



# WEST CLANDON PARISH COUNCIL

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Subject: Local Plan: strategy and sites 2017 - response  
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Dear Sir/Madam

## **Ref: Guildford Local Plan Strategy and Sites Consultation 2017**

The West Clandon Parish Council **objects** to elements of the 2017 draft of the Local Plan as set out below.

### **Soundness of the Plan – Objection**

The Local Plan is not sound.

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

- 1) The Plan does not consider the implications of Surrey County Council’s business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.
- 2) The Plan does not consider the Waverly B. C. approval for the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3.
- 3) The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of our residents.

### **Policy S1 Presumption in favour of Sustainable Development – Objection**

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

- 1) Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments extend Ripley/Send further into the green belt. Both the latter developments are taking much more land from the green belt than is necessary for the proposed level of development. One of the important specific purposes of the green belt is to prevent urban sprawl.

### **Policy P2 Green Belt - Objection**

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that

exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

- 1) In the introduction to the Policy statement, numerous sites are taken out of the green belt including Gosden Hill, Blackwell Farm, Garlick’s Arch, Burnt Common, the prison and a number of villages. The Plan fails to detail the exceptional circumstances that have been identified for each site that is to be taken from the green belt.
- 2) It appears therefore that the Plan is based on an assumption that because the housing number cannot be accommodated on brownfield or previously developed land in the green belt, it is legitimate to move the boundaries. A blanket change to green belt boundaries is being made to facilitate development. That is not in accord with the NPPF or ministerial statements.

### Policy ID1 Infrastructure – Objections

- 1) Our residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve **existing** congestion and limit **future** problems.
- 2) Much is made of the need for new infrastructure to support developments and for this to be in place as needed (listed in App. C to the Plan). Even if this happens the Plan admits ...”**we forecast that there will also be an absolute increase in overall traffic volumes**”. This will be most acutely felt at junctions but these effects have apparently not been analysed so that we don’t know the location or impact.
- 3) We can be sure however that the **cumulative** effects of the developments in the North East of Guildford will have a devastating impact on the A247 through our village (and of course on Send). It is hard to see how any of the infrastructure proposals in the Plan (App. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is well known that they have no money available.
- 4) The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. People will be living on the sites well before infrastructure is complete.
- 5) If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.
- 6) All of these developments will draw very large amounts of additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to Gosden Hill schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
- SCC’s business plan for Newlands Corner

We point out that although the A247 is classified as an A road, it has none of the characteristics because it:

- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor sight lines
- has a very difficult junction to access the station
- has a dangerous junction with the Southbound A3 on-slip road
- is largely unlit
- has a primary school
- is already very congested at times

In summary, the A247 is quite unsuited to coping with additional traffic and it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which residents strongly objected.. There is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

### **Policy ID2 DOT Road Investment Strategy – Objection**

- 1) There is no detail about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed. Developers are expected to take whatever emerges into consideration in their plans. Will GBC delay approval of developments if Highways England plans run late? Will GBC refuse approval of developments if Highways England plans are inadequate?
- 2) Residents are being asked to approve a policy which is critical for mitigating the cumulative impacts of developments in our area on the basis of “it will be alright on the night”.

### **Policy A25 – Objections**

- 1) Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
- 2) If this development proceeds, the narrow strip of Green Belt remaining between Guildford and Clandon at this point will again be proposed for development by the same developer who is promoting Gosden Hill.
- 3) The development will be highly visible from the A3 when approaching Guildford.
- 4) Together with the developments at Garlick’s Arch and Burnt Common there will be an almost uninterrupted ribbon of development along the A3 extending 5 miles from the centre of Guildford.
- 5) The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is stationary every day during rush hours.
- 6) The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
- 7) The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

### **Policy A43 Garlick’s Arch – Objections**

- 1) The size of the land to be taken out of the green belt seems well in excess of the space needed to build 400 homes. What will be the fate of the excess land?
- 2) Garlick’s Arch (A43) is an unsustainable location. The nearest station is about 1.5 miles away and the bus services are infrequent. Residents will be dependent on cars.
- 3) Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. The development will cause additional traffic on the A3 and the A247 and B2215 in Ripley, Send and West Clandon.

### **Policy 43a Slip Roads – Objections**

The provision of a Northbound on- slip road and a Southbound off- slip road to the A3 to join the A247 are justified in the Plan in order to relieve Ripley from the effects of the development of Wisley.

- 1) It is not clear how this is intended to work. To avoid Ripley, traffic from Wisley wishing to go South either goes up to the A3/M25 roundabout and comes back down the A3 or direct access to the A3 Southbound is provided at Wisley/Ockham(as claimed by the promoters of the Wisley development). In either case, slip roads at the A247 seem unnecessary. It is more likely that these slip roads will be to service the Garlick’s Arch and Burnt Common developments. The slip roads will have the effect of creating an all-ways junction with the A3 at Burnt Common making it a centre for future development and a traffic magnet with clear implications for the A247.
- 2) If a 4-way junction for the A3 is deemed necessary, the logical place for it would be in the vicinity of Potter’s Lane where it could enable Gosden Hill to have a Northbound route avoiding Burpham.

### **Policy A58 Burnt Common – Objections**

- 1) This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
- 2) The Plan calls for a minimum of 7000sq. m (previously in the 2016 Plan a maximum figure) but will take 9.26 hectares out of the green belt. There is no proper justification given for taking the additional land.
- 3) The evidence base does not support this scale of additional industrial space and the justification for placing it in the green belt is not made out. If the quality of some existing industrial provision is not adequate this should cause re-development of it not a large encroachment into the green belt. The 2017 Employment Land Need Assessment shows a demand of 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the green belt.
- 4) The reference to waste management facilities mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and should not be so casually included for this site.
- 5) The proposal for light industry, storage, distribution and waste management activities at Burnt Common will generate large amounts of traffic including heavy vehicles on the A247.

### **Policy A24 Slyfield – Objection**

- 1) The development of 1000+ houses on this site will put a great deal more traffic onto the A3. This will generate more traffic on the A247 from those wishing to go due South.

### **Policy A35 Wisley – Objection**

- 1) The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 will increase dramatically.

### **2016 Local Plan**

West Clandon Parish Council raised numerous objections to the 2016 draft, none of which seem to have been addressed in the 2017 draft. We stand by these previous comments.

Yours faithfully,



John Stone  
Clerk  
For West Clandon Parish Council