E</td>
<td>Add 20% to residual requirement (D + 20%)</td>
<td>13,603</td>
</tr>
<tr>
<td>F</td>
<td>Annual requirement for 5 year supply at 1/4/19 (E/15)</td>
<td>907</td>
</tr>
</tbody>
</table>

Appendix 0 provides a trajectory for the various sources of supply which indicates that between April 2019 and March 2024, 4,974 dwellings are expected to be delivered (518 + 905 + 1,063 + 1,271 + 1,217). This therefore equates to a 5.48 years supply (4,974 / 907) or a surplus of 439 dwellings (4,974 – (907 x 5)).

However, this trajectory assumes delivery of sites from 2020/21 from sites upon which development is only permissible once they have been removed from the Green Belt. Taking account of the refined definition of a deliverable site in the revised NPPF, it is not considered that relevant clear evidence has been supplied to demonstrate that these can be completed to provide the scale of completions envisaged i.e. at Aaron’s Hill, Godalming.

If delivery of the sites currently in the Green Belt is delayed until 2020/21, 260 units will be removed from the 5 year supply. Furthermore, the surplus will be reduced if delivery envisaged from the Gosden Hill and Blackwell Farm sites in Guildford (policies A25 and A26) does not reflect expectations, particularly having regard to the scale of infrastructure improvements required and the need to limit impacts upon the A3 until wider enhancements are delivered, as detailed in our original representations and discussed at the examination hearings.

With these delays, the surplus in supply within five years at April 2019 will be eliminated resulting in a plan which is unsound for the purposes of both the 2012 and 2018 NPPFs.
As detailed in our original representations, part of the necessary solution is to identify sites that can provide material boosts to the overall deliverable supply within the immediate five year period, thereby reflecting the refined definition of such sites in the revised NPPF. Presently the plan is overly reliant upon sites that have significant lag times associated with them. Our client’s proposal (see representations below) would enable two or more sales outlets to be established at the Normandy/Flexford (Policy A46) site with completions at approximately 60+dpa per outlet.

If one were to apply a base date of say 2019 (from anticipated adoption of the Plan), a minimum of 200+ dwellings could be delivered at the Normandy/Flexford site within the 5 year period to 2024. Such deliverability is achievable in part due to the site’s greenfield nature and the fact that it is controlled by an established national housebuilder.

Attached documents:

Comment: MM45 - LPMM18/5802  Respondent: Taylor Wimpey UK 20855297  Agent: Woolf Bond Planning (Graham Ritchie)

Omission Site: Policy A46 - Land to the south of Normandy and north of Flexford

Policy A24 (Slyfield)
Policy A25 (Gosden Hill Farm) Policy A26 (Blackwell Farm) Policy A43 (Garlick’s Arch); and
Policy A35 (Former Wisley Airfield)

General

In the previous 2016 version of the Plan, land at Normandy/Flexford formed a proposed allocation for residential led mixed use development under Policy A46 although this was removed in the Draft Submission (2017) version of the Plan. As previously stated, we consider that Policy A46 should be reinstated into the Plan as its exclusion from the Main Modifications represents a serious failure to consider reasonable alternatives particularly with regard to the refined deliverability definition in the revised NPPF.

Consideration of the Council’s Evidence Base regarding the Main Modifications

The updated Sustainability Appraisal (Pg.16) details the reasons for rejecting the land between Flexford and Normandy from allocation in the Main modifications. This indicates with respect of land at Flexford:

“There are four omission sites, of which one can be ruled-out immediately as sequentially least preferable. This is Land to east of The Paddocks (50 homes), which encompasses an SNCI. This was removed from the 2016 Proposed Submission Plan on the basis of a re-survey of the SNCI. Of the remaining three, one can be identified as sequentially least preferable. This is Land to the south of Normandy and north of Flexford (280 homes), which comprises the southern part of a previously much larger site (namely that part which stands-out as benefiting from proximity to Wanborough railway station), that was a proposed strategic allocation in the 2016 Proposed Submission Plan.

The site benefits from its proximity to the rail station; however, a primary issue with the site is that it is too large, and has no potential to be made smaller whilst making use of strong, defensible Green Belt boundaries. It would introduce a very different built form to Flexford, and would have a greater visual impact than the other sites discussed below. It is also the case that, as a larger site, there could be an element of delivery risk, noting that the sequential approach to spatial strategy would necessitate that any allocation at Flexford would need to be in addition to allocation of one of the three Tier 8 sites discussed above, which are all similarly large sites.”

Paragraph 1.1.2 provides the framework within which the Sustainability Appraisal was undertaken. This states:
“A key outcome of hearing sessions was an understanding that there is a need for the Local Plan to allocate one or more additional sites, sufficient to provide for c.550 homes within the first five years following plan adoption, in order for the plan to be found ‘sound’ by the Planning Inspector.”

Whilst the Sustainability Appraisal work was framed upon the basis of accommodating around 550 dwellings, as detailed in these representations, it is not considered that clear evidence of the deliverability of the proposed sites have been included to accord with the refined definition of such sites in the revised NPPF. Furthermore, whilst the objective of ensuring delivery of around 550 dwellings is important, the detailed assessment of our clients site indicates that it was rejected on the basis that it was “too large”. However, given the challenges to increasing delivery within Guildford Borough, together with the clear involvement of a major housebuilder in the promotion of the land at Flexford /Normandy, it is clear that these factors have been discounted in the Council’s especially. Such an approach is considered contrary to the refined definition of a deliverable site in the revised NPPF.

Although the Sustainability Appraisal refers to the visual impact of the site, as highlighted in our earlier representations, paragraph 24.66 in Volume 5 of the Council’s Green Belt & Countryside Study (April 2014) states:

“A PMDA at land parcel H12-A between Flexford and Normandy would be appropriate as a major village expansion due to the established public transport links alongside potential improvements to sustainability credentials, being considered to outweigh the potential harm to the openness and purposes of the Green Belt. A major expansion at H12-A between Flexford and Normandy would generate an additional population of approximately 2,599 and a total population of 4,383, this being very likely to enable a wide range of new facilities with associated sustainability benefits. The location of H12-A between Normandy and Flexford is considered to be particularly sustainable in terms of public transport connections with Wanborough Station located directly to the south within Flexford in addition to the bus services. The PMDA would result in greater settlement coalescence of Flexford and Normandy (Purpose 2). Whilst recognising that any major village expansion will detract from the openness of the surroundings, in this instance, the PMDAs impact will be limited on the wider Green Belt due to extensive woodlands, treebelt and hedgerows, particularly at Waldens Copse and Pusseys Copse within the village expansion site” (Our emphasis)

It has never been our understanding that our client’s site was included as a proposed Green Belt release due solely to its ability to deliver a secondary school. The reason for its previously proposed allocation is effectively summarised in the above statement.

Land for a secondary school was only proposed as part of our representations upon the proposed safeguarded status of the site in the draft Local Plan published for consultation in July 2014. Accordingly, the offer of land for the school was made by Taylor Wimpey after the Council’s Green Belt assessment (see above) confirming the suitability of developing the site in Green Belt terms, including having regard to the sustainability merits of doing so in locational terms (given the proximity of the site to bus and rail services).

In short the land benefits from sustainability credentials that justify its release, in particular, given its enabling benefit of providing land for a new secondary school to serve needs arising from the western part of the Borough and that the land’s impact upon the Green Belt will be limited due to its existing vegetation. There is therefore a fundamental inconsistency between the Plan’s evidence base and the decision taken by the Council in May 2017. Accordingly, the Local Plan is not justified when considered against its own evidence base in this respect.

With the above findings in mind, our clients instructed CSA Environmental to undertake a detailed review of the Council’s Green Belt evidence base documents. This work includes a comparative assessment of certain of the proposed Green Belt allocations. When assessed against the paragraph 80 tests, it is evident that paragraph 24.66 of the Council’s Green Belt & Countryside Study was correct and the site performs well when assessed the five purposes.

Importantly the Council’s proposed allocations perform in certain cases poorly when considered against the NPPF paragraph 80 purposes. Accordingly we request that our client’s site is reallocated either in addition to, or instead of other proposed Green Belt releases. As drafted, the Plan is not justified or consistent with national policy, given that the reasonable alternative of allocating land at Normandy/Flexford, that provides a more sustainable and NPPF Green Belt compliant strategy.
As detailed above, it is not considered that adequate justification for rejecting the clearly deliverable site controlled by Taylor Wimpey at Flexford/Normandy has been provided, especially given the concerns detailed above regarding the deliverability credentials of the Council’s current sources of housing land supply.

On its own merits the actual visual and Green Belt implications of releasing the Policy A46 site for development are not adverse. Therefore, the concerns in the updated Sustainability Assessment on this matter are consequently not justified.

**Deliverability**

For the reasons discussed in our response to Modified Policy S2, there is a demonstrable need for deliverable sites, such as that controlled by our client in order for the Council to be able to demonstrate a continuous 5 year housing land supply throughout the plan period. Its development credentials have been acknowledged in its previously proposed allocation and the site suffers from no technical constraints to delivery. The site is controlled by a national house builder, who has secured appropriate off-site SANG mitigation land at Wyke (SANG location plan attached) and is undertaking detailed survey work to enable a timely outline submission upon adoption of the Plan. Consequently the site offers the opportunity for material delivery within the 5 year period. We consider the site could deliver 100 dwellings by 2021/22, 140 dwellings in 2022/23 and a further 140 dwellings in 2023/24.

Such an approach would assist in meeting the defined and pressing needs discussed above. The re-allocation of the site is therefore necessary so to achieve an effective plan that is delivers housing at the necessary time (i.e. early on in the plan period).

**Alternative Allocation Options**

Our clear position is that the site should be reinstated as an allocation under Policy A46 and the Council’s proposal to de-allocate the site is unsound.

However, and notwithstanding, the site at Normandy/Flexford was identified within several volumes of the Council’s Green Belt & Countryside Study, both as a smaller development parcel in the south (adjacent to Wanborough station) of approximately 280 dwellings and as a larger development of approximately 1,100 dwellings.

The current iteration of the Local Plan has removed the site as an allocation without reconsideration of a potential smaller allocation. Accordingly, we have prepared 3 no. new masterplans that illustrate how smaller developments could come forward on the site and still provide a material contribution towards defined housing needs. These are described below:

- **Concept Masterplan – Wanborough Station** (No. CSA/2516/121B) illustrates a proposed scheme on the southern part of our client’s site. This would provide for approximately 400 no. dwellings, a 2 form entry primary school, local centre and large of areas of publicly accessible green space. A direct pedestrian route to Wanborough station is also provided.

- **Concept Masterplan – Combined** (No. CSA/2516/122A) illustrates how both of these schemes could be developed, whilst retaining a significant gap between Normandy and it is evident from this plan that a self-sustaining community, with a multitude of key services and facilities and good accessibility.

- **Concept Masterplan – Great Westwood** (No. CSA/2516/120A) provides for approximately 425 dwellings on the northern part of our client’s site. A 60 bed care home, local centre, community facility, sports pitches and public open space are also provided. To public transport can be provided on the land. Such a scheme would enable substantial housing delivery and as set out in the CSa Green Belt Review in a manner consistent with NPPF paragraph 80.

**Securing a Permanent Green Belt Boundary Beyond the Plan Period**

In addition, NPPF paragraph 83 requires that when undertaking a Green Belt Review Council’s should consider the intended permanence of the revised Green Belt boundaries such that they should be capable of enduring beyond the plan period. Accordingly we refer to paragraph 4.115 of the original draft Local Plan (July 2014) that stated:

“National planning policy states that when altering boundaries we should have regard to their intended permanence in the long term so that they are capable of enduring beyond the plan period. This includes, where necessary, identifying safeguarded land in order to meet longer-term development needs. We have identified...”
safeguarded land at Fairlands, Send Marsh, Normandy and Flexford, as set out in Site Allocation 118-120 and 123. This land will also ensure that we have the flexibility to meet our current development needs should any of our strategic sites not come forward as envisaged over the plan period.”

Contrary to the above statement, the plan no longer includes proposals to safeguard any land to meet longer term development needs.

Such an approach is inconsistent with NPPF paragraph 83. The safeguarding of additional land would introduce greater flexibility into the Plan so to ensure that if one of the proposed housing allocations does not deliver, safeguarded land could fill the gap without the need for a new Green Belt review. It follows that such an approach would enable a more effective plan.

Whilst the updated Sustainability Appraisal (Box 5.2, page 16) rejects our clients site on the basis on inability to sub-divide the site whilst providing boundaries that reflect the NPPF guidance on permanence for boundaries, as detailed in our earlier representations, these discounts the associated requirement in the NPPF (2012) to provide safeguard land. The approach in the Sustainability Appraisal has discounted this option and this therefore further reinforces our view that it has discounted reasonable alternatives, especially given the clear suitability of the site identified in the Council’s own evidence.

Suitability of other site in Flexford proposed for allocation

Box 5.2 of the updated Sustainability Appraisal explains the reasons for the choice of the Glaziers Lane site in policy A64. It indicates:

“Of the two more preferable sites, on balance one can be identified as overall sequentially preferable, namely Land east of Glaziers Lane (105 homes). The potential for allocating the site was given close consideration as part of SA work completed in 2017, as reported within the SA Report Update (2017), and it was similarly identified that it should be examined further through additional housing scenarios. Relative to the other site (Land between Beech Lane and Westwood Lane; 100 homes) Land east of Glaziers Lane benefits from better proximity to the train station (it is almost adjacent). This is considered to be an overriding consideration, albeit the site would be visible from the railway station and Glaziers Lane, and is less preferable in Green Belt terms (the GBCS identifies the PDA within which Land East of Glaziers Lane falls as comprising ‘red-rated’ Green Belt, whilst Land between Beech Lane and Westwood Lane falls within an ‘amber-rated’ PDA). Land east of Glaziers Lane is considered further in Section 5.4.”

As noted previously in our representations, our clients land at Flexford/Normandy directly adjoins the station and therefore is consequently equally sustainable to that to the east of Glaziers Lane site. In terms of securing a permanent defensible Green Belt boundary however, our client’s site is bound by roads on its eastern and western sides and if a smaller part of it were to be released woodland on its northern side.

By comparison the Glaziers Lane site does not benefit from any logical boundary on its northern or eastern boundaries and is instead simply defined by a field boundary.

It follows that in terms of securing a permanent defensible boundary it performs worse than our client’s site. Therefore, sequentially it is preferable to the site allocated through the Main Modifications, especially as the Council’s own evidence indicates it could be removed from the Green Belt without harm to the relevant purposes.

We further note that the site is within the control of a housebuilder who could commence delivery on the site such that a material contribution can be made to the Council’s housing land supply position. We re-assert the important benefits our client’s site can offer (having regard to the above) Finally we note that the site to the north of Wanborough Station could provide for a smaller sized scheme of a similar capacity to the favoured site at Glaziers Lane. Such a release could provide a logical extension to Flexford and benefit from excellent accessibility to the train station. We therefore consider that if larger Green Belt releases are not to be made then a justified strategy would need to allocate our client’s site instead of the Glaziers Lane site, as the better available option.

Summary: Proposed Change
We object to the proposed deletion of our client’s land between Flexford and Normandy (Policy A46) as a housing led mixed use allocation. For the reasons set out in these representations we request that it is reallocated in the form previously proposed as a further main modification.

Notwithstanding the above position, alternative options are also available and we are seeking an allocation for smaller schemes as set out below:

1. Allocate the Great Westwood site for a residential led allocation comprising approximately 425 dwellings.
2. Allocate the Wanborough Station site for a residential led allocation comprising approximately 400 dwellings.
3. Allocate the site but with reduced site boundaries that cover the southern and northern sites, resulting in an overall allocation for approximately 825 dwellings.
4. Allocate a smaller site directly to the north of Wanborough Station site for a residential led allocation in favour of the proposed site at Glaziers
5. Identify our client’s site as safeguarded land removed from the Green Belt to meet longer term needs beyond the plan

**Next Steps**

We request the opportunity to appear at any future Examination sessions, should any such hearings take place in order to consider the soundness of the Plan having regard to the proposed modifications,

We remain committed to further engagement with the Council to explore the option of a deliverable allocation on this site, such that it can be incorporated into final modifications to the Local Plan as part of the Examination process.

Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising

**Attached documents:**

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**Comment:** MM12 - LPMM18/5813  **Respondent:** Bloor Homes 20855809  **Agent:** Turley (Clara Millar)

**Main Modification 12**

2.6 Main modification 12 relates to Policy P5: Thames Basin Heaths Special Protection Area. Whilst we have no comments on the policy itself and the approach which it promotes, we are somewhat concerned that there is still no provision of strategic SANG in the Borough.

2.7 At present, there is no evidence to demonstrate that there is sufficient SANG to support the development proposed. This will, therefore, compromise the delivery of many sites across the Borough that do not benefit from their own bespoke SANG. The Council must, therefore, identify adequate SANG in order to secure the proposed development over the plan period.

2.8 Our client’s site at Nutbourne Farm, benefits from having the capacity to allow for an extension to the SANG currently proposed to support the Gosden Hill Farm allocation. Therefore, Nutbourne Farm’s delivery – as a comprehensive development with the adjoining allocation - would not be compromised by the lack of strategic SANG

**Attached documents:**

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**Comment:** MM2 - LPMM18/5810  **Respondent:** Bloor Homes 20855809  **Agent:** Turley (Clara Millar)
1. Introduction

1.1 These representations have been prepared by Turley on behalf of Bloor Homes Southern in respect of their comments to the proposed Main Modifications to Guildford Borough Council’s Local Plan.

1.2 Our client has important land interests in the Local Plan area, in particular the northern most parcels of Gosden Hill Farm, as well as Nutbourne Farm which lies to the east.

1.3 Gosden Hill Farm is allocated under Policy A25 for c. 1,800 homes, employment, retail and a school. A Site Location Plan is provided at Appendix One. This response focuses on issues which particularly affect the land controlled by our client.

1.4 Each of our responses relates to a particular modification and this report is structured accordingly.

2. Response to Main Modifications

Main Modification 2

2.1 This main modification relates to Policy S2: Planning for the Borough – Our Spatial Development Strategy. We strongly support the fact that the Council has increased its housing provision in order to meet the Council’s full OAN, as well as a proportion of Woking’s unmet need.

2.2 We consider that this is a positive change and secures closer compliance with National Policy. However, in order to ensure the Council delivers this housing requirement within the plan period, it will be necessary to allow for more flexibility in the Council’s strategy; in other words, we do not consider that the current allocations are sufficient and question the deliverability of some of these sites within the plan period.

2.3 We, therefore, consider that more sites, or extensions to existing proposed allocation sites, should be sought within the sequentially preferable locations – as set out in the Council’s spatial strategy. Our client’s site represents such site: adjoining the Gosden Hill Farm allocation in the Guildford area, this site could deliver additional housing and infrastructure opportunities to meet the increased housing needs.

Attached documents:

Comment: MM24 - LPMM18/5814  Respondent: Bloor Homes 20855809  Agent: Turley (Clara Millar)

Main Modification 24

2.9 This modification relates to Policy D2: Sustainable design, construction and energy. We support the fact the Council has added more flexibility into this policy, particularly in relation to the sustainable development; renewable, low carbon and decentralised energy and carbon reduction sub-sections. Our representations to the Proposed Submission Local Plan in July 2017 expressed concerns that policies therein lacked clarity and flexibility and would subsequently compromise the viability of developments.

2.10 We consider these modifications will ensure that this policy does not prejudice the delivery of development throughout the plan period.

Attached documents:

Comment: MM35 - LPMM18/5822  Respondent: Bloor Homes 20855809  Agent: Turley (Clara Millar)
Main Modification 35

2.11 We strongly support the proposed allocation of land at Gosden Hill Farm, Merrow Lane for a residential mixed use development. It is considered the site will assist Guildford Borough Council (GBC) in meeting its housing requirement, whilst also promoting sustainable patterns of growth owing to its proximity to Guildford, the main urban centre of the Borough. As such, Gosden Hill Farm is an appropriate location for such an allocation and the proposed mix of uses will create a vibrant, mixed community.

2.12 However, we contest the reduction in capacity from 2,000 to 1,800 homes, as per Main Modification 35. This is disconcerting owing to the fact that housing delivery is a major issue in the Borough as acknowledged by the Council in its Housing Topic Paper. It is, therefore, somewhat concerning that there is limited flexibility within the spatial strategy to accommodate further growth and this reduction will serve to further hinder the Council’s ability to meet its housing requirement. As such, we consider that this does not represent pro-active, positive planning.

2.13 This could, however, be overcome by the retention of the overall housing allocation figure and the inclusion of Nutbourne Farm within the allocated site.

2.14 It has been evidenced in our previous representations that Nutbourne Farm – controlled by Bloor Homes - would form a logical extension to the proposed allocation; as such, enabling the site (as a whole) to provide a further 300-400 homes with an associated extension to the SANG currently proposed to support the Gosden Hill Farm allocation. As such, this logical extension would allow for flexibility, aiding the Council to meet its housing requirement within the plan period and ensuring that the figure for this part of the Borough does not need to be reduced.

2.15 To summarise the previous representations, we consider Nutbourne Farm to be suitable for further development. It is considered there are exceptional circumstances in order to justify Nutbourne Farm’s release from the Green Belt.

2.16 These parcels are currently used for car boot sales, as well as agricultural purposes; as such, the site does not truly represent greenfield land and there is a case to be made that such uses render the site previously developed. This, therefore, weighs in favour of the release of Green Belt.

2.17 Furthermore, prior representations have provided a critique of the Council’s Green Belt review and the performance of the relevant assessment parcel against the wider Green Belt purposes. The main disputes were in relation to: Purpose 2 – to prevent neighbouring towns from merging into one another. The Council considers that the site is essential in order to prevent Guildford and West Clandon from merging. Our assessment of the site highlighted the importance of specifically considering land under control of Bloor Homes, rather than the wider assessment parcel; developing Nutbourne Farm in isolation would not compromise the gap between Guildford and West Clandon. This gap would be further reinforced, as part of any future development of Nutbourne Farm, with substantial buffering in order to secure a defensible boundary which endures beyond the plan period.

2.18 All further technical studies undertaken to support the promotion of the site – with respect to ecology, landscape, archaeology, flood risk and heritage – have demonstrated that the site is suitable for development. There are, therefore, no constraints – in principle – to development of the site.

2.19 The Council’s own evidence base seemingly supports the allocation of the site. GBC has recognised the need to release Green Belt in order to assist GBC in meeting its full OAN and to ‘promote sustainable patterns of development’ in the most appropriate locations. We consider that Nutbourne Farm represents such site owing to its sustainable location in close proximity to Guildford and adjoining a proposed allocation.

2.20 As such, the principle of development at this location has already been established as land to the east of Guildford has been pinpointed as suitable for strategic growth. This, therefore, further highlights the appropriateness of Green Belt release in this location. GBC should, therefore, be seeking to maximise these opportunities, especially on sites which align with their own evidence base alongside the Sustainability Appraisal.

2.21 We consider within the context of GBC’s spatial strategy and evidence base, as well as the demonstrated suitability of Nutbourne Farm that further growth should be planned at this site. The wider landholdings of Bloor Homes represent a
logical opportunity to extend the existing allocation at Gosden Hill Farm and further enhance its sustainability credentials and meets the needs of the Borough and the adjoining authorities.

see attachment for Appendix

Attached documents:  Bloor Homes Rep_Redacted.pdf (4.4 MB)

Comment: MM6 - LPMM18/5811  Respondent: Bloor Homes 20855809  Agent: Turley (Clara Millar)

Main Modification 6

2.4 Main modification 6 relates to Policy H2: affordable homes. We welcome the additional flexibility which has been integrated into the policy in relation to affordable housing provision:

“If developers satisfactorily demonstrate that providing the amount of affordable housing required by this policy would not be economically viable, the Council will consider the following to assist with delivering a scheme:

a) varying the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing, size and/or type of homes to be provide: and/or

b) reducing the overall number of affordable homes “.

2.5 We consider this added flexibility allows for site specific circumstances whereby proposals may have been rendered unviable by the level of affordable housing sought. This modification will, therefore, be instrumental in enabling housing delivery.

Attached documents:

Comment: MM2 - LPMM18/5830  Respondent: Anthony Jacques 20856577  Agent:

- Housing numbers should reflect the latest ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination.

- The grounds for green belt development are inadequate because of 1 and 3 and do not represent 'exceptional circumstances'

Attached documents:

Comment: MM3 - LPMM18/5827  Respondent: Anthony Jacques 20856577  Agent:

I have lived in Guildford for nearly 40 years, and have been involved in a variety of resident's associations and other interest bodies concerned with the town's development for much of that time. Over the last six years or so, I have followed carefully the work done by GRA, GVG, and (when it was in existence during Stephen Mansbridge's tenure), I attended the meetings of the Residents Association Liaison Group (RALG).
I am not a NIMBY, and I recognise the need for a pragmatic and negotiated approach to development between all parties. I support the Wisley development, and hope that this will be resubmitted in due course. That area should count as brownfield not greenfield. I am not totally against the Blackwell Farm development but I consider it needs extensive thinning out and modification.

The plan as currently envisaged though is unsound in many ways - let me give some detail:

- Brownfield opportunities, especially in the town centre have not been fully exploited.
- The town centre policy, S3, is thus inadequate and does not address the infrastructure deficit.

Attached documents:

Comment: MM41 - LPMM18/5829  Respondent: Anthony Jacques 20856577  Agent:

- There is too much reliance on A3 improvements which are beyond the council's control.

Attached documents:

Comment: MM2 - LPMM18/5903  Respondent: Claire Stone 20857697  Agent:

I disagree with your proposals to inset several towns and villages from the Green Belt, making development that much easier. I find it entirely unjustified and shocking - what kind of legacy does it set up for the next generations? Looking at other sites e.g. urban, brownfield and windfalls, green field development in the protected Green Belt is entirely unnecessary, especially since urban brownfield is given priority under the new S3 Policy. The latest ONS figures show a much smaller housing requirement (which can be met by higher priority sites). No “exceptional circumstances”, as required by the NPPF, have been offered for any Green Belt development or for “insetting” most of the borough’s villages such as the Horsleys.

Attached documents:

Comment: MM23 - LPMM18/5906  Respondent: Claire Stone 20857697  Agent:

The changes to Policy D1 dilute some vital social requirements and deletion of Policy D4 is not justified as it met the soundness test Less specific text gives a freer hand to developers to get away with socially unsustainable building - a comment which can be read for many of your proposed changes.

I understand that many people who took place in feeding back to the first consultation have not been reminded that this new consultation is taking place, surely bringing its legitimacy into doubt.

Attached documents:
**Comment: MM3 - LPMM18/5905  Respondent: Claire Stone 20857697  Agent:**

Policy S3 should be strengthened to focus on the prioritising the Guildford urban area inspiring urban regeneration over building on our precious Green Belt.

**Attached documents:**

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**Comment: MM45 - LPMM18/5907  Respondent: Tom Kelley 20857761  Agent:**

I wish to object the above proposal on the following grounds.

1. My total mistrust of any proposal to be dealt with by GBC. Having lived here for 26 years you have totally failed to develop the brown field site within Guildford itself.

2. The proposal does not take into account the green belt, or the damage that a development like this will be do.

3. It contains a pond, that is particularly wildlife sensitive.

4. The local infrastructure cannot cope with more development, sewage etc.

5. Local roads are already at dangerously high levels particularly at peak times.

6. My mistrust of developers motivation in building such a high concentration of housing in a confined area.

I find it disturbing that GBC that does not seem to have an ability to plan anything with any expert thought, plucking plans such as this without major justification.

**Attached documents:**

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**Comment: MM2 - LPMM18/5925  Respondent: Sustainable Land Products Ltd 20858657  Agent: Mr Roger Daniels**

1. **INTRODUCTION**

1.1 Sustainable Land Products Ltd (SLP) has an interest at Tangley Place Farm, Worplesdon and has promoted the site throughout the local plan process as a suitable location for residential development.

1.2 Following the inspector’s comments on the hearing sessions, the Council were required to make several amendments to the plan which were then to be consulted upon. This consultation period has now begun and is scheduled to run from 11th September 2018 to 23rd October 2018.

1.3 These representations set out the particularly pertinent changes to the plan and provides some commentary on them.

2. **POLICY CONTEXT AND BACKGROUND**

2.1 The Guildford Local Plan was submitted to the Planning Inspectorate in December 2017. The examination hearings took place between June and July 2018, following which the inspector provided their conclusions to the Council.
2.2 The inspector’s conclusions on the plan confirmed that the stepped approach to housing delivery was inappropriate, raised concerns over the deliverability of housing within the early years of the plan and recommended that additional sources of housing delivery be identified to address this.

2.3 SLP welcomed this finding, having expressed the same reservations over the Council’s strategy to deliver its housing requirement and maintain a healthy supply of housing in the early years of the plan in their representations to the Regulation 19 plan.

2.4 In response, the Council has proposed a number of changes, including the allocation of four new green belt sites at settlements outside of Guildford. SLP will provide their comments on these allocations in the following chapter.

2.5 This was in addition to several modifications to the plan that were required to make the plan sound. This included, but was not exclusive to, the following key measures:
- accommodating 20 per cent of Woking's unmet need (MM2);
- reducing the Gosden Hill Farm allocation by 200 to 1,800 homes (MM35);
- increasing Burnt Common industrial floor space to 14,800 square metres to meet employment land needs (MM42); and
- a new policy (S3) to deliver regeneration in Guildford town centre (MM3).

2.6 In respect of the first bullet point specifically, SLP welcomes this measure, having expressed concerns in respect of the approach to unmet need set out in the submission plan. All other modifications to the plan are not relevant to our client’s interests and, therefore, we do not wish to make any further comments.

3. COMMENTS ON THE KEY MAIN MODIFICATIONS
3.1 To be clear, the specific modifications that SLP feels should be commented on relate to the new green belt sites that have been allocated to help address the shortfall in the early years of the plan. These allocations are contained within policies A61, A62, A63 and A64 and are set out below:
- **Policy A61**: Land at Aaron's Hill, Godalming (200 dwellings);
- **Policy A62**: Land at Hornhatch Farm, adjoining New Road, Chilworth (80 dwellings);
- **Policy A63**: Land west of Alderton’s Farm, Send Marsh Road, Send (120 dwellings);
- **Policy A64**: Land between Glaziers Lane and Strawberry Farm, Flexford (105 dwellings).

3.2 The Council have also identified an already existing site (Land at Garlick’s Farm) as being able to deliver an additional 150 dwellings over the plan period. This is, presumably, the result of the removal of employment space that was originally going to be delivered alongside 400 dwellings. SLP have no comments to make on this modification.

3.3 As can be seen, the Council has sought to address the shortfall in the early years of the plan by allocating additional sites at several locations across the district. Aside from the site at White Lion Walk, High Street, Guildford (Policy A60), all of the identified sites are within the Green Belt.

3.4 Combined, the identified sites have the potential to deliver around 700 additional dwellings over the plan period.

3.5 SLP has the following concerns with the approach of the Council. These are:
- The lack of contingency sites identified alongside the additional allocations; and
- The appropriateness of the locations chosen in sustainability and green belt terms.

**Insufficient contingency in the event of a housing delivery shortfall**

3.6 In previous representations, SLP has highlighted the disparity between past completions within the Borough and the annual housing requirement identified in the local plan. Since the examination, the latter figure has been further increased due to the need to take on some of Woking’s unmet need.

3.7 There is clearly a challenge to raise housing completions to the level required by the local plan. The reliance on large strategic and brownfield sites within Guildford mean that there are significant question marks around the deliverability of these sites due to the need to provide infrastructure for the former (e.g. the A3 RIS) and potential viability issues with the latter.
3.8 Whilst we note the incorporation of a 20% buffer within the proposed housing target, SLP are concerned that the constraints within a significant proportion of the District i.e. Green Belt mean that any shortfall in delivery could not be easily met through speculative applications to boost housing supply.

3.9 Indeed, this has likely been one of principal reasons as to why there is such a disparity between the Council’s net completions over the past 10-12 years and their local plan target.

3.10 Paragraph 11 of the NPPF requires plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. The Council clearly feel that the allocation of the above sites to be sufficient to address this shortfall; however, SLP does not feel that simply allocating more sites provides this flexibility, especially given that there will be no realistic scope to address any future housing shortfall until the Local Plan review stage due to the Green Belt constraints discussed above.

3.11 Whilst SLP is confident that the Council would seek to address any shortfall at the Local Plan review stage, the effect will have been to delay the delivery of housing that could potentially have come forward in the shorter term. This would be contrary to the NPPF’s goal to significantly boost the supply of housing (paragraph 59).

3.12 SLP, therefore, feels that it would be prudent for the Council to consider the inclusion of a set of ‘reserve’ sites that could come forward in circumstances where the ‘presumption’ was engaged (i.e. a deficient housing land supply position or poor performance against the Housing Delivery Test).

3.13 On the issues of Housing Land Supply, the adoption of the plan will not rectify the Council’s position overnight. The revised NPPF makes it explicitly clear as to what can and cannot be included as part of a Five-Year Housing Land Supply assessment. This definition is provided below:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

3.14 Unless the Council is able to provide compelling evidence that the identified sites are deliverable in the short term, it is highly debateable that they would be able to deliver any sites in the early part of the plan period. This would also mean that progress towards addressing the existing shortfall would not be met until the middle part of the plan period which is precisely what the Council are trying to avoid with these allocations.

3.15 In short, any shortfall in housing delivery over the plan period (including the early years) could not be addressed through speculative applications in sustainable locations as these are affected by Green Belt constraints. Therefore, the Council should look to allocate reserve sites (inevitably located in the Green Belt) for development that could come forward in the event of such a shortfall being identified.

3.16 Whilst land at Tangley Place Farm was previously promoted alongside the land allocated as land north of Keens Lane (Policy A22), it would not be reliant on the delivery of the latter in order to come forward for development and certainly could assist in meeting a shortfall, should one arise. Thus, were the Council minded to produce a list of ‘reserve sites’, we would strongly encourage them to include Tangley Place Farm on such a list.

Are the proposed locations the most appropriate?

3.17 SLP questions whether the locations chosen by the Council are the most appropriate in both sustainability and green belt terms.

*Sustainability*
3.18 The Council has included sites at Godalming, Chilworth, Send and Flexford. Godalming aside, Chilworth, Send and Flexford have limited access to facilities and services and would likely require residents to travel into Guildford or other nearby villages to meet their day-to-day needs.

3.19 This is not to say that the sites chosen are inherently unsustainable; however, given that these sites are identified as ‘tier 10’ settlements in the Council’s Sustainability Appraisal, the sequential approach would dictate that sites within the Green Belt around Guildford (‘tier 9’) should have been considered in the first instance.

3.20 Large urban extensions are planned for Guildford (Blackwell Farm and Gosden Farm) as well as an allocation of 150 dwellings at Keens Lane (adjacent to Tangley Place Farm). However, only the latter (alongside some of the brownfield sites identified in the plan) would be expected to deliver any housing in the early plan period.

3.21 Guildford, being the most sustainable location for development (as reflected in the settlement hierarchy) also has the ability to deliver homes swiftly, particularly on non-infrastructure heavy, greenfield sites (such as Tangley Place Farm).

3.22 Indeed, demand at the locations identified by the Council is likely to be weaker than it would be within Guildford given access to services, facilities and employment opportunities that are absent from the surrounding villages. The sustainability credentials of a site generally correlate positively with its market desirability and, therefore, its potential for delivery. If the ambition is to identify sites that could be delivered early in the plan period, then a review of sites within the Green Belt around Guildford should have been the first port of call.

3.23 Furthermore, it is questionable whether the proposed locations are the most appropriate in Green Belt terms. Indeed, the sustainability appraisal conveniently summarises the four identified sites (paragraph 6.6.16). This extract is included at figure 1.

[see attachment for image included here]

3.24 The SA echoes the findings of the Green Belt and Countryside Study which confirms that all but one (Aldertons Farm, Send Marsh Road, Send) are RED rated in terms of their Green Belt sensitivity. In short, they are proposing allocations on highly sensitive Green Belt sites that are no more sustainable than other available and deliverable sites.

3.25 Whilst Tangley Place Farm also falls within an area identified as being highly sensitive in Green Belt terms (parcel J4), this is the result of the site being assessed as part of a wider ‘cell’. Indeed, it is possible for areas within identified parcels to be of limited sensitivity when compared with others. We contend that this is the case for parcel J4.

1 This assessment considered the performance of each ‘cell’ against the five purposes as set out within the NPPF 2012. These did not change following the publication of NPPF 2018. It was assumed that all sites met the fifth aim (assisting in urban regeneration) and so the assessment only assessed performance against the other four purposes.

3.26 SLP has consistently argued that Green Belt boundaries should be reviewed around the north-western edge of Guildford more generally to accommodate a mix of housing and open space uses (including SANG) and reflect physical features that are readily recognisable and likely to be permanent. It is these physical features which should have dictated the land parcels identified for the purposes of the Green Belt review, rather than arbitrary areas based on field boundaries.

3.27 The Land at Tangley Place Farm benefits from such physical/defensible features which limit its sensitivity in Green Belt terms. These features constitute:
• an existing watercourse which bisects this parcel and would form a strong boundary along its western edge);
• important ecological designations and buffer zones affect the site within its northern half and this would ensure a robust northern boundary could established; and
• existing road infrastructure to the east and south which would secure these boundaries.

3.28 The concept document previously submitted with representations also shows how the delivery of development within the southern areas of the site (i.e. those most closely related to the built-up area of Guildford) the site can still contribute to the five key purposes of the Green Belt whilst accommodating some additional development. The site would
also be able to deliver SANG as part of any scheme which has the potential to bring wider ecological benefits by relieving pressure on the Thames Basin Heath SPA.

3.29 The sustainability benefits of the location would make it a much preferable site to those sites that have been identified which are also rated as being highly sensitive in Green Belt terms.

Summary

3.30 Given that the ambition is to deliver homes in the early period of the plan, SLP objects to the Council’s decision to allocate sites that are inherently less sustainable and on highly sensitive Green Belt land when other viable options with better prospects of delivery exist (e.g. Tangle Place Farm).

Conclusion

3.31 SLP does not believe that the Council’s approach to simply identifying more sites provides sufficient flexibility to help deliver the required dwellings in the early years of the plan period. This is because the Green Belt constraints that affect almost all land within the borough mean that opportunities to address the shortfall through speculative applications are severely limited. SLP therefore objects fundamentally to the simplistic approach taken by the Council.

3.32 In order to improve this flexibility, SLP feels that the Council should incorporate a set of reserve sites, alongside those that have been identified that could come forward in the event of a shortfall in housing supply.

3.33 SLP also objects to the sites that have been identified by the Council which are less sustainable and, with the exception of Aldertons Farm, at least as (if not more) sensitive in Green Belt terms than other viable alternatives (e.g. Tangle Place Farm).

3.34 The Council has missed an opportunity to review the Green Belt boundary in a sustainable location along the north-western edge of Guildford to accommodate a mix of housing and open space uses (including SANG) that could alleviate pressures on the Thames Basin Heath SPA and deliver housing during the early years of the plan period.

4. LOCAL PLAN REVIEW

4.1 Paragraph 33 of the NPPF 2018 sets out the requirement for Councils to undertake local plan reviews within five years of their adoption. This has the purpose of updating policies where changing local circumstances indicates a need to do so. This includes a specific reference to strategic housing policies which will require updating if local housing need has changed, or is expected to change, significantly.

4.2 The implications of the revisions to the standard method for Guildford’s housing need are not yet clear, although this would be applied as part of any Local Plan review.

4.3 The Council’s housing completions data are also a cause for concern given that they have been significantly below the required housing need of the plan. Furthermore, the Council’s reliance on large strategic sites to deliver much of its housing toward the middle/later stages of the plan means that there is the potential for a shortfall should there be any significant delays to one or more of these sites.

4.4 The progress of these sites and the Council’s performance against the Housing Delivery Test should be monitored closely to inform the Local Plan review. Should it be revealed that the Council is performing poorly against these and other various measures (Housing Land Supply, delivery trajectories at the key strategic sites etc.) then there will be a strong case for the allocation of further sites given that the Green Belt constraints within the Borough would essentially negate the ability for speculative development to take place in order to address any shortfall.

4.5 Land at Tangle Place Farm would be ideal for an allocation as part of such a plan review given that it would be deliverable, sustainable and allow for the creation of a long-term, robust, defensible Green Belt boundary.

5. CONCLUSION

5.1 SLP generally welcomes the findings of the inspector following the examination hearings and acknowledges some of the positive steps made by the Council in response to his concerns. However, SLP objects to the lack of flexibility within the plan moving forward in the event that a housing shortfall is identified (a scenario which is not unlikely given the disparity between completions figures and the proposed annual housing target).
5.2 Whilst the allocation of additional sites is welcomed, the choice of these sites does not appear to be particularly logical given that more sustainable and less sensitive Green Belt sites are available and, therefore, more likely to be deliverable. Land at Tangley Place Farm is one such location.

5.3 Furthermore, the Green Belt constraints placed on land within the Borough means that there is no scope to address any identified shortfall in scenarios where the ‘presumption in favour of sustainable development’ would apply (e.g. deficient housing land supply position or poor performance against the housing delivery test).

5.4 SLP would, therefore, wish to see the incorporation of a ‘reserve site’ list to provide additional flexibility to the plan. This will ensure that sites can come forward to maintain a healthy supply of homes throughout the plan period should delivery on other allocated sites be slow or fail to come forward at all. Again, land at Tangley Place Farm could fulfil such a role.

5.5 Alternatively, it will be imperative for the Council to be positive at the Local Plan review stage for example, should circumstances dictate a requirement for a higher housing target and/or in the case of under delivery over the early period of the plan. In looking to address these potential issues, the Council will need to identify additional allocations, ideally alongside reserve sites, in order to ensure that housing can come forward consistently throughout the remainder of the plan period.

Attached documents: Sustainable Land Products Rep.pdf (384 KB)
of housing in the early years of the plan in their representations to the Regulation 19 plan.

2.4 In response, the Council has proposed a number of changes, including the allocation of four new green belt sites at settlements outside of Guildford. SLP will provide their comments on these allocations in the following chapter.

2.5 This was in addition to several modifications to the plan that were required to make the plan sound. This included, but was not exclusive to, the following key measures:

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• a new policy (S3) to deliver regeneration in Guildford town centre (MM3).

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3.4 Combined, the identified sites have the potential to deliver around 700 additional dwellings over the plan period.

3.5 SLP has the following concerns with the approach of the Council. These are:

• The lack of contingency sites identified alongside the additional allocations; and
• The appropriateness of the locations chosen in sustainability and green belt terms.

**Insufficient contingency in the event of a housing delivery shortfall**

3.6 In previous representations, SLP has highlighted the disparity between past completions within the Borough and the annual housing requirement identified in
the local plan. Since the examination, the latter figure has been further increased
due to the need to take on some of Woking’s unmet need.

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by the local plan. The reliance on large strategic and brownfield sites within
Guildford mean that there are significant question marks around the deliverability
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RIS) and potential viability issues with the latter.

3.8 Whilst we note the incorporation of a 20% buffer within the proposed housing
target, SLP are concerned that the constraints within a significant proportion of the
District i.e. Green Belt mean that any shortfall in delivery could not be easily met
through speculative applications to boost housing supply.

3.9 Indeed, this has likely been one of principal reasons as to why there is such a
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stage due to the Green Belt constraints discussed above.

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the Local Plan review stage, the effect will have been to delay the delivery of
housing that could potentially have come forward in the shorter term. This would
be contrary to the NPPF’s goal to significantly boost the supply of housing
(paragraph 59).

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able to deliver any sites in the early part of the plan period. This would also mean that progress towards addressing the existing shortfall would not be met until the middle part of the plan period which is precisely what the Council are trying to avoid with these allocations.

3.15 In short, any shortfall in housing delivery over the plan period (including the early years) could not be addressed through speculative applications in sustainable locations as these are affected by Green Belt constraints. Therefore, the Council should look to allocate reserve sites (inevitably located in the Green Belt) for development that could come forward in the event of such a shortfall being identified.

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Are the proposed locations the most appropriate?

3.17 SLP questions whether the locations chosen by the Council are the most appropriate in both sustainability and green belt terms.

Sustainability

3.18 The Council has included sites at Godalming, Chilworth, Send and Flexford. Godalming aside, Chilworth, Send and Flexford have limited access to facilities and services and would likely require residents to travel into Guildford or other nearby villages to meet their day-to-day needs.

3.19 This is not to say that the sites chosen are inherently unsustainable; however, given that these sites are identified as ‘tier 10’ settlements in the Council’s Sustainability Appraisal, the sequential approach would dictate that sites within the Green Belt around Guildford (‘tier 9’) should have been considered in the first instance.

3.20 Large urban extensions are planned for Guildford (Blackwell Farm and Gosden Farm) as well as an allocation of 150 dwellings at Keens Lane (adjacent to Tangleys Place Farm). However, only the latter (alongside some of the brownfield sites identified in the plan) would be expected to deliver any housing in the early plan period.

3.21 Guildford, being the most sustainable location for development (as reflected in the settlement hierarchy) also has the ability to deliver homes swiftly, particularly on non-infrastructure heavy, greenfield sites (such as Tangleys Place Farm).

3.22 Indeed, demand at the locations identified by the Council is likely to be weaker than it would be within Guildford given access to services, facilities and employment opportunities that are absent from the surrounding villages. The sustainability credentials of a site generally correlate positively with its market desirability and, therefore, its potential for delivery. If the ambition is to identify sites that could be delivered early in the plan period, then a review of sites within the Green Belt around Guildford should have been the first port of call.

Green Belt
3.23 Furthermore, it is questionable whether the proposed locations are the most appropriate in Green Belt terms. Indeed, the sustainability appraisal conveniently summarises the four identified sites (paragraph 6.6.16). This extract is included at figure 1.

[see attachment for image included here]

3.24 The SA echoes the findings of the Green Belt and Countryside Study1 which confirms that all but one (Aldertons Farm, Send Marsh Road, Send) are RED rated in terms of their Green Belt sensitivity. In short, they are proposing allocations on highly sensitive Green Belt sites that are no more sustainable than other available and deliverable sites.

3.25 Whilst Tangley Place Farm also falls within an area identified as being highly sensitive in Green Belt terms (parcel J4), this is the result of the site being assessed as part of a wider ‘cell’. Indeed, it is possible for areas within identified parcels to be of limited sensitivity when compared with others. We contend that this is the case for parcel J4.

1 This assessment considered the performance of each ‘cell’ against the five purposes as set out within the NPPF 2012. These did not change following the publication of NPPF 2018. It was assumed that all sites met the fifth aim (assisting in urban regeneration) and so the assessment only assessed performance against the other four purposes.

3.26 SLP has consistently argued that Green Belt boundaries should be reviewed around the north-western edge of Guildford more generally to accommodate a mix of housing and open space uses (including SANG) and reflect physical features that are readily recognisable and likely to be permanent. It is these physical features which should have dictated the land parcels identified for the purposes of the Green Belt review, rather than arbitrary areas based on field boundaries.

3.27 The Land at Tangley Place Farm benefits from such physical/defensible features which limit its sensitivity in Green Belt terms. These features constitute:

• an existing watercourse which bisects this parcel and would form a strong boundary along its western edge);

• important ecological designations and buffer zones affect the site within its northern half and this would ensure a robust northern boundary could established; and

• existing road infrastructure to the east and south which would secure these boundaries.

3.28 The concept document previously submitted with representations also shows how the delivery of development within the southern areas of the site (i.e. those most closely related to the built-up area of Guildford) the site can still contribute to the five key purposes of the Green Belt whilst accommodating some additional development. The site would also be able to deliver SANG as part of any scheme which has the potential to bring wider ecological benefits by relieving pressure on the Thames Basin Heath SPA.

3.29 The sustainability benefits of the location would make it a much preferable site to those sites that have been identified which are also rated as being highly sensitive in Green Belt terms.

Summary
3.30 Given that the ambition is to deliver homes in the early period of the plan, SLP objects to the Council’s decision to allocate sites that are inherently less sustainable and on highly sensitive Green Belt land when other viable options with better prospects of delivery exist (e.g. Tangley Place Farm).

Conclusion
3.31 SLP does not believe that the Council’s approach to simply identifying more sites provides sufficient flexibility to help deliver the required dwellings in the early years of the plan period. This is because the Green Belt constraints that affect almost all land within the borough mean that opportunities to address the shortfall through speculative applications are severely limited. SLP therefore objects fundamentally to the simplistic approach taken by the Council.

3.32 In order to improve this flexibility, SLP feels that the Council should incorporate a set of reserve sites, alongside those that have been identified that could come forward in the event of a shortfall in housing supply.

3.33 SLP also objects to the sites that have been identified by the Council which are less sustainable and, with the exception of Aldertons Farm, at least as (if not more) sensitive in Green Belt terms than other viable alternatives (e.g. Tangley Place Farm).

3.34 The Council has missed an opportunity to review the Green Belt boundary in a sustainable location along the north-western edge of Guildford to accommodate a mix of housing and open space uses (including SANG) that could alleviate pressures on the Thames Basin Heath SPA and deliver housing during the early years of the plan period.

4. LOCAL PLAN REVIEW

4.1 Paragraph 33 of the NPPF 2018 sets out the requirement for Councils to undertake local plan reviews within five years of their adoption. This has the purpose of updating policies where changing local circumstances indicates a need to do so. This includes a specific reference to strategic housing policies which will require updating if local housing need has changed, or is expected to change significantly.

4.2 The implications of the revisions to the standard method for Guildford’s housing need are not yet clear, although this would be applied as part of any Local Plan review.

4.3 The Council’s housing completions data are also a cause for concern given that they have been significantly below the required housing need of the plan. Furthermore, the Council’s reliance on large strategic sites to deliver much of its housing toward the middle/later stages of the plan means that there is the potential for a shortfall should there be any significant delays to one or more of these sites.

4.4 The progress of these sites and the Council’s performance against the Housing Delivery Test should be monitored closely to inform the Local Plan review. Should it be revealed that the Council is performing poorly against these and other various measures (Housing Land Supply, delivery trajectories at the key strategic sites etc.) then there will be a strong case for the allocation of further sites given that the Green Belt constraints within the Borough would essentially negate the ability for speculative development to take place in order to address any shortfall.

4.5 Land at Tangley Place Farm would be ideal for an allocation as part of such a
plan review given that it would be deliverable, sustainable and allow for the creation of a long-term, robust, defensible Green Belt boundary.

5. CONCLUSION
5.1 SLP generally welcomes the findings of the inspector following the examination hearings and acknowledges some of the positive steps made by the Council in response to his concerns. However, SLP objects to the lack of flexibility within the plan moving forward in the event that a housing shortfall is identified (a scenario which is not unlikely given the disparity between completions figures and the proposed annual housing target).

5.2 Whilst the allocation of additional sites is welcomed, the choice of these sites does not appear to be particularly logical given that more sustainable and less sensitive Green Belt sites are available and, therefore, more likely to be deliverable. Land at Tangley Place Farm is one such location.

5.3 Furthermore, the Green Belt constraints placed on land within the Borough means that there is no scope to address any identified shortfall in scenarios where the ‘presumption in favour of sustainable development’ would apply (e.g. deficient housing land supply position or poor performance against the housing delivery test).

5.4 SLP would, therefore, wish to see the incorporation of a ‘reserve site’ list to provide additional flexibility to the plan. This will ensure that sites can come forward to maintain a healthy supply of homes throughout the plan period should delivery on other allocated sites be slow or fail to come forward at all. Again, land at Tangley Place Farm could fulfil such a role.

5.5 Alternatively, it will be imperative for the Council to be positive at the Local Plan review stage for example, should circumstances dictate a requirement for a higher housing target and/or in the case of under delivery over the early period of the plan. In looking to address these potential issues, the Council will need to identify additional allocations, ideally alongside reserve sites, in order to ensure that housing can come forward consistently throughout the remainder of the plan period.

Attached documents:

Comment: MM44 - LPMM18/5927  Respondent: Sustainable Land Products Ltd 20858657  Agent: Mr Roger Daniels

1. INTRODUCTION

1.1 Sustainable Land Products Ltd (SLP) has an interest at Tangley Place Farm, Worplesdon and has promoted the site throughout the local plan process as a suitable location for residential development.
1.2 Following the inspector’s comments on the hearing sessions, the Council were required to make several amendments to the plan which were then to be consulted upon. This consultation period has now begun and is scheduled to run from 11th September 2018 to 23rd October 2018.

1.3 These representations set out the particularly pertinent changes to the plan and provides some commentary on them.

2. POLICY CONTEXT AND BACKGROUND

2.1 The Guildford Local Plan was submitted to the Planning Inspectorate in December 2017. The examination hearings took place between June and July 2018, following which the inspector provided their conclusions to the Council.

2.2 The inspector’s conclusions on the plan confirmed that the stepped approach to housing delivery was inappropriate, raised concerns over the deliverability of housing within the early years of the plan and recommended that additional sources of housing delivery be identified to address this.

2.3 SLP welcomed this finding, having expressed the same reservations over the Council’s strategy to deliver its housing requirement and maintain a healthy supply of housing in the early years of the plan in their representations to the Regulation 19 plan.

2.4 In response, the Council has proposed a number of changes, including the allocation of four new green belt sites at settlements outside of Guildford. SLP will provide their comments on these allocations in the following chapter.

2.5 This was in addition to several modifications to the plan that were required to make the plan sound. This included, but was not exclusive to, the following key measures:
• accommodating 20 per cent of Woking's unmet need (MM2);
• reducing the Gosden Hill Farm allocation by 200 to 1,800 homes (MM35);
• increasing Burnt Common industrial floor space to 14,800 square metres to meet employment land needs (MM42); and
• a new policy (S3) to deliver regeneration in Guildford town centre (MM3).

2.6 In respect of the first bullet point specifically, SLP welcomes this measure, having expressed concerns in respect of the approach to unmet need set out in the submission plan. All other modifications to the plan are not relevant to our client’s interests and, therefore, we do not wish to make any further comments.

3. COMMENTS ON THE KEY MAIN MODIFICATIONS

3.1 To be clear, the specific modifications that SLP feels should be commented on relate to the new green belt sites that have been allocated to help address the shortfall in the early years of the plan. These allocations are contained within policies A61, A62, A63 and A64 and are set out below:
• Policy A61: Land at Aaron's Hill, Godalming (200 dwellings);
• Policy A62: Land at Hornhatch Farm, adjoining New Road, Chilworth (80 dwellings);
• Policy A63: Land west of Alderton’s Farm, Send Marsh Road, Send (120 dwellings);
• Policy A64: Land between Glaziers Lane and Strawberry Farm, Flexford (105 dwellings).
3.2 The Council have also identified an already existing site (Land at Garlick’s Farm) as being able to deliver an additional 150 dwellings over the plan period. This is, presumably, the result of the removal of employment space that was originally going to be delivered alongside 400 dwellings. SLP have no comments to make on this modification.

3.3 As can be seen, the Council has sought to address the shortfall in the early years of the plan by allocating additional sites at several locations across the district. Aside from the site at White Lion Walk, High Street, Guildford (Policy A60), all of the identified sites are within the Green Belt.

3.4 Combined, the identified sites have the potential to deliver around 700 additional dwellings over the plan period.

3.5 SLP has the following concerns with the approach of the Council. These are:

• The lack of contingency sites identified alongside the additional allocations; and
• The appropriateness of the locations chosen in sustainability and green belt terms.

**Insufficient contingency in the event of a housing delivery shortfall**

3.6 In previous representations, SLP has highlighted the disparity between past completions within the Borough and the annual housing requirement identified in the local plan. Since the examination, the latter figure has been further increased due to the need to take on some of Woking’s unmet need.

3.7 There is clearly a challenge to raise housing completions to the level required by the local plan. The reliance on large strategic and brownfield sites within Guildford mean that there are significant question marks around the deliverability of these sites due to the need to provide infrastructure for the former (e.g. the A3 RIS) and potential viability issues with the latter.

3.8 Whilst we note the incorporation of a 20% buffer within the proposed housing target, SLP are concerned that the constraints within a significant proportion of the District i.e. Green Belt mean that any shortfall in delivery could not be easily met through speculative applications to boost housing supply.

3.9 Indeed, this has likely been one of principal reasons as to why there is such a disparity between the Council’s net completions over the past 10-12 years and their local plan target.

3.10 *Paragraph 11* of the NPPF requires plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. The Council clearly feel that the allocation of the above sites to be sufficient to address this shortfall; however, SLP does not feel that simply allocating more sites provides this flexibility, especially given that there will be no realistic scope to address any future housing shortfall until the Local Plan review stage due to the Green Belt constraints discussed above.

3.11 Whilst SLP is confident that the Council would seek to address any shortfall at the Local Plan review stage, the effect will have been to delay the delivery of housing that could potentially have come forward in the shorter term. This would be contrary to the NPPF’s goal to significantly boost the supply of housing *(paragraph 59).*

3.12 SLP, therefore, feels that it would be prudent for the Council to consider the inclusion of a set of ‘reserve’ sites that could come forward in circumstances where...
the ‘presumption’ was engaged (i.e. a deficient housing land supply position or poor performance against the Housing Delivery Test).

3.13 On the issues of Housing Land Supply, the adoption of the plan will not rectify the Council’s position overnight. The revised NPPF makes it explicitly clear as to what can and cannot be included as part of a Five-Year Housing Land Supply assessment. This definition is provided below:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

3.14 Unless the Council is able to provide compelling evidence that the identified sites are deliverable in the short term, it is highly debateable that they would be able to deliver any sites in the early part of the plan period. This would also mean that progress towards addressing the existing shortfall would not be met until the middle part of the plan period which is precisely what the Council are trying to avoid with these allocations.

3.15 In short, any shortfall in housing delivery over the plan period (including the early years) could not be addressed through speculative applications in sustainable locations as these are affected by Green Belt constraints. Therefore, the Council should look to allocate reserve sites (inevitably located in the Green Belt) for development that could come forward in the event of such a shortfall being identified.

3.16 Whilst land at Tangley Place Farm was previously promoted alongside the land allocated as land north of Keens Lane (Policy A22), it would not be reliant on the delivery of the latter in order to come forward for development and certainly could assist in meeting a shortfall, should one arise. Thus, were the Council minded to produce a list of ‘reserve sites’, we would strongly encourage them to include Tangley Place Farm on such a list.

Are the proposed locations the most appropriate?

3.17 SLP questions whether the locations chosen by the Council are the most appropriate in both sustainability and green belt terms.

Sustainability

3.18 The Council has included sites at Godalming, Chilworth, Send and Flexford. Godalming aside, Chilworth, Send and Flexford have limited access to facilities and services and would likely require residents to travel into Guildford or other nearby villages to meet their day-to-day needs.

3.19 This is not to say that the sites chosen are inherently unsustainable; however, given that these sites are identified as ‘tier 10’ settlements in the Council’s Sustainability Appraisal, the sequential approach would dictate that sites within the
Green Belt around Guildford ('tier 9') should have been considered in the first instance.

3.20 Large urban extensions are planned for Guildford (Blackwell Farm and Gosden Farm) as well as an allocation of 150 dwellings at Keens Lane (adjacent to Tangley Place Farm). However, only the latter (alongside some of the brownfield sites identified in the plan) would be expected to deliver any housing in the early plan period.

3.21 Guildford, being the most sustainable location for development (as reflected in the settlement hierarchy) also has the ability to deliver homes swiftly, particularly on non-infrastructure heavy, greenfield sites (such as Tangley Place Farm).

3.22 Indeed, demand at the locations identified by the Council is likely to be weaker than it would be within Guildford given access to services, facilities and employment opportunities that are absent from the surrounding villages. The sustainability credentials of a site generally correlate positively with its market desirability and, therefore, its potential for delivery. If the ambition is to identify sites that could be delivered early in the plan period, then a review of sites within the Green Belt around Guildford should have been the first port of call.

**Green Belt**

3.23 Furthermore, it is questionable whether the proposed locations are the most appropriate in Green Belt terms. Indeed, the sustainability appraisal conveniently summarises the four identified sites (paragraph 6.6.16). This extract is included at figure 1.

[see attachment for image included here]

3.24 The SA echoes the findings of the Green Belt and Countryside Study1 which confirms that all but one (Aldertons Farm, Send Marsh Road, Send) are RED rated in terms of their Green Belt sensitivity. In short, they are proposing allocations on highly sensitive Green Belt sites that are no more sustainable than other available and deliverable sites.

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1 This assessment considered the performance of each ‘cell’ against the five purposes as set out within the NPPF 2012. These did not change following the publication of NPPF 2018. It was assumed that all sites met the fifth aim (assisting in urban regeneration) and so the assessment only assessed performance against the other four purposes.

3.26 SLP has consistently argued that Green Belt boundaries should be reviewed around the north-western edge of Guildford more generally to accommodate a mix of housing and open space uses (including SANG) and reflect physical features that are readily recognisable and likely to be permanent. It is these physical features which should have dictated the land parcels identified for the purposes of the Green Belt review, rather than arbitrary areas based on field boundaries.
3.27 The Land at Tangley Place Farm benefits from such physical/defensible features which limit its sensitivity in Green Belt terms. These features constitute:

• an existing watercourse which bisects this parcel and would form a strong boundary along its western edge;

• important ecological designations and buffer zones affect the site within its northern half and this would ensure a robust northern boundary could established; and

• existing road infrastructure to the east and south which would secure these boundaries.

3.28 The concept document previously submitted with representations also shows how the delivery of development within the southern areas of the site (i.e. those most closely related to the built-up area of Guildford) the site can still contribute to the five key purposes of the Green Belt whilst accommodating some additional development. The site would also be able to deliver SANG as part of any scheme which has the potential to bring wider ecological benefits by relieving pressure on the Thames Basin Heath SPA.

3.29 The sustainability benefits of the location would make it a much preferable site to those sites that have been identified which are also rated as being highly sensitive in Green Belt terms.

Summary

3.30 Given that the ambition is to deliver homes in the early period of the plan, SLP objects to the Council’s decision to allocate sites that are inherently less sustainable and on highly sensitive Green Belt land when other viable options with better prospects of delivery exist (e.g. Tangley Place Farm).

Conclusion

3.31 SLP does not believe that the Council’s approach to simply identifying more sites provides sufficient flexibility to help deliver the required dwellings in the early years of the plan period. This is because the Green Belt constraints that affect almost all land within the borough mean that opportunities to address the shortfall through speculative applications are severely limited. SLP therefore objects fundamentally to the simplistic approach taken by the Council.

3.32 In order to improve this flexibility, SLP Feels that the Council should incorporate a set of reserve sites, alongside those that have been identified that could come forward in the event of a shortfall in housing supply.

3.33 SLP also objects to the sites that have been identified by the Council which are less sustainable and, with the exception of Aldertons Farm, at least as (if not more) sensitive in Green Belt terms than other viable alternatives (e.g. Tangley Place Farm).

3.34 The Council has missed an opportunity to review the Green Belt boundary in a sustainable location along the north-western edge of Guildford to accommodate a mix of housing and open space uses (including SANG) that could alleviate pressures on the Thames Basin Heath SPA and deliver housing during the early years of the plan period.

4. LOCAL PLAN REVIEW

4.1 Paragraph 33 of the NPPF 2018 sets out the requirement for Councils to undertake local plan reviews within five years of their adoption. This has the
purpose of updating policies where changing local circumstances indicates a need to do so. This includes a specific reference to strategic housing policies which will require updating if local housing need has changed, or is expected to change, significantly.

4.2 The implications of the revisions to the standard method for Guildford’s housing need are not yet clear, although this would be applied as part of any Local Plan review.

4.3 The Council’s housing completions data are also a cause for concern given that they have been significantly below the required housing need of the plan. Furthermore, the Council’s reliance on large strategic sites to deliver much of its housing toward the middle/later stages of the plan means that there is the potential for a shortfall should there be any significant delays to one or more of these sites.

4.4 The progress of these sites and the Council’s performance against the Housing Delivery Test should be monitored closely to inform the Local Plan review. Should it be revealed that the Council is performing poorly against these and other various measures (Housing Land Supply, delivery trajectories at the key strategic sites etc.) then there will be a strong case for the allocation of further sites given that the Green Belt constraints within the Borough would essentially negate the ability for speculative development to take place in order to address any shortfall.

4.5 Land at Tangley Place Farm would be ideal for an allocation as part of such a plan review given that it would be deliverable, sustainable and allow for the creation of a long-term, robust, defensible Green Belt boundary.

5. CONCLUSION

5.1 SLP generally welcomes the findings of the inspector following the examination hearings and acknowledges some of the positive steps made by the Council in response to his concerns. However, SLP objects to the lack of flexibility within the plan moving forward in the event that a housing shortfall is identified (a scenario which is not unlikely given the disparity between completions figures and the proposed annual housing target).

5.2 Whilst the allocation of additional sites is welcomed, the choice of these sites does not appear to be particularly logical given that more sustainable and less sensitive Green Belt sites are available and, therefore, more likely to be deliverable. Land at Tangley Place Farm is one such location.

5.3 Furthermore, the Green Belt constraints placed on land within the Borough means that there is no scope to address any identified shortfall in scenarios where the ‘presumption in favour of sustainable development’ would apply (e.g. deficient housing land supply position or poor performance against the housing delivery test).

5.4 SLP would, therefore, wish to see the incorporation of a ‘reserve site’ list to provide additional flexibility to the plan. This will ensure that sites can come forward to maintain a healthy supply of homes throughout the plan period should delivery on other allocated sites be slow or fail to come forward at all. Again, land at Tangley Place Farm could fulfil such a role.

5.5 Alternatively, it will be imperative for the Council to be positive at the Local Plan review stage for example, should circumstances dictate a requirement for a higher housing target and/or in the case of under delivery over the early period of the plan. In looking to address these potential issues, the Council will need to identify additional allocations, ideally alongside reserve sites, in order to ensure
that housing can come forward consistently throughout the remainder of the plan period.

Attached documents:

Comment: MM45 - LPMM18/5928  Respondent: Sustainable Land Products Ltd 20858657  Agent: Mr Roger Daniels

1. INTRODUCTION

1.1 Sustainable Land Products Ltd (SLP) has an interest at Tangley Place Farm, Worplesdon and has promoted the site throughout the local plan process as a suitable location for residential development.

1.2 Following the inspector’s comments on the hearing sessions, the Council were required to make several amendments to the plan which were then to be consulted upon. This consultation period has now begun and is scheduled to run from 11th September 2018 to 23rd October 2018.

1.3 These representations set out the particularly pertinent changes to the plan and provides some commentary on them.

2. POLICY CONTEXT AND BACKGROUND

2.1 The Guildford Local Plan was submitted to the Planning Inspectorate in December 2017. The examination hearings took place between June and July 2018, following which the inspector provided their conclusions to the Council.

2.2 The inspector’s conclusions on the plan confirmed that the stepped approach to housing delivery was inappropriate, raised concerns over the deliverability of housing within the early years of the plan and recommended that additional sources of housing delivery be identified to address this.

2.3 SLP welcomed this finding, having expressed the same reservations over the Council’s strategy to deliver its housing requirement and maintain a healthy supply of housing in the early years of the plan in their representations to the Regulation 19 plan.

2.4 In response, the Council has proposed a number of changes, including the allocation of four new green belt sites at settlements outside of Guildford. SLP will provide their comments on these allocations in the following chapter.

2.5 This was in addition to several modifications to the plan that were required to make the plan sound. This included, but was not exclusive to, the following key measures:
• accommodating 20 per cent of Woking's unmet need (MM2);
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• increasing Burnt Common industrial floor space to 14,800 square metres to meet
employment land needs (MM42); and
• a new policy (S3) to deliver regeneration in Guildford town centre (MM3).

2.6 In respect of the first bullet point specifically, SLP welcomes this measure, having expressed concerns in respect of the approach to unmet need set out in the submission plan. All other modifications to the plan are not relevant to our client’s interests and, therefore, we do not wish to make any further comments.

3. COMMENTS ON THE KEY MAIN MODIFICATIONS

3.1 To be clear, the specific modifications that SLP feels should be commented on relate to the new green belt sites that have been allocated to help address the shortfall in the early years of the plan. These allocations are contained within policies A61, A62, A63 and A64 and are set out below:
• Policy A61: Land at Aaron’s Hill, Godalming (200 dwellings);
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3.2 The Council have also identified an already existing site (Land at Garlick’s Farm) as being able to deliver an additional 150 dwellings over the plan period. This is, presumably, the result of the removal of employment space that was originally going to be delivered alongside 400 dwellings. SLP have no comments to make on this modification.

3.3 As can be seen, the Council has sought to address the shortfall in the early years of the plan by allocating additional sites at several locations across the district. Aside from the site at White Lion Walk, High Street, Guildford (Policy A60), all of the identified sites are within the Green Belt.

3.4 Combined, the identified sites have the potential to deliver around 700 additional dwellings over the plan period.

3.5 SLP has the following concerns with the approach of the Council. These are:
• The lack of contingency sites identified alongside the additional allocations; and
• The appropriateness of the locations chosen in sustainability and green belt terms.

Insufficient contingency in the event of a housing delivery shortfall

3.6 In previous representations, SLP has highlighted the disparity between past completions within the Borough and the annual housing requirement identified in the local plan. Since the examination, the latter figure has been further increased due to the need to take on some of Woking’s unmet need.

3.7 There is clearly a challenge to raise housing completions to the level required by the local plan. The reliance on large strategic and brownfield sites within Guildford mean that there are significant question marks around the deliverability of these sites due to the need to provide infrastructure for the former (e.g. the A3 RIS) and potential viability issues with the latter.

3.8 Whilst we note the incorporation of a 20% buffer within the proposed housing target, SLP are concerned that the constraints within a significant proportion of the District i.e. Green Belt mean that any shortfall in delivery could not be easily met through speculative applications to boost housing supply.
3.9 Indeed, this has likely been one of principal reasons as to why there is such a disparity between the Council’s net completions over the past 10-12 years and their local plan target.

3.10 **Paragraph 11** of the NPPF requires plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. The Council clearly feel that the allocation of the above sites to be sufficient to address this shortfall; however, SLP does not feel that simply allocating more sites provides this flexibility, especially given that there will be no realistic scope to address any future housing shortfall until the Local Plan review stage due to the Green Belt constraints discussed above.

3.11 Whilst SLP is confident that the Council would seek to address any shortfall at the Local Plan review stage, the effect will have been to delay the delivery of housing that could potentially have come forward in the shorter term. This would be contrary to the NPPF’s goal to significantly boost the supply of housing (**paragraph 59**).

3.12 SLP, therefore, feels that it would be prudent for the Council to consider the inclusion of a set of ‘reserve’ sites that could come forward in circumstances where the ‘presumption’ was engaged (i.e. a deficient housing land supply position or poor performance against the Housing Delivery Test).

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3.14 Unless the Council is able to provide compelling evidence that the identified sites are deliverable in the short term, it is highly debateable that they would be able to deliver any sites in the early part of the plan period. This would also mean that progress towards addressing the existing shortfall would not be met until the middle part of the plan period which is precisely what the Council are trying to avoid with these allocations.

3.15 In short, any shortfall in housing delivery over the plan period (including the early years) could not be addressed through speculative applications in sustainable locations as these are affected by Green Belt constraints. Therefore, the Council should look to allocate reserve sites (inevitably located in the Green Belt) for development that could come forward in the event of such a shortfall being identified.

3.16 Whilst land at Tangleys Place Farm was previously promoted alongside the land allocated as land north of Keens Lane (Policy A22), it would not be reliant on
the delivery of the latter in order to come forward for development and certainly could assist in meeting a shortfall, should one arise. Thus, were the Council minded to produce a list of ‘reserve sites’, we would strongly encourage them to include Tangley Place Farm on such a list.

Are the proposed locations the most appropriate?

3.17 SLP questions whether the locations chosen by the Council are the most appropriate in both sustainability and green belt terms.

Sustainability

3.18 The Council has included sites at Godalming, Chilworth, Send and Flexford. Godalming aside, Chilworth, Send and Flexford have limited access to facilities and services and would likely require residents to travel into Guildford or other nearby villages to meet their day-to-day needs.

3.19 This is not to say that the sites chosen are inherently unsustainable; however, given that these sites are identified as ‘tier 10’ settlements in the Council’s Sustainability Appraisal, the sequential approach would dictate that sites within the Green Belt around Guildford (’tier 9’) should have been considered in the first instance.

3.20 Large urban extensions are planned for Guildford (Blackwell Farm and Gosden Farm) as well as an allocation of 150 dwellings at Keens Lane (adjacent to Tangley Place Farm). However, only the latter (alongside some of the brownfield sites identified in the plan) would be expected to deliver any housing in the early plan period.

3.21 Guildford, being the most sustainable location for development (as reflected in the settlement hierarchy) also has the ability to deliver homes swiftly, particularly on non-infrastructure heavy, greenfield sites (such as Tangley Place Farm).

3.22 Indeed, demand at the locations identified by the Council is likely to be weaker than it would be within Guildford given access to services, facilities and employment opportunities that are absent from the surrounding villages. The sustainability credentials of a site generally correlate positively with its market desirability and, therefore, its potential for delivery. If the ambition is to identify sites that could be delivered early in the plan period, then a review of sites within the Green Belt around Guildford should have been the first port of call.

Green Belt

3.23 Furthermore, it is questionable whether the proposed locations are the most appropriate in Green Belt terms. Indeed, the sustainability appraisal conveniently summarises the four identified sites (paragraph 6.6.16). This extract is included at figure 1.

[see attachment for image included here]

3.24 The SA echoes the findings of the Green Belt and Countryside Study1 which confirms that all but one (Aldertons Farm, Send Marsh Road, Send) are RED rated in terms of their Green Belt sensitivity. In short, they are proposing allocations on highly sensitive Green Belt sites that are no more sustainable than other available and deliverable sites.
3.25 Whilst Tangley Place Farm also falls within an area identified as being highly sensitive in Green Belt terms (parcel J4), this is the result of the site being assessed as part of a wider ‘cell’. Indeed, it is possible for areas within identified parcels to be of limited sensitivity when compared with others. We contend that this is the case for parcel J4.

1 This assessment considered the performance of each ‘cell’ against the five purposes as set out within the NPPF 2012. These did not change following the publication of NPPF 2018. It was assumed that all sites met the fifth aim (assisting in urban regeneration) and so the assessment only assessed performance against the other four purposes.

3.26 SLP has consistently argued that Green Belt boundaries should be reviewed around the north-western edge of Guildford more generally to accommodate a mix of housing and open space uses (including SANG) and reflect physical features that are readily recognisable and likely to be permanent. It is these physical features which should have dictated the land parcels identified for the purposes of the Green Belt review, rather than arbitrary areas based on field boundaries.

3.27 The Land at Tangley Place Farm benefits from such physical/defensible features which limit its sensitivity in Green Belt terms. These features constitute:

• an existing watercourse which bisects this parcel and would form a strong boundary along its western edge);
• important ecological designations and buffer zones affect the site within its northern half and this would ensure a robust northern boundary could established; and
• existing road infrastructure to the east and south which would secure these boundaries.

3.28 The concept document previously submitted with representations also shows how the delivery of development within the southern areas of the site (i.e. those most closely related to the built-up area of Guildford) the site can still contribute to the five key purposes of the Green Belt whilst accommodating some additional development. The site would also be able to deliver SANG as part of any scheme which has the potential to bring wider ecological benefits by relieving pressure on the Thames Basin Heath SPA.

3.29 The sustainability benefits of the location would make it a much preferable site to those sites that have been identified which are also rated as being highly sensitive in Green Belt terms.

Summary

3.30 Given that the ambition is to deliver homes in the early period of the plan, SLP objects to the Council’s decision to allocate sites that are inherently less sustainable and on highly sensitive Green Belt land when other viable options with better prospects of delivery exist (e.g. Tangley Place Farm).

Conclusion

3.31 SLP does not believe that the Council’s approach to simply identifying more sites provides sufficient flexibility to help deliver the required dwellings in the early years of the plan period. This is because the Green Belt constraints that affect almost all land within the borough mean that opportunities to address the shortfall through speculative applications are severely limited. SLP therefore objects fundamentally to the simplistic approach taken by the Council.
3.32 In order to improve this flexibility, SLP feels that the Council should incorporate a set of reserve sites, alongside those that have been identified that could come forward in the event of a shortfall in housing supply.

3.33 SLP also objects to the sites that have been identified by the Council which are less sustainable and, with the exception of Aldertons Farm, at least as (if not more) sensitive in Green Belt terms than other viable alternatives (e.g. Tangley Place Farm).

3.34 The Council has missed an opportunity to review the Green Belt boundary in a sustainable location along the north-western edge of Guildford to accommodate a mix of housing and open space uses (including SANG) that could alleviate pressures on the Thames Basin Heath SPA and deliver housing during the early years of the plan period.

4. LOCAL PLAN REVIEW

4.1 Paragraph 33 of the NPPF 2018 sets out the requirement for councils to undertake local plan reviews within five years of their adoption. This has the purpose of updating policies where changing local circumstances indicates a need to do so. This includes a specific reference to strategic housing policies which will require updating if local housing need has changed, or is expected to change, significantly.

4.2 The implications of the revisions to the standard method for Guildford’s housing need are not yet clear, although this would be applied as part of any Local Plan review.

4.3 The Council’s housing completions data are also a cause for concern given that they have been significantly below the required housing need of the plan. Furthermore, the Council’s reliance on large strategic sites to deliver much of its housing toward the middle/later stages of the plan means that there is the potential for a shortfall should there be any significant delays to one or more of these sites.

4.4 The progress of these sites and the Council’s performance against the Housing Delivery Test should be monitored closely to inform the Local Plan review. Should it be revealed that the Council is performing poorly against these and other various measures (Housing Land Supply, delivery trajectories at the key strategic sites etc.) then there will be a strong case for the allocation of further sites given that the Green Belt constraints within the Borough would essentially negate the ability for speculative development to take place in order to address any shortfall.

4.5 Land at Tangley Place Farm would be ideal for an allocation as part of such a plan review given that it would be deliverable, sustainable and allow for the creation of a long-term, robust, defensible Green Belt boundary.

5. CONCLUSION

5.1 SLP generally welcomes the findings of the inspector following the examination hearings and acknowledges some of the positive steps made by the Council in response to his concerns. However, SLP objects to the lack of flexibility within the plan moving forward in the event that a housing shortfall is identified (a scenario which is not unlikely given the disparity between completions figures and the proposed annual housing target).

5.2 Whilst the allocation of additional sites is welcomed, the choice of these sites does not appear to be particularly logical given that more sustainable and less
sensitive Green Belt sites are available and, therefore, more likely to be deliverable. Land at Tangley Place Farm is one such location.

5.3 Furthermore, the Green Belt constraints placed on land within the Borough means that there is no scope to address any identified shortfall in scenarios where the ‘presumption in favour of sustainable development’ would apply (e.g. deficient housing land supply position or poor performance against the housing delivery test).

5.4 SLP would, therefore, wish to see the incorporation of a ‘reserve site’ list to provide additional flexibility to the plan. This will ensure that sites can come forward to maintain a healthy supply of homes throughout the plan period should delivery on other allocated sites be slow or fail to come forward at all. Again, land at Tangley Place Farm could fulfil such a role.

5.5 Alternatively, it will be imperative for the Council to be positive at the Local Plan review stage for example, should circumstances dictate a requirement for a higher housing target and/or in the case of under delivery over the early period of the plan. In looking to address these potential issues, the Council will need to identify additional allocations, ideally alongside reserve sites, in order to ensure that housing can come forward consistently throughout the remainder of the plan period.

**Attached documents:**

**Comment: MM2 - LPMM18/5958  Respondent: Steven Grove 20859009   Agent:**

Yesterday evening I attended a meeting regarding the Guildford Borough Local Plan.

I am very concerned about a number of matters in the proposed Plan which I feel must be addressed, as the Plan as submitted to the Inspector is, I believe, unsound.

It is apparent that the Guildford Council have not explored in depth the availability of brownfield sites both within the town centre and elsewhere in the Borough that would allow a considerable reduction of housing and related developments within the Green Belt, thereby reducing the Green Belt grab.

**Attached documents:**

**Comment: MM3 - LPMM18/5960  Respondent: Steven Grove 20859009   Agent:**

There is no coherent development plan for the Town Centre especially with regard to infrastructure to reduce or alleviate traffic flows through the centre of Guildford, which already can be grid-locked at peak times.

**Attached documents:**
Comment: MM41 - LPMM18/5959  Respondent: Steven Grove 20859009  Agent:

Housing numbers are too high and should be reset in accordance with the latest ONS figures. This would allow less Green Belt grab for development, and with development of brownfield sites, allow Green Belt site(s) to be removed from the Local Plan altogether.

The Local Plan does not show that “exceptional circumstances” have been fully considered and that grounds for Green Belt development are flawed and inadequate.

With the above points requiring to be fully reconsidered, I believe the Local Plan should not be approved by the Inspector as it is “not sound” in the the above matters. It therefore requires to be re-examined in depth by the Inspector before it can be approved.

Attached documents:

Comment: MM2 - LPMM18/5949  Respondent: John Lobley 20859041  Agent:

I note that in the Revised Local Plan (“RLP”) that there has been a small reduction in the proposed number of houses to be built on the green belt sites, although in the main the sites themselves continue to be earmarked for development at a level which is totally unsustainable for the existing community. I attended a presentation at Tongham and asked numerous questions to the Council staff (Mr Spooner was not present) and was not given any satisfactory responses. There was no presentation at Sutherland Park and this omission is remarkable considering the impact of the Gosden Hill Farm (“GHF”) on the residents of Burpham, of which I am one. As such a resident I know first-hand the impact of an additional 5,000 vehicles (from 2,000 new houses) on the already clogged-up narrow roads, in particular Clay Lane which under an additional threat from the Slyfield Regeneration Plan. It is clear that the Council is adopting a plan of “housing first, infrastructure second” as there is no clear plan to ease the traffic other than token gestures such as a new station and park-and-ride (which nobody uses anyway).

I ask that the greenfield sites be removed from the plan, not out of NIMBYism but out of a genuine and deep-seated concern over the effect on the existing community.

Furthermore, I find it extraordinary that you have not had the courtesy to give me any reply to my previous comments and assume you are ignoring them.

Attached documents:

Comment: MM41 - LPMM18/5957  Respondent: Helen Court 20859137  Agent:

MM41 Garlicks Arch, Send Marsh A43

The initial proposal for 400 houses was an awful idea that would put huge strain on the village and it is shocking that this has been increased to 550 homes – this is an increase of 37% and is excessive and extremely unfair and proportionately high compared to other villages in the area.

Once again previous objections to this plan – apparently over 7000 of them, have been ignored. Do we as the people who live here not have a say in this at all?
As with Aldertons – this is a Green Belt area of land that stretches from Send to Ripley and would literally join up the two villages – does this not count as over development?

As a general for both of these sites and also the proposed development MM42 at Burnt Common (A58) will cause excessive congestion on our road network which is already at breaking point. The condition of the roads is dreadful, potholes that are never fixed effectively, only ever patched up. The congestion in both villages is horrendous if ever there are issues on the A3 or M25 and the current plans to alleviate the traffic situation proposed is not going to make a difference.

The village medical centre cannot cope with the current levels of residents – adding 600+ houses would require a huge increase in the capacity at the Villages medical centre. The recent closure of Ripley Primary school has left Send Primary School full – where do you propose to send all of the new children to schools? We also have a huge issue getting our children into good secondary schools – they are all over subscribed. Are there plans to build new schools?

I strongly object to all of these plans for Send – they are disproportionate over the whole of the Guildford area – how is it fair to our village? I understand that every area needs to accept a certain level of building work but I do not understand why Send/Send Marsh has been designated as one area to take the brunt of this building work.

Attached documents:

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**Comment:** MM44 - LPMM18/5956  
**Respondent:** Helen Court  
**Agent:**

I would like to object to the changes proposed on the Guildford Local Plan and specifically on the following areas:

**MM44 Alderton’s Farm, Send Marsh Road A63**

This site has a proposal for 120 homes – it was previously in the plan and there were so many objections to it that it was removed and then suddenly slipped back in at the last minute in July. I don’t understand how all the previous objections can be wiped out as if they never existed?

This land is a Green Belt site, how can this come out of the green belt protection without a separate consultation before planning is applied for?

As a resident backing on to this land – we have a huge number of bats living in the trees in and around the fields – please could you assure me that a survey will be completed before any plans are approved?

This is a rural village area and this building work will detract from the heritage feel of the buildings around the green.

The traffic around our village is horrendous, the crossroads at Mays Corner are already congested – the addition of 240 cars in this one area will swamp the roads even more.

**Attached documents:**

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**Comment:** MM35 - LPMM18/5961  
**Respondent:** Sue and Stuart Brown  
**Agent:**

We object to the local plan, particularly, with regard to Gosden Hill development. Apart from the intrusion into Green Belt which seems to be disregarded but should be more necessary now with the need for trees and green spaces to counter climate change.
This seems a desperate plan to build houses with no regard to a Master Plan for completing infrastructure or even necessity of the number.

The roads round Merrow and Burpham are so congested already causing pollution and disruption to local residents. Traffic is displaced through housing estates to avoid the major hold-ups usually with increased speed and disregard of other road users as their exasperation mounts.

The A3 is one of the busiest non-motorway roads in the country and even minor disruption can cause major diversions through Burpham and onwards. The increased traffic caused by the new housing, station and park and ride will significantly increase traffic in the whole area. Burpham has already been badly affected by the Aldi store.

Traffic trying to get on and off the A3 at the existing junctions cause jams even now and the proposed plans will not improve the situation, even if they are in place before Gosden Hill and Garlick Arch are built on making thousands more cars to use them.

The plans for Slyfield Green and Garlick Hill will also impact on Burpham and Merrow.

The sewage system, particularly around Burpham, has difficulty coping. Rain storms have caused flooding in both Burpham and Merrow at their major roundabouts this year.

It is obvious there is no clear infrastructure plan and the accuracy of the number of houses needed, including student and Woking accommodations, is still unproven.

Attached documents:

Comment: MM38 - LPMM18/5970  Respondent: Wyg (David Butcher) 20859777  Agent:

The following comments are made to the proposed modifications to Policy A29. The modification reference is MM38.

Comments are as follows on subsection 6:

1. The proposed changes to the policy are considered unnecessary and are objected to. The policy as originally worded is considered to provide sufficient clarity and guidance to the proposed development of Land to the South and East of Ash and Tongham under the allocation;
2. The policy as originally worded provided sufficient guidance on coalescence and protecting the character of Ash Green;
3. Whilst all the changes are objected to, the following sentence is specifically objected to: “Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape.” We consider that this sentence should be deleted, as it is ambiguous and an unnecessary repetition of the avoidance of coalescence achieved by the subsequent wording in the policy on providing a green buffer.

Comments on subsection 8 are as follows:

1. The words “…from White Lane, must be protected” should be amended to “…from White Lane, must be considered.” The sentence is too prescriptive as written and does not allow for the operation of the heritage harm assessment set down in the National Planning Policy Framework and Guidance.

Attached documents:

Comment: MM9 - LPMM18/5995  Respondent: M Fronzoni 20863009  Agent:
I am writing this objection letter about the inclusion of villages in the Guildford borough that have now been added without Public consultation and are part of the ‘Limited infilling’ plan.

Some of these Villages are on Green belt land, in conservation areas, historic settings, SPA,s and SSSIs. They include special Conservation areas, with listed buildings and special protection areas and sites of specific scientific interest, such as Whitmoor Common part of the Thames basin heaths.

Guildford already has a terrible problem with traffic, which can take hours out of your daily commute. The A3 is often completely blocked not even allowing for the emergency services to get to the hospital.

I am objecting to limited infilling.

Attached documents:

**Comment:** MM2 - LPMM18/6002  **Respondent:** Guildford Borough Council Executive (Cllr Paul Spooner) 20863233  **Agent:**

**Representation to Guildford Local Plan Main Modifications**

I am writing this letter in conjunction with the Executive at Guildford Borough Council, and with their full support, as Leader of the Council and Lead Member responsible for the Guildford Local Plan.

The Executive wish to adopt a realistic and achievable Local Plan at the earliest opportunity. It has been a long journey, which has been difficult and divisive for some of our community however a new Local Plan is long overdue. Nonetheless, given the current context in relation to the revised OAN, we will not be recommending adoption of the new plan with proposed main modifications. Many difficult decisions have already been taken and we strongly believe that the scale of growth in the local plan as submitted was a bold attempt to fully meet OAN, and our local needs as a community, in very challenging circumstances.

For the Guildford Local Plan to be adopted by this Council it has to achieve an appropriate balance between meeting the needs of the borough in terms of housing, employment and retail in a sustainable way whilst protecting the character of the borough. We are pleased that the plan as originally submitted by ourselves, after much public consultation, has been found fundamentally sound at the end of the Local Plan hearing sessions.

However, the Guildford Borough Council Executive have serious concerns in relation to the inclusion of the additional, highly sensitive Green Belt sites and the resulting rate of housing delivery over the first five years of the plan that is necessary to achieve a robust rolling five year land supply. It is widely recognised within Government that as a Local Planning Authority we currently have no means of forcing developers to build at the rates presented during the public hearing sessions.

We therefore welcome the updated household projections, which demonstrate that our OAN is reduced from that assessed during the hearing sessions. Lowering the housing requirement in the plan would enable us to meet our housing needs in the early years without a phased approach. It would also ensure that the adopted plan is robust and deliverable, and will not be rendered out of date soon after adoption should delivery not meet the significant rates required by the plan with main modifications. We require a sustainable plan that achieves good design and delivers sufficient housing, employment, retail and most importantly new infrastructure to be built out for the benefit of the existing community as well as new members of the community. Whilst Guildford Borough Council intends to deliver a significant level of supporting infrastructure ourselves, we require a Local Plan that sets out the requirements for developers and our partners in order to deliver this sustainable growth.

We therefore ask you to consider and act on the following:
1. We ask that you review and amend the plan in light of the new household formation figures by amending the housing requirement to reflect the latest evidence.

2. The Executive have never accepted that there is a real ‘unmet need’ in Woking as a comprehensive borough wide Green Belt and Countryside study has not been undertaken by Woking BC. Furthermore, following the approval by Woking BC of their Core Strategy Review at their Full Council on 18 October, there is now confirmation by Woking BC that there is no unmet need arising from Woking. We therefore ask that all additional numbers applied to the Guildford Local Plan to meet this perceived need be removed from the plan to enable the Executive to recommend adoption.

3. As a result of the reduced OAN and bearing in mind that we have no realistic means of forcing early delivery on allocated sites, we ask that you remove all new green belt sites proposed during the hearing sessions as these are no longer necessary to meeting housing need in the early years. Instead, we ask that you accept the sites and rates of delivery proposed by the Council in the Submission Local Plan to ensure that the plan continues to be sound after it is adopted.

Whilst we require a new Local Plan as soon as possible, we accept that given the latest 2016-based household projections published very recently by ONS and the significant impact upon Guildford’s OAN, there may be a requirement for a further delay and the possibility of another hearing, and we accept that position. We also accept that there is a genuine housing crisis in our Borough and a serious deficit in Infrastructure.

It is important for all who live in, work in or travel through Guildford’s borough that a sound, sustainable and fair Local Plan is adopted.

Executive Members:

Councillor Matt Furniss
Councillor David Bilbe
Councillor Philip Brooker
Councillor Geoff Davis
Councillor Graham Ellwood
Councillor Gordon Jackson
Councillor Nigel Manning
Councillor Nikki Nelson-Smith
Councillor Iseult Roche
Councillor Jo Randall
Councillor David Wright

Attached documents:

Comment: MM2 - LPMM18/6006  Respondent: Barratt Developments Plc (Giuseppe Zanre) 20863329  Agent:
1.1. Barratt David Wilson – Southern Counties (hereafter “BDW”) has prepared this Representation to the consultation on the Main Modifications of the Draft Local Plan for Guildford Borough Council (GBC).

1.2. Following examination of the Draft Local Plan in July 2018, a need was identified to allocate one or more additional sites, sufficient to provide for c.550 homes within the first five years following plan Adoption, in order for the plan to be found ‘sound’ by the Planning Inspector. This consultation response has been prepared upon review of the Main Modifications which the Council is proposing to submit to the Planning Inspectorate for re-examination.

1.3. GBC are currently committed to a delivery timescale that will see their Plan Adopted in late March 2019. The original National Planning Policy Framework (NPPF) came into force in March 2012. On 24 July 2018 the NPPF Revision was published. From the date of publication of the NPPF Revision there is a transitional period of 6 months which applies, enabling those Local Planning Authorities (LPAs) who have progressed their Plan to continue through the examination process under the 2012 NPPF. This timeframe expires on the 24th January 2019.

1.4. The Inspector’s guidance note ID6 recognised a need to identify packages of sites to deliver c.550 homes in the first five years of the plan period. The GBC’s reappraisal process identified the most appropriate candidates for realistically increasing the supply of homes in the early years of the plan. Five sites were identified by GBC equating to an increase of 655 homes, with it being estimated that at least 555 homes would be delivered within the first five years following Adoption of the plan.

1.5. One of these five reappraised Sites is ‘Land West of Alderton’s Farm, Send Marsh’ (Site 29/Policy A63). The allocation would be for c.120 homes and would represent a sustainable development that will have a limited visual impact on the Green Belt, and its location, and will ensure the continued health and sustainability of Send Marsh as a settlement.

1.6. BDW has a legal interest in the site and are supporting GBC in its proposal to include ‘Land West of Alderton’s Farm, Send Marsh’ (Site 29/Policy A63) as a site allocation in the Local Plan. BDW confirm that there are no fundamental issues, and it is entirely realistic that the housing could be provided on this site within 18 months, and completed within the first five years of the plan period.

1.7. GBC have assessed the Site, weighted the impact on the ‘amber Green Belt’ status, considered benefits from the provision of a 14.3ha SANG (Suitable Alternative Natural Greenspace), and revisited the previous appraisals and consultations completed in 2016 and 2017. All of the analysis has led to the conclusion that the Site should be included, and this stance is wholly Supported by this Representation.

1.8. In addition to the background evidence compiled by GBC, BDW has undertaken its own assessments of the site to confirm that there are no issues that cannot be overcome or that would impede implementation of the development. In addition to the background evidence compiled by GBC, BDW has undertaken its own assessments of the site to confirm that there are no issues that cannot be overcome or that would impede implementation of the development. These include a Transport Assessment (2013), Archaeology and Heritage Assessment (2014), Ecological Report (2014) and Landscape Visual Appraisal (2014)

1.9. Following the implementation of the Modifications, the draft Local Plan will be consistent with National Planning Policy. The Site upon which this Representation is based has been assessed appropriately, and the inclusion of land to the west of Alderton’s Farm (Site 29) for the development of housing is Supported in the proposed Policy A63. This Allocation is given credence by the evidence base prepared by GBC and added to through this representation. This Representation Supports the Allocation of land to the west of Alderton’s Farm, Send Marsh for c.120 new homes, as it is a positive step that will help meet the need for housing across the Borough and will help to deliver a sustainable level of growth to Send Marsh.

2. The Purpose of the Representations

2.1. These Representations support the proposed Allocated Site (Policy A63) within the Main Modifications of the Emerging Local Plan, at Land to the West of Alderton’s Farm, Send Marsh Road, herein referred to as “the Site”.
2.2. The representations confirm that the Site is deliverable and that BDW have a legal interest in the Site. Subject to the Allocation and planning permission being granted, BDW intend on implementing the development as soon as possible, with all homes delivered in the first five years of the plan period.

2.3. Paragraph 182 of the NPPF (2012) sets out the four tests to ensuring a sound Plan:

   a) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
   
   b) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
   
   c) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
   
   d) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in this Framework”

2.4. These Representations Support the evidence base upon which some of the emerging Policies have been based, in order to ensure that the above tests of soundness are met.

3. **The Site**

3.1. The Site is split into two key components, the residential parcel of land which comprises an area of some 6.35ha and the SANG parcel to the west of the site which comprises an area of some 14.3ha.

3.2. The Site is located within the administrative boundary of Guildford Borough Council (GBC). The Site is currently adjacent to the defined settlement boundary of Send Marsh, and designated as land within the Green Belt.

3.3. It is classified as falling within Flood Zone 1, with a very low risk of flooding from rivers, and also located in an area of very low risk from surface water flooding.

3.4. The settlement of Send Marsh contains a small number of listed buildings, although does not contain a Conservation Area. The Site is located in close proximity to the listed farm building at Alderton’s Farm.

3.5. The proposed residential element of the Site comprises two fields which are demarcated by boundary fencing or mature planting and hedgerows. The Site is adjacent to the existing settlement boundary of Send Marsh eastern and southern boundaries, and is shown in its wider context below:

   [see attachment for photograph]

**Figure 1: Site Plan**

3.6. The topography of the Site is that of a broadly flat area with the SANG element of the Site, at some 14.3ha, of a similar topography. In terms of a Site specific location within Send Marsh, the Site is bordered to the north by Send Marsh Road, to the east by residential development off Green Drive, to the south by Boughton Hall Avenue, and beyond the proposed SANG to the west by Send Barns Lane.

3.7. It is within easy access of the local road network serving the area, being approximately 750m away from the A247 to the west which is a further 1 mile north of the A3 trunk road, and is located such that there is easy access to nearby villages and towns, such as Guildford (6km to the southwest), Woking (4km to the north) and Send (1km to the west).

3.8. The Site is categorised as Rural Character Area E2 (Wooded Rolling Claylands) and any opportunities to preserve and enhance this character area will be explored through the formulation of a Planning Application. The ‘Indicative Layout’ shows ample promotion of local green linkages along with the aforementioned provision of the Suitable Alternative Natural Greenspace (SANG).

3.9. The Site is also located in close proximity to existing public transport, with a bus stop approximately 200m away to the west at Alderton Farm and 150m to the west at Send Marsh Green. These bus stops offer regular bus services to Guildford, Woking, Clandon, Merrow and Burpham. Whilst there is no train line or train service available from Send
Marsh, the nearest stations are located in Worplesdon and Woking, approximately 4.5km and 4.1km from the Site respectively). From here, train services to London Waterloo, Basingstoke and Portsmouth Harbour with London-bound services operating approximately every 10 minutes during peak time.

3.10. Within Guildford Borough, Send Marsh is identified in the Settlement Hierarchy (2014) as a ‘Large Village, alongside Pirbright, Shalford, Chilworth, Effingham, Ripley, Fairlands, Wood Street, West Horsley, Peaslake and Send itself. Send Marsh’s designation is cited as being due to the population and close proximity to the services in Send.

4. Proposal

4.1. The proposed development of the Site for a residential-led scheme will be designed appropriately to take account of existing site features and environmental constraints. Initial master planning includes the provision of a large SANG to the west of the residential parcel. Open space and play areas will also be incorporated in the residential parcel of the Site. The development on the Site will be influenced by its surroundings and the following key considerations:

- Sensitive clear boundaries separating the Site from the wider surrounding area;
- Planting and retention of mature boundaries as far as possible to screen from adjacent residential area;
- Inclusion of a 14ha SANG to be linked to the existing PROW network to the north, south and west;
- Creation of open space and a nature walk/amenity area within the site; and
- Appropriate densities to respond to the northern and western extents of the Site.

4.2. The design of the proposed development will be informed by Landscape, Highways, Heritage and Ecological specialists. This will allow the proposal to respond effectively to the Site’s constraints. A number of preliminary reports and assessments have already been undertaken in informing the indicative master plan at Appendix 1.

4.3. The promotion document, illustrating indicative proposals for the site is provided at Appendix 1, demonstrating that the developable area on site can accommodate 120 dwellings as set out in the proposed Policy A63. Many of the reports were produced in 2014 to inform the Indicative Masterplan, all technical reports will be refreshed and updated at the relevant time prior to the submission of a Planning Application.

4.4. BDW is proposing the following to be provided on the site:

- Provision of c. 120 dwellings; and
- Provision of 14ha SANG with sensitive landscaping features and connections to existing PROW network

5. National Planning Policy Position

5.1. This section sets out the Planning Policy context for the Site, given that the overarching National Planning Policy Framework has been revised during the formulation of the Emerging Plan.

National Planning Policy Framework

5.2. The original National Planning Policy Framework (NPPF) came into force in March 2012. On 24 July 2018 the NPPF Revision was published. The NPPF Revision is a material planning consideration in the Plan making and decision-taking processes.

5.3. From the date of publication of the NPPF Revision (24 July 2018) there is a transitional period of 6 months which applies, enabling those Local Planning Authorities (LPAs) who have progressed their Plan to continue through the examination process under the 2012 NPPF. This timeframe expires on the 24th January 2019. Beyond this time, the NPPF Revision will apply.

5.4. GBC is currently committed to a delivery timescale that saw their Plan submitted to the Secretary of State on 13 December 2017, prior the 24 January 2019 deadline. As ‘Main Modifications’ form part of the examination process, the 2012 NPPF Policies and housing targets that were in place through the formulation of the Plan and during the Examination Hearings will apply, and will be considered in this representation. BDW is confident in their ability to contribution to the Council’s expectations regarding fiveyear housing delivery, in line with these National Policies.
6. Housing Needs and Provision

6.1. GBC’s publication of the Main Modifications to the Emerging Local Plan identifies:

- A housing need of 12,600 over the course of the Plan period of 2013-2021 (672 per annum post-2019 taking into account an allowance of 42 dwellings per annum toward meeting unmet need from Woking Borough);
- The preferred approach is to provide housing within urban areas, areas around villages, extensions to Guildford and in new settlements or on sites already identified or allocated;
- The land supply identified includes 3,675 commitments and approximately 9,972 site allocations already accommodated for since the start of the plan period; and
- The Local Plan sets out an allocation of 620 dwellings on sites identified in the LAA, and anticipates a windfall allowance of 750 dwellings over the remaining plan period.

6.2. In determining additional allocations, GBC ruled out sites which were anticipated to be delivered within years 6-10 of the plan period, and this included ruling out two additional urban extensions of Guildford for this reason.

6.3. GBC considered the spatial option most likely to boost early delivery was through greater provision in and around inset villages due to their smaller scale, lower infrastructure dependency and dispersed nature.

6.4. Following the Local Plan examination, GBC considers that a boost to early delivery would be most realistically achieved through the allocation of additional village extension sites. This balance of Green Belt harm and exceptional circumstances for removal additional sites from the Green Belt was considered in light of the Inspector’s views in relation to objectively assessed need and early delivery. Alderton’s Farm at Send Marsh was selected as one of the three sites best suited to increase early delivery.

Affordable Housing

6.5. The National housing crisis has characterised the housing market for many decades and is steadily heightening; the crisis is now compounded by a lack of affordability. The Office of National Statistics (ONS) has shown that the mean affordability ratio, based on median house price to median income, is 11.6; that is to say median house prices are 11.6 times median income.

6.6. There has not been a specific local housing need assessment conducted on Send Marsh. However, it can be seen in Table 3.1 of the Sustainability Assessment of the Guildford Local Plan (Sept 2018 Addendum) that “there is a deficit in affordable housing supply and the current completion rate is below the annual level required to address the deficit”.

6.7. The proposal on Land West of Alderton’s Farm will deliver Affordable Housing at a level of 40% of the development, in accordance with the Emerging Local Plan policies. This will be delivered in accordance with the definition of affordable housing as provided in the glossary to the NPPF and to reflect local need. Evidently, in an area where there is a clear shortage of affordable homes, this proposal will make a valuable contribution.

Conclusion

6.8. GBC needs to ensure that a suitable range of sites, of varying sizes and scales, are allocated in the Emerging Plan to ensure the early delivery of a sufficient number of new homes to address the under delivery against the 5 year requirements. GBC needs to ensure that the Plan is flexible and able to meet the demands on it both in terms of providing for need but also delivering at a sufficient rate.

6.9. Send Marsh has been identified as a large village settlement in the settlement hierarchy (below Guildford and Ash urban areas and East Horsley rural centre), and represents one of the most sustainable locations for development in the Borough.

6.10. Land to the West of Alderton’s Farm has been identified, assessed, and found to be one of the preferred sites to deliver sustainable development to the settlement of Send Marsh by the Council. The inclusion of land to the west of Alderton’s Farm will enable BDW to deliver a Site in the Borough that would on a local scale provide a suitable and sustainable level of development, with a policy-compliant provision of Affordable Housing and a 14ha SANG that will contribute to addressing the housing needs of the area.
not only mitigate the impacts of the development itself but provide capacity for c.400 homes within a 4km catchment area.

6.11. The Site forms part of the Council preferred option (3) as outlined in the SA of the Guildford Local Plan (Sept 2018) which involves one larger urban extension (Aaron’s Hill, Godalming) alongside a package of smaller extensions with strong delivery certainty. The option reflects the Inspector’s recommendations to ‘align the spatial strategy of the Borough whilst recognising the need to apply flexibility in response to competing objectives’. Option 3 avoids performing notably poorly in any of the topic headings outlined in the SA and there is a confidence that the sites not only represent sustainable development but, on balance, provide sufficient opportunities to avoid or mitigate against any identified level of significant and demonstrable harm and much needed contribution to meeting identified housing needs within the first 5 years of the Plan period.

Attached documents:  🗄️ Barratt Developments Rep_Redacted.pdf (7.2 MB)

7. Draft Policy A63

7.1. The vision for the Site is for the delivery of c.120 dwellings in line with proposed Policy A63, with the proposed retention of a central area of greenspace and the provision of a 14ha SANG adjacent to the Site. This off-site provision would enhance the ability of the residents of Send Marsh to interact with the natural environment and enjoy the 2.3km circular walk provided within the Site. This is shown indicatively in the accompanying proposal Brochure prepared by Lytle Associates (Appendix 1), and confirms that the required level of residential and natural development can be appropriately accommodated on Site.

7.2. Policy A63’s wording is limited in its descriptive capacity for the Site; however, it clarifies that this Site is allocated for approximately 120 homes (C3), including some self-build and custom house building plots; the requirements for development are (1) sensitive design at site boundaries that has significant regard to the transition from village to greenfield and (2) no unacceptable impact on trees and hedgerows; with opportunities presented by the development in terms of (1) green corridors and linkages to habitats outside of the site and (2) connections with services and facilities in the village.

7.3. BDW currently provide similar opportunities for custom build/self-build plots on their developments although via the capacity for allowing purchases to change, within certain limits, internal specifications if they purchase off-plan or reserve early in the build process. In this regard BDW suggests the Policy wording should be amended to include the proviso that self-build / custom house building plots should only be provided where possible and where the option is provided by the developer.

7.4. BDW has already undertaken site specific assessment in terms of ecology, landscape and heritage to inform an indicative masterplan for the site (see Appendix 1). Through careful detailed design it will be possible to ensure the development is sensitive, particularly at the Site boundaries to create an attractive transition between village and greenfield. This includes the potential for green corridors and linkages to be created to habitats outside of the Site.

7.5. The land at Allocation Site A63 is able to be brought forward in the first five years of the plan period. It is under single ownership with no legal or ownership barriers that could prevent the Site coming forward. BDW is one of the Nation’s largest housebuilders and it is envisaged that housing will be delivered on the Site within 18 months of a Planning Application being submitted.

7.6. Below is an ‘Indicative planning’ timeframe to demonstrate that within 18 months of submission of a full planning application, first occupations could occur and start delivering housing numbers to the Borough.
• Day 1 - Submission of full planning application for circa 120 dwellings and accompanying SANG
• Month 7 – signing of S106 and issuing of Decision Notice
• Months 7 - 11 – submission of information pursuant to planning conditions, approval of planning conditions and legal completion of Site
• Month 12 – Site start (residential and SANG)
• Month 15/16 – SANG completion
• Month 18 – first occupations

Suitability of the Site

7.7. BDW has a legal interest in the Site and there is additional land available for a SANG. The Site’s identification surfaced from the GBC’s ‘Green Belt and Countryside Study’ (2014) in which Send Marsh was identified as a potential “major village expansion site within the Green Belt within Guildford Borough” as the “sustainability credentials were considered to outweigh the potential; harm to the openness and purposes of the Green Belt”.

7.8. The Report cites the sustainability benefits of the village’s growth, in terms of new local centres, community halls, and amenity open spaces absent from similar villages in the Borough. The benefits of the established infrastructure network identified within this report are repeated within the 2014 study and the extension of the village is not considered to lead to settlement coalescence or historic setting, avoiding a compromise of Green Belt purposes 2 and 4.

7.9. The 2014 SHLAA completed in support of the Draft Plan identified a deliverability timeframe of the site of 0-5 years stating that the future development of the site would be suitable if sufficient deliverable home outside of the Green Belt is not identified.

7.10. As stated, the assessment of the Site found that the Site has good transport links and will ensure the ongoing sustainability of the village through the provision of additional housing, a SANG and a provision of Affordable dwellings. The design of any development would need to account for the surrounding Green Belt location, as well as accounting for any existing biodiversity on the Site through surveys and mitigation as appropriate.

7.11. A Transport Assessment was completed as to the suitability and safety Send Marsh Road for a residential development on the farm site itself in 2013. A site-specific Transport Assessment will be completed for this scheme although several conclusions can be drawn from the adjacent assessment. The Site’s access will utilise the field existing access point with the development entering Send Marsh Road. The Report finds that the Site is acceptable by a variety of modes of transport with the potential to reduce reliance upon the private car. This Conclusion has arisen due to the Site’s proximity of bus stops and wider connectivity with railway hubs as well as the lightly trafficked roads in the vicinity of the Site ensuring that cycling is a reasonable alternative to travelling by private car.

7.12. An Archaeological study and Heritage Assessment were completed in 2014 to better inform the evolution of the residential development on the Site. There are seven Grade-II listed buildings within 500m of the Site with the closest, Alderton’s Farm, located on the plot of land adjacent to the Site.

7.13. In response to the Indicative layout shown in Appendix 1, the Heritage Assessment Concludes that the development cannot be regarded as caused substantial harm to the Alderton’s Farmhouse, or its setting. The Assessment states that ‘there is no or extremely limited intervisibility between the listed building and the Site, and weak evidential and historical association’.

7.14. The Scheduled Ancient Monument (SAM) located 350m from the Site boundary will also not be affected. The low density development proposed on the western part of the site will be screened by dense planting and will have minimal impact on views of the aforementioned monument. The assessment finds that the provision of much needed housing including Affordable housing, in a sensitive manner and location outweighs the less than substantial harm caused to the surrounding designated heritage assets. The archaeological assessment concludes that the Site may have Medieval or prehistoric archaeological potential; however, the impact on the SAM is likely to be low due to the proposed planting, separation and proposed density on the relevant boundary. On this basis, the impact on Heritage would be limited and can be mitigated through a sensitive design and layout.
7.15. In terms of Ecological constraints within the Site, an Ecological report was completed which was found to support Low ecological potential. The Report stated that the semi-improved grasslands which dominate the site are species-poor and of low ecological value. However, the large trees along the western boundary are likely to form a habitat resource for a range of species; these would be retained as far as possible as part of the master planning for the Site.

7.16. The existing hedgerows provide potential for bats, birds, badgers and invertebrates and a pond within 250m of the site may have potential for Great Crested Newt habitats. Further ecological assessments will be undertaken and biodiversity enhancement measures will be incorporated into the development to ensure minimal impact on biodiversity results from the scheme. The Report states that the habitat creation and enhancement within areas of open space could deliver substantial benefits to the overall ecological value of the Site and so the impact on local biodiversity will be appropriately mitigated and would not preclude development of the Site.

7.17. Discussions were held with Natural England regarding the proposal inclusion of the SANG adjacent to the residential element of the scheme. NE stated that, following review of a revised SANG plan, the Site offers the potential to meet all of NE’s SANG guidelines, including the requirement for an uncontrived circular walk of 2.3-2.5km. NE advised therefore that the proposed bespoke SANG is acceptable ‘in principle’.

7.18. Regarding Landscape Impact, a preliminary Landscape Appraisal was prepared in 2014 by David Williams Landscape Consultancy to support the formulation of a landscape-sensitive scheme on the Site. The appraisal assessed Site visibility, trees, access, landscape character and landscape planning and was accompanied by a constraints/opportunities plan. The assessment arrived at the following conclusions which will be used to inform the master planning of the Site:

- The proposal to include land to the west as SANGS land would be seen as a benefit to the scheme.
- The Site is surrounded by defensive boundaries with partial visual enclosure. The Site is relatively unconstrained in environmental capacity terms.
- Any hedge removed to create any additional access width should be replanted to maintain the character of the road on the approach to Send Marsh.
- There are opportunities to increase tree cover and enhancement wildlife/habitats within the Site.
- Views from the surrounding area are limited due to low lying topography and a natural containment of the Site by housing to the north, east and south and a tree belt to the west.
- The Site is devoid of any other significant vegetation aside from grassland and boundary trees/hedgerows.
- Careful consideration should be given to the density, scale and type of development within the Site; additional planting could be provided along the Site’s boundaries to reduce views and minimize the likely visual effects.
- The option of providing further internal planting should be explored to create a suitable attractive and pleasant landscape environment for residence.

7.19. Overall, the 2018 Local Plan’s Main Modifications and the October 2018 addendum to the Land Availability Assessment (LAA), supported by the Green Belt and Countryside Study (2014), found that the Site is suitable for housing development and that the development could be delivered within the first five years of the Plan Period, subject to other considerations being fully addressed. The Technical Reports prepared thus far do not raise any significant issues that will delay the delivery of the site or submission of the Application.

7.20. Any assessment of land availability to identify a land supply for the future delivery of housing needs to ensure that the Site is not only suitable, but also available and achievable. The October 2018 LAA addresses these items in limited detail, however the Planning Practice Guidance does offer further direction as to how availability and achievability can be assessed, this is confirmed below;

**Availability**

7.21. The PPG (Ref ID: 3-020-20140306) identifies that “a site is considered available for development, when, on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership problems…”
7.22. The Site ownership is listed as available for development with the delivery record stating that the Site is under the control of BDW.

**Achievability**

7.23. The PPG (Ref ID: 3-021-20140306) states that “a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time”.

7.24. Similarly, BDW will likely complete the development within 3 years of the submission of an Application. The LAA is realistic in its assumption that the development could be achieved within the next five years given it is already within the control of a house builder who is seeking to submit a planning application to the Council following the adoption of the Local Plan. This is concurrent with the previous 2014 estimations of delivery timescales on the Site.

**Summary**

7.25. The Site is a tier three settlement (large village) that is located in a sustainable location, is suitable, available and achievable, and therefore deliverable over the Plan period. Given the deliverability of Land to the West of Alderton’s Farm, the sustainable location of the Site, and the identified shortfall in meeting its five year housing land supply requirement, GBC are supported in including this site as an allocation. This will help to ensure that GBC meets its housing need over the Plan period, and that Send Marsh remains a sustainable settlement with an area-defining area of open space that would be an extremely convenient alternative to the Thames Basin Heaths Special Protection Area (TBH SPA) for future residents of the new homes as well as being wholly accessible for the residents of Send Marsh.

7.26. The management of the Site once it is designated as a SANG, which would be privately managed, would bring significant nature conservation enhancements not otherwise enjoyed by the site at present. Furthermore, the SANG would ensure the ongoing preservation of the TBH SPA by preventing a potential increase in visitor pressure having a significant detrimental effect on its integrity. Indicative plans show that the SANG would provide visual variation and interest, and the linkages to the area’s extensive footpath network would be of benefit to the residents of neighbouring villages of Send, Ripley and Pyrford.

**Sustainability Appraisal**

7.27. The 2018 Sustainability Appraisal (SA) addendum on the proposed Main Modifications of the Guildford Local Plan is supported in principle on the basis that it recognises in the assessment of Send Marsh generally that it shows greater potential than other village Green Belt sites to direct housing growth and in transport / sustainable development terms.

7.28. The SA also clearly recognises Send Marsh as having three potential sites to which direct growth; the SA rules the site at Land South of Tannery Lane (50 dwellings) as least preferable, with Land at Polesdon Lane/Send Marsh Road (50 dwellings) and Land West of Alderton’s Farm (120 dwellings) proving most appropriate. The combination of these two remaining sites is deemed as problematic due to delivery risk and in-combination effects on local heritage. The smaller, Polesdon Lane/Send Marsh road site is located within red-rated Green Belt within proximity to listed buildings and a SSSI although distant from a local centre of bus services.

7.29. Land west of Alderton’s Farm, is similarly in proximity to heritage and ecological assets but comprises amber-rated Green Belt and better located for wider transport links. The SA recommends that walking/cycling links at Alderton’s Farm, including to Send Primary School and the GP surgery, and to the bus services on the Portsmouth Road are given consideration.

7.30. The 2018 SA addendum outlines GBC’s preferred option (3) for additional housing allocations, in-light of alternatives presented. Option 3, as stated previously, combines a larger development at Aaron’s Hill, Godalming (200 dwellings) with a package of smaller extensions to villages associated with strong delivery certainty.

7.31. The Site specific assessment of Option 3, as conducted as part of the 2018 SA addendum, assesses the Site against all Sustainability Objectives, and concludes that of the 17 objectives, whilst numerous elements are deemed to be positive (most preferentially under the headings of housing and brownfield) or the impact could be resolved dependant on strategy or Policy, only two are considered to register tensions with the objective, transport and climate change. The same order of
preference applies to these two topics due to the broad focus of their discussion, namely access to key destinations; it is here that larger settlement extensions are preferred to smaller village extensions.

7.32. Overall, the SA supports GBCs proposed package of sites within preferred option 3, and BDW Supports its Conclusions that it represents sustainable development with the ability to avoid or mitigate any harmful effects (and capitalise on opportunities) through the development management process.

Benefits

7.33. The delivery of the Site will assist in addressing existing, established social and infrastructural deficiencies in the community through providing a SANG and enhancing the existing Public Right of Way network.

7.34. The delivery of the Site will ensure that the growth of Send Marsh is in line with its historic and projected population growth, ensuring a sustainable level of growth and the continued health of Send Marsh as an important satellite settlement to the larger settlement of Send.

7.35. Allocation of the Site will help to ensure that GBC meet their housing target, delivering homes within the first five year of the Local Plan,

7.36. Overall the Allocation and development of land to the west of Alderton’s Farm for c.120 new homes presents an excellent opportunity for both the delivery of market housing, affordable housing, and the enhancement of community and biodiversity infrastructure to Send Marsh.

8. Conclusion

8.1. These Representations have been prepared by BDW in light of land to the West of Alderton’s Farm, which provides the opportunity for delivery of a residential-led scheme providing:

- c. 120 new homes, with 40% affordable housing,
- Provision of 14ha SANG with sensitive landscaping features and connections to existing PROW network

8.2. Send Marsh is located within Guildford Borough. The majority of GBC is covered by a Green Belt designation with two of the largest urban areas (Ash and Guildford) enveloped by Green Belt. Whilst this does leave other urban areas outside of the Green Belt, achieving balanced growth across the District, and ensuring the continued sustainability of existing settlements located within the designation, will not be possible to achieve without a level of development occurring within the Green Belt itself.

8.3. In order to ensure that any development that occurs in the Green Belt is sustainable, it will need to be closely located to the existing settlements and settlement boundaries and ensure that any development has a minimal impact on the Green Belt, both in a local sense and with regard to the impact of any development upon wider views.

8.4. The proposed Allocation of land to the West of Alderton’s Farm for the development of approximately 120 dwellings and provision of a 14ha SANG represents sustainable development that will have a minimal harmful impact upon the Green Belt and will ensure the continued health and sustainability of Send Marsh as a settlement. GBC has assessed the Site and examined the impact development on the Site will have on the Green Belt. All of the analysis has led to the Conclusion that the Site should be included, and this stance is wholly Supported by this Representation and BDW.

8.5. Overall, the Site has been assessed appropriately, and the inclusion of land to the west of Alderton’s Farm for the development of housing is Supported in the proposed Policy A63, which is backed up by the evidence base prepared by GBC, scrutinised and modified by the Planning Inspectorate and added to through this representation.

8.6. This Representation Supports the Allocation of land to the west of Alderton’s Farm, as it is a positive step that will help meet a recognised need for market and affordable housing across the District, and will help to deliver a sustainable level of growth to Send Marsh whilst providing a substantial area of open space that would be an extremely convenient alternative to the TBH SPA for future residents of the new homes as well as being accessible for the residents of Send Marsh.
8.7. BDW can confirm that the Site is achievable and available, and are confident that it will be delivered within the next five years.

for appendix see attachment

Attached documents:  [Barratt Developments Rep_Redacted.pdf](https://example.com) (7.2 MB)

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**Comment: MM2 - LPMM18/6045  Respondent: Michael R Bennett 20865729  Agent:**

- The revised Housing Need figures mean that much proposed greenbelt development is no longer justified, and the “exceptional circumstances” that are required as grounds to allow greenbelt development do not exist.
- The Council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

MM2 The Examination should be re-opened because the housing figures are no longer up to date, do not provide a sound basis for the Plan or justify such extensive Green Belt loss.

MM2 There is a strong case for taking out a strategic site and more scope for timely town centre provision. This makes table (S2b), which identifies types of site to be developed, out of date and in need of re-examination.

MM2 Expert Neil MacDonald has demonstrated that about 360 homes a year would support the ambitious economic growth rate proposed by the inspector. 630 homes a year would be out of step with the new ONS figures and the Government’s standard method. 630 is based on inappropriate assumptions that inflate the figure eg excessive student homes in town, low economic participation.

MM2 It is inappropriate to expect Guildford to sacrifice Green Belt to provide homes for Woking when Guildford is more constrained, Woking is proposing Green Belt development, plus Woking’s need figure has also reduced and has not been examined.

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**Comment: MM23 - LPMM18/6050  Respondent: Michael R Bennett 20865729  Agent:**

MM23 policy D1 (place shaping). Guildford Borough Council, as major landowner in the centre, must accept the same obligations as imposed on other strategic site owners by the council as planning authority.

MM23 should place great emphasis on height and bulk of development given the importance of views into and out of the town, including from the AONB. A height limit should be introduced given the importance of the rise and fall of the downs in the urban landscape.

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**Comment: MM27 - LPMM18/6049  Respondent: Michael R Bennett 20865729  Agent:**
MM27 Simply widening part of the A3 is an inadequate response to current congestion. More radical solutions should be considered such as a tunnel or mechanisms to actively reduce peak time single car usage and to promote and facilitate travel to school by staff and pupils by other than private car. Major Greenbelt development should not be commenced until traffic congestion has been reduced below its current level.

Attached documents:

Comment: MM3 - LPMM18/6047  Respondent: Michael R Bennett 20865729   Agent:

- Proper planning of the town centre would help to promote more relevant sensitive development. The hastily added section is based on pre-Internet retail models and numbers.
- There is no policy dealing with urban areas beyond the town centre such as the one where we live.

MM3 policy S3. Guildford Borough Council must deliver real and coordinated results. The town centre must be designated a strategic site, or sites.

MM3 policy S3. Guildford must have an effective local plan. Relevant rules must ensure quality of development across the town centre. Rules should be quantitative where possible and not nearly bland urgings of high-quality development as at present which are meaningless.

MM3 policy S3. At morning and evening peak times Guildford is one of the most congested towns in the UK and Europe. Much greater priority should be given to improving and creating safe and attractive pedestrian and cycle routes. Proper consideration should be given to Guildford Vision Group’s proposal for an additional river crossing to relieve congestion on the one-way system.

MM3 There should be a policy (S4) on the urban areas beyond the town centre to prevent inappropriate garden grabbing and to encourage a joined-up approach to site assembly in carefully selected residential areas where redevelopment linked to enhancement might be appropriate.

MM3 In (5) new town centre development should avoid adverse impact on surrounding residential areas.

- There are few concrete proposals for reducing congestion. Where there are any, these are outside Guildford’s control, like widening the A3, and therefore there is nothing really to prevent the major greenbelt development taking place irrespective of the congestion.

Attached documents:

Comment: MM31 - LPMM18/6051  Respondent: Michael R Bennett 20865729   Agent:

MM31 on North Street should be amended to reflect the more flexible and less specific approach of promoting mixed use development in MM18. Placing so much retail floorspace in one site is an outdated model, would threaten the viability of existing retail, including the High Street, and the scope for retail as part of other new mixed development.

MM31 A height limit for North Street is required.

MM31 Where is the allocation for an all-direction bus interchange?

Attached documents:
Thank you for your email asking for comments on the Guildford Local Plan. SGN is preparing for the next Price Control Period (RIIO-GD2), due to commence 2021, and welcomes all input from Local Authorities that provides intelligence on proposed development within their respective areas. This information will assist us in identifying potential growth and associated reinforcement requirements.

SGN has carried out a high level assessment of the impact of developments contained within the Local Plan, Housing Land Audit and Employment Land Supply documents and can comment as follows:

**NETWORK OVERVIEW**

SGN’s network within Guildford District Council, areas is energized by the South Local Transmission System (LTS) with and supported by the integrated IPMP system. Transmission Regulator Stations (TRS) are located across the center of the region, reducing pressure to the High Pressure (HP) Intermediate (IP) and Medium (MP) pressure systems. In some instances pressure is reduced from IP to MP by means of District Pressure Governors (DPG). In turn, the IP/MP systems are further broken down to Low Pressure (LP) systems directly supplying the majority of existing domestic customers.

**STRATEGIC DEVELOPMENT AREAS**

Through the assessment of the impact of developments there are no areas of significant concern - which result in the requirement of network reinforcement. There is no new reinforcement required from the latest local plan or sites which may have significant impact, compared to the potential existing ones. SGN’s infrastructure will not be severely affected from the additional developments described on the latest local plan.

Below is a short synopsis of the networks supplying these areas where reinforcement may be required in the medium and long term.

For the district area, reinforcement of the IP/MP Grid will be required, if gas is to play a major role in meeting the energy requirements of any potential developments identified in the local plans. If said developments are phased as set out in the various LDPs, then the reinforcements will be necessary in ensuring that security of supply is maintained. It is of paramount importance to stress that the timelines and capacities that are quoted in the various LDP documents are not concrete and are, therefore, subject to change such as the reinforcements accompanying them.

**STATUTORY OBLIGATIONS**

Where required, SGN will look to manage the provision of any off site infrastructure improvements, in line with the overall development growth and/ or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for IPMP networks, and will only become clear once a developer’s request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN’s existing mains system, but may also include the installation of above ground apparatus involving land purchase.

As this is a high level assessment and response, the information provided is indicative only and should be used as a guide to assist you on your assessment. While information obtained through consolation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the department of our gas network arise from the Gas Act 1986 (as amended), an extract of which is given below:-

**Section 9 (1) and (2) which provides that:**

9. **General powers and duties**

(1) **It shall be the duty of a gas transporter as respects each authorised area of his:-**
(a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and

(b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him -

(i.) to connect to that system, and convey gas by means of that system to, any premises; or

(ii.) to connect to that system a pipe-line system operated by an authorised transporter.

(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.

(2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -

(a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.

SGN would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.

As SGN is the owner and operator of significant gas infrastructure within the Guildford area and due to license holder obligations;

- Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer.
- Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process.

SGN would therefore request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted.

Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.

Please let me know if the above information is sufficient for your requirements at present.

Attached documents:

Comment: MM2 - LPMM18/6060  Respondent: Jasper Collinson Warr 20866977  Agent:

The council has not properly observed its hierarchy of development. Brownfield opportunities, especially in the town centre, have not been fully exploited.

Housing numbers should reflect the latest much lower ONS figures and projections. The public hearings should be re-opened on this subject to allow re-examination.

The grounds for green belt development are inadequate because of 1 and 3 and do not represent ‘exceptional circumstances’

Special reference to MM2
I most respectfully request that for these reasons you will see fit to reopen the examination of the Guildford Local Plan as indeed other local plans have been when found unsound based on outdated information.

**Attached documents:**

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<tr>
<th>Comment: MM3 - LPMM18/6062</th>
<th><strong>Respondent:</strong> Jasper Collinson Warr 20866977</th>
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<td>MM13. The allocation of this amount of additional retail space is completely unrealistic in today’s retail environment. The evidence base is widely out-of-date given the current trends and impact of on-line shopping. Rather than develop more retail, redevelop unsustainable town centre retail sites into affordable and sustainable housing.</td>
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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment: MM2 - LPMM18/6072</th>
<th><strong>Respondent:</strong> Nicola Fox 20867425</th>
<th><strong>Agent:</strong></th>
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**Attached documents:**
Comment: MM2 - LPMM18/6094  Respondent: Nicola Fox 20867425  Agent:

I therefore demand that the examination of the Local Plan be re-opened so that current factual evidence can be considered to include ONS figures and that a revised retail demand forecast for Guildford Town Centre be commissioned, if not already available.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Attached documents:

Comment: MM3 - LPMM18/6077  Respondent: Nicola Fox 20867425  Agent:

S3. The town centre policy is inadequate and does not address the infrastructure deficit nor the structural changes currently being witnessed across the country in terms of the use of town centres.

Attached documents:

Comment: MM40 - LPMM18/6084  Respondent: Nicola Fox 20867425  Agent:

Site A35. The addition of land to the south of the site does not mitigate the housing density as much of this land is constrained by the VOR beacon.

Attached documents:

Comment: MM41 - LPMM18/6074  Respondent: Nicola Fox 20867425  Agent:

MM41. Transport strategy relies too much on inadequate modelling, including the delay to the M25 J10/RHS scheme. This will impact on proposal in the north of the borough, especially Three Farms Meadow

Too much reliance is put on alterations to the A3 near Guildford, all of which are outside of GBC’s control.

Attached documents:

Comment: MM13 - LPMM18/6085  Respondent: Neal Fox 20867873  Agent:

MM13. The allocation of this amount of additional retail space is completely unrealistic in today’s retail environment. The evidence base is widely out-of-date given the current trends and impact of on-line shopping. Rather than develop more retail, redevelop unsustainable town centre retail sites into affordable and sustainable housing.

Attached documents:
Comment: MM2 - LPMM18/6091  Respondent: Neal Fox 20867873  Agent:

RE: GUILDFORD BOROUGH COUNCIL – LOCAL PLAN CONSULTATION.

I write further to the publication of the revisions to the draft Local Plan. I object to the proposals for the following reasons:

MM2. I still consider that the Housing Target figure is wrong. The hearing on the Local Plan must be re-opened in order that the latest ONS figures and household projections can be taken into account.

MM2. Why should Guildford be required to take Woking’s unmet need especially as by doing so further green belt land will be required?

Attached documents:

Comment: MM2 - LPMM18/6092  Respondent: Neal Fox 20867873  Agent:

I therefore demand that the examination of the Local Plan be re-opened so that current factual evidence can be considered to include ONS figures and that a revised retail demand forecast for Guildford Town Centre be commissioned, if not already available.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Attached documents:

Comment: MM3 - LPMM18/6090  Respondent: Neal Fox 20867873  Agent:

S3. The town centre policy is inadequate and does not address the infrastructure deficit nor the structural changes currently being witnessed across the country in terms of the use of town centres.

Attached documents:

Comment: MM40 - LPMM18/6089  Respondent: Neal Fox 20867873  Agent:

Site A35. The addition of land to the south of the site does not mitigate the housing density as much of this land is constrained by the VOR beacon.

Attached documents:

Comment: MM41 - LPMM18/6086  Respondent: Neal Fox 20867873  Agent:
MM41. Transport strategy relies too much on inadequate modelling, including the delay to the M25 J10/RHS scheme. This will impact on proposal in the north of the borough, especially Three Farms Meadow.

Too much reliance is put on alterations to the A3 near Guildford, all of which are outside of GBC’s control.

Attached documents:

**Comment:** MM39 - LPMM18/6173  **Respondent:** John Kelland 20870817  **Agent:**

I wish to object to this land being removed from the Green Belt. I live at 55 Eashing Lane and enjoy walking in the area, the character of which would be irreversibly damaged by this proposal. Godalming is already heavily developed and needs its remaining green spaces.

Attached documents:

Total records: 5860.