



WEST CLANDON PARISH COUNCIL

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Planning Policy (Local Plan consultation),
Guildford Borough Council
Millmead House
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8th July 2016

Dear Sirs

OBJECTIONS TO 2016 GUILDFORD DRAFT LOCAL PLAN

West Clandon Parish Council welcomes the opportunity to comment on the consultation draft Guildford Local Plan. We have a number of objections to the draft plan.

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

General comments

We have serious, general objections to the plan which are summarized below as well as being expanded upon in our comments on numbered policies in the draft plan.

- In common with many others we do not believe the housing figure has been properly calculated and we believe it overstates housing need. The Council has prevented Councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
- The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- We do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

- Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
- Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.
- The A247 through Clandon is overburdened by traffic already and is unsuitable as an A road in any event. In parts it is too narrow for two lorries to pass and lorries routinely mount the pavement at speed in a dangerous fashion. We believe the plan should include proposals to provide other routes for traffic to take traffic away from the A247.
- We object to the Gosden Hill proposal. We do not believe very exceptional circumstances have been shown to justify taking this site out of the Green Belt. Even if the Gosden Hill development were to remain in the plan we believe the boundary should be explicitly drawn so as to prevent it being visible from West Clandon. In addition development should be conditional on the A3 improvements and new railway station.
- We object to the Garlick's Arch proposal. This site was removed from consideration before the previous draft of the plan was issued. We do not understand how this site has been brought back into the plan. We do not believe exceptional circumstances have been shown to justify taking this site out of the Green Belt. The site was not discussed in the Green Belt and Countryside study and there seems to have been no consideration of the justification for removing it from the Green Belt.

General Comment on Policies

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

Comments on specific policies

POLICY S1 – Presumption in favour of sustainable development

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

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers

to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

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

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

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

POLICY S2 –Borough Wide Strategy

We object to Policy S2 on a number of grounds.

1. The housing number of 13,860 new homes is excessive. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is in any event based on an arbitrary and inappropriate Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate and Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

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

4. The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is

completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. We have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

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

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

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

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

9. This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. We believe the Council is

under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

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

11. The Plan is out of balance in proposing 36% of all new housing in the three wards of Lovelace, Send and Clandon and Horsley. These are currently rural areas whose identities will be greatly and detrimentally changed by these proposals.

POLICY H1 – Homes for all

We object to this policy.

A greater proportion than 60% of Surrey University students should be housed in university accommodation. The university should be encouraged through this Plan and the planning process to increase provision of university accommodation. It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

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

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

POLICY H2 – Affordable homes

We object to this policy on the grounds it should be more firm and explicit on unviability in paragraph 4.2.40.

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

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

POLICY H3 – Rural Exception Homes

We object to this policy for a number of reasons:

1. The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.
2. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.
3. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.
4. The policy wording should define small, either in land size or number of units. We are concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)
5. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular we believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related". Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)
6. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
7. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

We object to this policy as we are concerned it policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. It should be tightened up.

POLICY P2 – Green Belt

We object to this policy.

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
2. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt
3. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of green belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.
4. The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. We believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.
5. As mentioned above we note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and we consider this to be a deliberate untruth which compromises the consultation process. We would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was

delivered to most houses in the Borough.) We reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

6. We object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. We also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

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

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

POLICY E1 - Meeting employment needs

We object to this policy.

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

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

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

POLICY E2 - Location for new employment floorspace

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

POLICY E6 - The leisure and visitor experience

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

POLICY E7 Guildford Town Centre

We object to this policy.

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

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

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

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

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

6 The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers.

POLICY D3 - Historic environment

We object to this policy as it is very weak and we do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will

“enhance” heritage assets which we fear is a developer’s charter as it leaves plenty of room for abuse.

POLICY D4 - Development in urban areas and inset villages

We object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

POLICY I1 - Infrastructure and delivery

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

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

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

POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

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

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

SITES - POLICIES A1 TO A57

Each of these objections relates to each of the sites in the Green Belt.

1. We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. We believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First we believe constraints should have been applied. Secondly we believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green

Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

POLICY A25 - Gosden Hill Farm

We object to Policy A25 with proposals for Gosden Hill Farm.

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

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

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

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

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

POLICY A43 AND A43a – Garlick's Arch

We object to Policy A43 and A43a on Garlick's Arch.

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

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

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

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

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

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

The development will cause harm to the ancient woodland on and by the site. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'John Stone', with a horizontal line drawn underneath it.

John Stone
Clerk

For West Clandon Parish Council