

Local Plan
Strategy and Sites
Issues and options
Consultation document

Burrows Cross Area Residents' Association - Draft response

Qu 1

Do you agree with the summary in Appendix B? If not, can you please explain why?

No, I do not agree with the summary in Appendix B. It is not possible to agree with this summary as a whole because it is inherently flawed and contradictory, and is not putting forward one point of view but a number of contradictory views. It would be better to ask respondents to reply to each statement so that you could get a sensible and statistical result. As it is, any result will be pointless because some remarks are incontrovertible, some are reasonable and some are factually contradictory with others. Anyone who says that they agree with the appendix hasn't read it because it is not consistent. It is hard to identify the errors because the points are unnumbered but I shall seek to do so in part.

Geography and population may be accurate.

The statement that there is increasing competition from Greater London is extraordinary. I presume that GBC does not intend to compete with Greater London in terms of the economy? Does GBC think it should? The residents do not. Remove this statement.

It is not possible to argue simultaneously that the current economic success comes at the price of congested roads pressure on infrastructure and high house prices and also that there is a current lack of suitable land for economic development to meet the needs of the business community - you can't have both statements! Land is finite - unless you drain the sea (a point that GBC does not seem to have noticed).

There is a fundamental failure to recognise that Guildford Borough is not a closed system. There is opportunity to work in Greater London and we can get workers from Greater London. Therefore the statement that there is a widening skills mismatch between residents' skills and the needs of employers is extraordinary. Is this suggesting that we should simultaneously build homes to attract new workers and factories to provide new workplaces? This is not the wish of any of the residents of Guildford. As noted in the appendix, 89 per cent. of the borough is designated as Green belt. This is important not only for the residents of the borough but for the metropolitan community that the Green belt serves. As noted, the natural and man made environments limit the opportunities for sustainable development. This is an absolute limit on development and we must recognise this.

I do not agree that we don't have enough affordable homes. Guildford is within easy commuting distance of London and many residents are commuters. Compared to even suburban London Guildford is extremely affordable; it is possible to buy a three bedroom freehold home for the price of a one bedroom leasehold flat in Zones 2-3. As a result, the development pressures are

enormous. This is a simple sum which all homebuyers can do. We do not have to meet all of London's overflow, nor can we do so. As noted, we currently enjoy a high quality of life; it is not the responsibility of GBC to ensure that our quality of life is damaged.

I do not agree that the boundaries of the metropolitan green belt need to be reviewed to plan for sustainable development. This is NOT sustainable. It also conflicts with the requirements of the NPPF. I agree that increasing car use has implications for climate change. On this basis it is ludicrous to say that we have to accept changes to the green belt.

Qu2

Do you think the research listed in appendix C appropriately covers what we need to know to write the new Local Plan? If not, can you please explain why?

No. There are a number of documents referred to which are not available for public consultation, or which were prepared without the basis of proper consultation.

the plans were on display.. in the bottom of a locked filing cabinet stuck in a disused lavatory with a sign on the door saying *Beware of the leopard*. ("The Hitchhiker's Guide to the Galaxy" -Douglas Adams).

1. The consultation process is (intentionally?) inadequate, given the complexity of the process and potential impact on local people. The Local Plan Strategy and Sites (LPSS) document currently subject to consultation is reliant upon Council documents which were themselves not subject to a public consultation process and so themselves are not suitable for purpose, dating back at least four years which run to many volumes and thousands of pages (considerably in excess of the NPPF, which lays stress on simplicity and clarity). Some of these documents are not publicly available. Source documents include the Green Belt and Countryside Study (GBCS) and Strategic Housing Land Availability Assessment (SHLAA), which in turn refer to many other sources. No reasonable effort has been made to explain or communicate the contents of these documents to the public prior to the present consultation, and many of the documents are not available on the consultation website, and indeed can only be identified with the planning department's specific guidance as to location since they are not listed or identified in any public forum or document. Yet Question 2 of the online consultation questionnaire unfairly asks the public to comment on the evidence base. The risk is that an understandable reluctance or inability to answer this question meaningfully will be taken, wrongly, as public consent, but the council should be aware that any such assertion will be subject to potential democratic or indeed legal challenge. It should be noted that a couple of months are not long enough for busy, ordinary residents to address this vast body of material, which has been assembled largely by private-sector consultants without any democratic input. This is part of the hidden developmental agenda which residents are generally seeking to refute. The Green Belt and Countryside study is a flawed document and is not adequate as an evidence base for the local plan. Its scoring and weighting for landscape, which is so important to Guildford, is flawed. Its interpretation of sustainable

development is incorrect and inconsistent with other Evidence base documents.

2. Local policy is much more pro-development than national policy. This will be challenged at the appeal stage if not changed before. The council, and the councillors, have failed in their responsibility here. The NPPF notes as a fundamental dimension (NPPF 7) the requirement for the planning system to fulfil an environmental role “contributing to protecting and enhancing our natural, historic and built environment”. This local plan does not comply with this requirement and so is subject to challenge.

Clause 9.79 of the NPPF notes that “the government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence.”

It further notes, listing the benefits of the Green Belt, which include (NPPF 9.80) “to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land”. None of these factors have been taken into account by GBC and this is a dereliction of its responsibility and will be subject to challenge.

Inter alia, Clause 9.87 of the NPPF notes “as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It should be noted that this extends previous Green Belt policy by implication into the way in which current Green Belt policy can be interpreted, and therefore previous aspects of planning policy guidance are at least as relevant as some of GBC’s source documentation.

Clause 9.88 notes that “when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations. This has not been shown in the draft local plan which has a presumption in favour of green belt reduction and development. In fact the plan should not allocate any development to the green belt until all available urban resources are utilised (NPPF 9.89 and 9.84).

This draft plan has a hidden agenda of permitting aggressive green belt development and ignoring the legal obligation to consider brownfield sites in preference.

3. The ambiguous status of the LPSS invalidates it as a basis for consultation. The document describes itself as a “draft” list of potential options but also implies it is already the decided and settled strategy of the Council. No terms of reference are stated. No authorship is declared, despite frequent use of terms such as “we” and “our” strategy. No evidence is given of whether or not elected Councillors, collectively or individually, have approved the text or made any input (although we understand that the local Councillors approved this draft unanimously). This may simply be shoddy drafting, or it may be intended to conceal the fact that, after many years, the Local Plan process has suddenly slipped from technical evidence-building into policy-making. The LPSS source documents, including the GBCS and SHLAA, strenuously deny that they are policy papers. The SHLAA finalised in December 2012, for instance, insists that it is “*a technical assessment of land, and is not a policy making document. It is therefore not available for consultation*”. In this way, the public have been actively discouraged until now from engaging with the issues. In its present form, the LPSS falls so far short of the standards required by a public consultation document that it should be withdrawn.

4. The LPSS selectively distorts the evidence. A comparison, for instance, between site-specific information given in the SHLAA and LPSS will show that some important constraints on site suitability contained in the former has been edited out of the latter, presumably with a view to maximising the number of potential development areas.

5. The judgements contained in the source documents (GBCS and SHLAA) are defective. Despite employing highly complex methodologies and portraying themselves as objective studies, these documents appear based on an *a priori* decision to talk up the potential for development while glossing over obvious difficulties well known to local residents, such as flood risk, traffic and stress on local services and infrastructure. Similarly, there are a substantial number of factual inaccuracies in the statements made within the plan. Clearly the consultants employed were directed in the approach undertaken, and the employees of the council clearly have a pro-building agenda, but Councillors are under no obligation to agree with their highly slanted conclusions. For instance, some sites are recommended for new housing on highly detailed, technical criteria possibly designed to deter dissent, despite appearing on Environment Agency maps as being located in areas of high flood risk (e.g. the Ripley Lane and Waterloo Farm sites in West Horsley). Such sites should never have been included in the LPSS as options. An assessment of commonsense evidence should precede, not follow, the presentation of strategy options.

6. The GBCS is too incoherent to serve as a reasonable basis for strategy-making. Serious doubt must surround the evidential validity of this document, whose size, shape and stated intention

changed radically over the several years it was compiled. Its four large volumes reflect these twists and turns. Volume 2 identifies the urban areas of Guildford, Ash and Tongham as capable of accommodating 9,800 new dwellings in 16 “Potential Development Areas” (PDAs) over approximately a 20 year period. But in mid-2011 the study was extended to the borough’s villages: Volume 3 produces another 41 Green Belt PDAs said to be able to cope with an additional 4,900 new homes. No reason is adduced for this radical change in policy. Did the Councillors think 9,800 homes insufficient? Since the interim plan was based on an annual supply of 312 homes, this would not seem a logical argument. Did they think new development should be spread more widely? We do not know, because there are no stated numerical targets or public guidelines regarding Green Belt development. The locally explosive step of taking villages out of the Green Belt was therefore set in motion by default, by a document purporting to be merely technical.

Worse still, in moving the goalposts between Volume 2 and Volume 3, the planning playing-field is also tilted decisively against rural communities. As paragraph 4.3 of the online summary of the GBCS states,

“The methodology for assessing the appropriateness of development sites adjoining the villages was altered slightly from that of the main urban areas described under Volume II above. If those land parcels which scored highly against Green Belt purposes (a score of 3 or 4) were eliminated from further assessment (as occurred for the main urban areas) this would have resulted in a number of the villages not being considered for any PDAs. Whilst such an approach could have been taken, it was not considered helpful to the Council’s subsequent assessment of potential allocations. As a result, whilst all of the land parcels adjoining the villages were assessed against Green Belt purposes, the score against such purposes did not prevent the parcels being assessed against environmental capacity, and sustainability criteria”.

Leaving aside the validity or otherwise of the “Green Belt purposes” scores awarded to individual sites (which would repay case-by-case scrutiny), this means that high-scoring sites in urban areas are exempt from consideration as development zones, while village sites are not. This is inequitable, unjustifiable and subject to legal question.

The GBCS also makes it easier in other ways for village sites to be expelled from the Green Belt:

“4.6 The sustainability criteria were very similar to those used for the urban areas, but were altered to exclude those facilities only found at the main urban areas.”

The GBCS summary half owns up to some embarrassment about these double standards:

“6.4 As explained within sections 3 and 4 above, a slightly different methodology was adopted for the identification of PDAs between Volumes II and III. This is not considered to weaken the findings of the Study for the following reasons;

- Direct comparison can be made between recommended urban area PDAs and other recommended urban area PDAs, and between recommended Village PDAs and other recommended Village PDAs across the Borough.*
- The methodologies reflect the scale of development that would be likely to be appropriate in the context of the urban areas or villages, and the different environmental constraints and sustainability parameters that apply.*
- Whilst direct comparison between urban and village PDAs may not be appropriate or required given the different scales and purposes of development typically assumed for the urban and village areas, if comparison is needed, all recommended PDAs have been assessed against largely similar criteria, so data is available within the Study to make such comparison.”*

The language is obscure. How different is “slightly different”? “Not considered” by whom, and why? What development is “likely to be appropriate”? Why may comparisons between urban and rural PDAs “not be appropriate”? How similar are the “largely similar” criteria? Considering the importance of the issue, the explanation given is unconvincing.

Finally, the GBCS was then changed again to align it with the 2012 National Planning Policy Framework. Instead of revisiting its earlier judgements in the light of this important new national requirement, the GBCS merely adds another volume. This retrofits an entirely new set of criteria (“insetting”) to the gradual accretion of justifications for removing sites from the Green Belt. Volume 4 is the origin of the – by any standards extreme and provocative – proposal to expel *two-thirds* (16 out of 24) of Guildford’s villages from the Green Belt, including a number that reside within the AONB. This proposal is shamelessly reproduced on page 52 of the LPSS, showing how mere technical judgements can stealthily become fixed policy regardless of common sense. The truth is that the GBCS is a mess of moving targets and cannot be used as a reliable basis for policy-making.

7. The LPSS uncritically smuggles the SHLAA into policy, even though the latter emphatically describes itself as a mere technical audit. The SHLAA methodology needs checking in detail for consistency with the Practice Guidance and the National Planning Policy Framework. But unlike the LPSS, it does at least explain its own terms of reference and its conclusions are very clear: a maximalist list of potential development options, suggesting that 11,799 new homes could be built

over 15 years, including 2,539 on “deliverable land” available in years 1-5.

Particularly contentious is the SHLAA’s blanket assumption that villages can accommodate new dwellings at a density of 30 per hectare regardless of site. There are sites where high density is appropriate in villages (where cottage style housing may be appropriate as infill) but the site criteria is important. The LPSS, however, simply rebrands these and other projections wholesale as strategy, at a stroke transforming mere options into implicit targets and prejudicing final policy in the direction of maximum development.

The tilt against rural areas already pre-programmed by the GBCS meanwhile translates, in the SHLAA, into a proposal to locate 48% (1,214 units) of proposed new housing in years 1-5 of the Local Plan on “land currently in the Green Belt (outside AONB)” – i.e. villages, rather than the urban areas – and 67% in years 6-10. Transmitted into the LPSS, this looks a glaringly odd and unbalanced strategy.

There are approximately 20 hectares of brownfield site even within the local plan document that – being in urban areas – would be very suitable for dense housing, but that are excluded from consideration because of unstated and unapproved economic criteria.

8. The LPSS is not a strategy because it fails to prioritise. While disingenuously presenting a maximal list of development “options”, the consultation document fails to rank them in any clear priority order. One result is that the cumulative impact of several PDAs in one area remains unaddressed. For instance, it is proposed to increase the number of dwellings in West Horsley by up to 75% (without any provision at all for increasing local facilities or infrastructure), and to build approximately 2175 houses in the Ockham area with no infrastructure in place at present. The idea that villages such as Shere and Gomshall (which attract continual tourism throughout the year, are important for the film industry, and are central to the Surrey Hills AONB, should be excluded from the Green Belt is ridiculous and ludicrous. It is suggested by the local plan that the topography of Shere excludes views across the green belt – this might be of interest to the film makers of Bridget Jones’ Diary and The Holiday (inter alia) who chose the location because of the openness of its views across the valley! This kind of approach is unstrategic, unrealistic and guaranteed to make the whole local plan unworkable..

9. The LPSS is counter-productive, even on its own terms. The Council and most residents want to see a practical, realistic Local Plan that is finalised on time, commands broad public consent and is implemented fully and promptly. This is a requirement in order to comply with the terms of the NPPF. There is widespread opposition to new development and this must be recognised by the

Council as the elected representatives of the community as a whole. By proposing far too much development the LPSS plays into the hands of commercial developers and leads the public to question the probity and honesty of the planning process. It forfeits public goodwill and sours the consultation process from the outset. It is destined to provoke needless political and legal battles with borough residents, defeating its own object and running the risk of producing poor development results in the end. It is up to elected Councillors to provide leadership by withdrawing this paper from consultation immediately and demoting it to a synopsis for public information and reference only. The existing local plan, and existing settlement boundaries, should be reviewed and accepted in order to have a workable local plan in place.

10. A vigorous campaign to canvass public opinion is now being launched. So far, the Local Plan exercise has proceeded for years on bureaucratic auto-pilot with minimal public involvement. But the start of the policy-making phase is a major turning-point where Councillors have a duty to stop and consider radical alternatives to rubber-stamping previous reports. Relying on a creeping attack on the Green Belt and pushing through unsuitable development sites in the teeth of local opposition just will not work.

The local plan must not endanger the Surrey Green Belt which is important not just to all local residents but is of increasing national importance. The metropolitan green belt is a vital resource for all the inhabitants of London, and is increasingly popular with cyclists (following the Olympics) with walkers and with many non-residents. Local councillors must recognise their responsibility to hold the employees of Guildford Borough Council (who are employees with a remit to follow council policy) to account. They must also recognise their responsibility to be held to account in their turn as the elected representatives of the inhabitants of the wards that voted for them, and if they fail in either responsibility then they should rightly be removed from office for failure in their fiduciary duty, either immediately or at the next election.

Qu3

What are your views on a new vision for the Local Plan and the possible objectives?

The local plan for Guildford should build on Guildford's strengths and not destroy the qualities which are unique to Guildford. The historic and scenic town, the closeness of the rural area, its open spaces and attractive villages should all receive strong protection.

This is the requirement that we as residents and taxpayers require from our elected representatives and that we expect them to require from the planners that are employed on our behalf and with our money. Please remember that you work for us and that you have an obligation to meet our needs.

The Surrey Hills Area of Outstanding Natural Beauty (AONB) should be completely protected against any further development, except for existing brownfield sites and then only with extremely careful planning control. It should receive at least the same protection as the 2003 local plan if not more. The Green Belt should be protected. The Planning Minister has written to our Member of Parliament and confirmed that unmet need alone is unlikely to justify housing development in the Green Belt.

A balanced and sustainable local plan is required rather than a local plan which promotes growth and development. It is important to protect Guildford's heritage to hand down to the next generations; we have inherited this from our predecessors and have a responsibility to pass this on.

The green approaches to Guildford are important as the first impression of the town to visitor. The views from the town to the countryside (and vice versa) all need strong protection. The rural character of the countryside near the town needs especially strong protection.

Historic buildings should be strongly protected in the local plan. Ugly or overbulky buildings should be identified for future redevelopment. Any new buildings or estates should be of the best possible design, in keeping with their surroundings. Even outside conservation areas new building should be of good design, enhancing. The green suburbs of Guildford should be recognised in the local plan and protection given where necessary. New houses in such areas should not be over large or over high, spoiling the surroundings or the roofscapes/rooflines seen in views. New developments should be built within the lie of the land, in keeping with Guildford's hilly topography and its roofscape.

Small independent shops should be encouraged.

The High Street should be protected and its vibrancy as one of the most attractive shopping streets in the country must be maintained. This means that new retail development should be strictly limited in size, of the highest design, and carefully integrated into the existing shopping centre. We cannot have an expansion of run of the mill shopping development turning Guildford into a clone of other towns.

More housing should be built within the town, supporting shops and restaurants, rather than an over-expansion of retail development.

The University should provide student accommodation on campus, perhaps by building on the existing extensive flat car parks (with underground car parking part of that development). The University is a respected part of the town, but it must in its turn respect the surrounding countryside and its importance to the people of Guildford. It is now normal for other universities to restrict car ownership on the part of their students and staff. Bristol, for example, does not permit students to bring cars, but provides free bus passes to students. Something similar could be undertaken in Guildford. This would free up university car parking and provide land for halls of residence. This would in turn free up many homes of multiple occupancy which would then be available to families. The Rydes Hill area has many such homes which are, by South Eastern standards, extremely

affordable. This would reduce the requirement for new homes substantially. Any new development should be restricted to the brownfield sites within the town. It is not clear why the planning parameters given to Pegasus stressed the desirability of building on the green belt, but this must be utterly rejected. Even the draft document identifies 20 hectares (approx) of brownfield land which has - for some unclear reason - been reserved for economic development. This is ridiculous. All such land should be available for housing, and there must be a presumption against building on green fields. Clearly developers have a preference for greenfield construction, but their economic preferences should not be allowed to drive planning policy. The people of the Guildford borough have a strong wish to restrict new building to brownfield sites and this is what should be enshrined in the plan.

Qu 4

Which approach to the mix and density of housing do you think is appropriate?

A flexible, common sense approach is needed rather than a one-size fits all approach across the town and borough. Impact on character and setting must be a priority.

Higher density must go with outstanding design, and every development should enhance its surroundings.

It may be appropriate for some areas in an urban context to have for example flats which are 3-4 storeys tall, which provide high density (high design) accommodation, which would by its very nature be more affordable. In an urban context this would not necessarily involve much additional car use. On brownfield sites in village centres it may be appropriate to have small high density clusters of terraced housing (victorian terraces are now highly prized and are relatively dense housing). There are many brownfield sites which would be enhanced by attractive homes, either flats or houses, at relatively high density. Executive homes at low density are likely to have the most land use and be most expensive in the context of use of greenfield land. Since the prospective owners of these homes are not in need of state support, we do not need to subsidise them by providing access to green belt land for these homes. There should be no use of green belt land at all in this context.

The density figures proposed by GBC are very low, and therefore encourage aggressive use of land, which as previously discussed is a finite resource. Low densities lead to more aggressive attacks on the Green Belt and greenfield sites.

In this context, a study by the Greater London Authority in relation to housing densities is revealing.

The study quoted is **Housing Density Study**

Maccreeanor Lavington Architects

Emily Greeves Architects

Graham Harrington Planning Advice

On behalf of the Greater London Authority October 2012

It notes:

7.92. Typical densities achieved with a series of common typologies are shown in Section 8D. These diagrams show in approximate terms, that:

- A three storey block of terraced houses with a 5m frontage and 18m separation distances can achieve up to around **64** u/ha (where none of the houses are converted to flats)
- A four storey block of stacked family maisonettes can achieve up to **67** u/ha
- A three storey block of walk-up apartments can achieve up to around **115** u/ha

- A four and five storey lift access apartment building with a low proportion of single aspect dwellings can achieve up to around 200 u/ha
- A five storey corridor access apartment building with a high proportion of single aspect dwellings can achieve up to around 270 u/ha

On this basis the GBC density proposed of 40 units per hectare for urban land is very low. I think most residents would accept the desirability of avoiding building on the AONB/green belt/green field sites, and would not be unhappy with terraced housing or three storey blocks of housing. There are some locations (not many) in Guildford where four storey housing might not be inappropriate. But even if this is not considered, densities of 64 units per hectare should perhaps be contemplated, or certainly perhaps 50 units per hectare (subject of course to appropriate design criteria) (ie terraced housing or 3 storey apartments, carefully designed). It should also be noted that higher densities will also imply higher sustainability since there will be less need for additional infrastructure for new building; each dwelling will have a lower heating requirement and this will have an impact on its carbon footprint; there will be denser accommodation and if sited close to transport links this will have lower car use as a requirement.

Qu5

Which approach to affordable housing do you think is most appropriate?

The document refers to the affordability ratio and notes that Guildford's affordability ratio is higher than the South East. However, it does not make a comparison to London. As has been noted above, the real comparison is with London, since that is the comparison that most prospective incomers will make. Compared to London, Guildford is extremely affordable, not to say cheap. It is possible to buy a large home here for the cost of a small terraced house in an unattractive inner city outer suburb. IE the comparison is not with Chelsea but with say Merton or Morden (with no disrespect to those areas).

Demand is inherently infinite on this basis.

Potentially anyone who finds London expensive might come here; there is not any inherent restriction on the demand, except for the price, which compared to London is not high. We have therefore to restrict supply if we are to protect the Green belt.

If we don't protect the Green Belt, we will become the equivalent of a scruffy outer suburb, which will not benefit anyone, except those who have made a profit from the process and moved out to somewhere else.

There is a need for some - limited - affordable housing for key workers in the borough. This however, could be provided on a dedicated basis -long term tenancy in a similar way to tied cottages for nurses, firemen, other key council workers, on a long term tenancy basis or ownership with rights to repurchase for the council.

It is not realistic to talk about local people and the need for homes for local people as if we lived in the 19th century. Few of us live where we grew up, and few of us expect our children to live in the next street. We move and will continue to do so. It is not reasonable to plan on the basis that we have settled, localised communities where we all live and work over a pattern of multiple generations; this does not reflect the reality of contemporary life and is not a sane basis for planning.

Qu 6

Would you support an increase in the proportion of affordable housing and the types of developments that are required to contribute towards affordable housing?

No. I don't think the current proportionate percentage of affordable homes is necessarily sensible, but provided it is not used as justification for building on green field sites, it may be sensible to maintain the current level, or alternatively reduce it. I don't think developers need an incentive to develop; the commercial incentive of building in an area such as Guildford is sufficient. However, perhaps the bar should be set lower in relation to brownfield sites to offset the increased cost of remediation work? There is no reason to increase the available land because of other overriding considerations; if that land needs to be earmarked for affordable housing, so be it, but there should be commensurate reduction in the land available for commercial housing development.

There is a need for GBC to clarify its position in relation to the status of affordable housing, which is treated as a sacred cow without proper analysis. In some contexts this is taken to mean housing which is sold at below market rates on the open market at a subsidy, but subsequently becomes part of the general housing stock; in some cases it means housing which is owned by the council as social housing where rent is below market rates.

In many cases, developers undertake to provide affordable housing which is sold at less than the market rate for other new properties on the site, but which is otherwise more highly priced than local properties which are not new.

In the context of the sensitive topic of affordable housing it is important to agree the basis and not to treat this as a sacred cow, where each respondent or recipient of data interprets the term as they feel most appropriate. This term requires definition before this response can properly be agreed.

As in other areas (eg the source material, the terms of reference, the parameters of the detailed studies), this highlights a fundamental inadequacy within the issues and consultation document. The requirements of the existing local plan should be endorsed by the full council as an interim measure, and then this should be subject of proper definition before it can be subjected to public enquiry.

GBC needs to undertake a proper analysis of the needs for rented housing which will remain in the rented sector in perpetuity.

In an area such as Guildford it is not realistic to use public money to subsidise owner occupied housing which will subsequently be sold at a substantial profit for the then owners, especially in the light of existing government subsidy schemes with a major inflationary impact.

In any event, the number of new homes built within the Guildford area should be capped at around the 300 home level (similar to the existing figure) for the foreseeable future. There should be a bias for affordable homes to within the town.

This is not a NIMBY attitude, but a sensible response to the needs of genuinely lower income families. In most villages there are limited bus or train services (in our village the bus runs at peak hours only, once an hour in each direction; a similar service is available by train; it costs at least £2 in

each direction to get to Guildford). That is not affordable for lower income families. Similarly a car journey to Guildford may not be possible for families that cannot afford to run a car. Being able to walk or use cheaper town transport for work, education, leisure and shopping is essential unless families are to be caught in a rural poverty trap. Pious truisms about localism are not realistic in the current world, where remarkably few people expect to live their whole lives in one village and do not expect their children to live in the village too. If there are affordable homes in Guildford, which can permit a sensible mix of building on a brownfield site, then this should be a satisfactory meeting of the need for affordable homes within the borough as a whole.

Qu 7

Which approach to rural exception housing do you think is most appropriate?

The rural exceptions scheme has already historically led to some damage to the AONB and this should be considered in the context of how the rural exception scheme should be treated in the future. The three alternative scenarios indicated within the plan seem to indicate a preference in relation to increasing the amount of land available through the rural exception housing scheme. It should be noted that rural exceptions sites have historically been for households with local connections. However, in the past, this has been taken by GBC to imply anyone on the Guildford housing list, and the local criteria are not implemented tightly.

Rural exception scheme housing is almost the only scheme which has historically permitted development within AONB green belt areas outside settlement boundaries and on greenfield land, so it has been used by developers for small land parcels which have not necessarily been allocated with the precision or care that would be implied by the principles of the Rural Exception Scheme. There is as ever the problem of defining the nature of affordable housing, and whether this means homes that are owner occupied at a subsidised price or made available for tenancy at below market rents.

There are a number of such schemes throughout the borough which actually create a dependency culture, which is not in keeping with government policy. Homes provided in AONB villages, typically with 2-3 bedrooms, are made available to those on benefits, who are thereafter trapped on benefits because they cannot afford to buy or rent anything commercially in the locality. This is not sensible.

It is not realistic to behave as if land is infinite and the land within the AONB will not be damaged by continual accretions of development, no matter how worthy the social cause. And as previously

noted, it is in fact questionable as to whether that social cause is in fact actually worthy or desirable. Those who need affordable housing because they are in genuine poverty, do not need to be isolated in a rural environment where to use public transport will cost £5 return to Guildford or more, nor in many cases can they afford to run a car. Being able to walk or cycle within the town is necessary, so affordable housing should be sited in the town. The rural exception sites policy is a developer's charter which traps the rural poor in a cycle of benefit dependency, benefiting only those rural landowners who have parcels of land that are otherwise unsaleable to developers.

Qu 8

Which approach to meeting travellers' accommodation needs do you think is the most appropriate?

It isn't clear why most of the available options are targeted at the rural environment. It seems most appropriate to provide pitches within towns or villages where sites are suitable, available and viable which should include being acceptable to the local community.

NPPF requires local authorities to take ministerial statements into account in

interpreting the policies within the NPPF. In response to a PQ of 29 August 2013 the Government set out policies designed to encourage greater protection of green belt land:

As outlined in the written statement of 1 July 2013, Official Report, column 24WS, our planning policy on traveller sites states that both temporary and permanent traveller sites are inappropriate development in green belt. In some cases, the green belt is not given sufficient protection in this context. Accordingly the Secretary of State for Communities and Local Government, my right hon. Friend the Member for Brentwood and Ongar (Mr Pickles), will give particular scrutiny to traveller site appeals in green belt, so that he can consider the extent to which this Government's clear policy intentions are being fulfilled.

Qu9

Which approach to meeting the different accommodation needs of our community, including older people, students, low paid workers and young working people do you think is most appropriate?

The university should be encouraged to build more halls of residence on campus which would be better for the students than private commercially rented accommodation. This would have the additional benefit of freeing up large numbers of family homes in the Rydes Hill area of Guildford which are currently HMOs (homes of multiple occupancy), and this would have a corresponding benefit in reducing the number of additional homes required to be built elsewhere. It has been estimated conservatively that 2000 students live in private accommodation, and these students could sensibly be accommodated in relatively dense halls of residence, requiring a small footprint in terms of land use within the university campus. The university has substantial land currently in use as ground level car parks, but underground car parking for those with required parking entitlement could be a component of development on those sites.

Brownfield sites within the town should be used to accommodate small units. Flats or maisonettes as starter homes, or small terraced houses with gardens for family use, could be built which would be attractive, desirable and suitable for families, as well as being relatively more affordable than large executive homes. These would be suitable for lower paid workers, and arrangements could be made for key workers for reduced rate tied tenancy arrangements for a proportion of such dwellings (the affordable housing proportion might be applicable here, subject to the over-riding requirement to define the nature of what affordable housing is within the context of this Local Plan). Sites have been identified by members of the public - see the Guildford Dragon correspondence pages on 14/11/13 or the comments by Sir Paul Beresford (MP for Mole Valley) in relation to developments close to the station. Such sites would be sustainable (close to public transport and the town centre), improve the townscape of Guildford, and would have a general social benefit. Affordable homes should not be sited in remote villages since the commuting costs are high; low paid workers need to be near a place of work.

Older people typically do want to be close to the town or suburbs since they may be in a situation where they are no longer willing or able to drive; in this context, out of town bungalow villages of the kind previously built are not sensible town planning, especially given limited public transport (such as parts of Fairlands, Normandy). Some bungalows may be required in small clusters on larger

developments, but at high density. Bungalows are desirable for these residents because of the need for avoiding stairs for the old. These are desirable more generally because then older residents may have an incentive to leave larger family homes. Gardens are probably needed here, at least for some residents, but they do not need to be large.

Young working people are likely to prefer a vibrant bustling town centre, with shops, cafes and bars, to either a dead town centre with areas of dereliction (saved by GBC for possible future economic development) or alternatively being in a relatively remote rural location with long commuting times.

Qu 10

Are there any other issues that you think we should cover in relation to tourism, arts and cultural development- if so what are they?

I think the impact of tourism on the economy locally is if anything understated in the consultation document, in terms of the economic and social impact. People come to Guildford to shop not only because it has attractive shops but because it is an attractive town, and they feel it is a pleasant place to be; views from the High Street out to open fields are very important. This and other ancillary benefits to employment are not reflected, I suspect, in the statistics about people employed in tourism or the impact on local businesses. The quality of life in Guildford and the ambience of both town and surrounding countryside cannot and should not be underestimated.

There are a huge number of tourists who are not formally involved in spending money but who are deriving significant benefit from Guildford, the AONB and its status within the Green Belt. The functions of the Metropolitan green belt are critical here.

Once an area of land has been defined as green belt, the stated opportunities and benefits include:

- Providing opportunities for access to the open countryside for the urban population
- Providing opportunities for outdoor sport and outdoor recreation near urban areas
- The retention of attractive landscapes and the enhancement of landscapes, near to where people live
- Improvement of damaged and derelict land around towns
- The securing of nature conservation interests
- The retention of land in agricultural, forestry and related uses. (Source: NPPF).

In that context, since providing opportunities for outdoor sport and recreation is one of the essential aims of the green belt, the users of the borough should include all cyclists, ramblers, Sunday walkers etc. and perhaps their views too should be canvassed in relation to the local plan. They too have a stake in the borough, which is somewhat more significant than that of developers who wish to make a profit and leave the properties that they have sold behind, or companies that are headquartered elsewhere. Every weekend through the summer, Duke of Edinburgh parties walk through the footpaths and vilages of the Surrey Hills in a more or less continuous circuit. They may not be paying any money to do so (except for ice creams and camp sites) but they are significant users of this area. The importance of the area nationally for cyclists has been highlighted by the Olympic cycle

route, subsequently made into an annual event by the Mayor of London, and by other cycling events that regularly close our roads. This is an acceptable sacrifice, because after all the green belt is not only land which can be greedily assessed by developers and their associated industries before moving on, it is the essential area for recreation that serves the city, and the country as a whole, and of which its residents are only the custodians.

I think that it is appropriate to promote the borough as a destination for eco tourism; the North Downs AONB, AGLV and associated green belt is an area of extraordinary diversity, with the sequential ridges of the greensand ridge and the chalk downs providing an enormous range of biodiversity. This has been commented on by Ray Mears in the context of programmes covering biodiversity worldwide; the range of different species in a small area here is notable nationally and internationally. This has the benefit of securing nature conservation interests in line with the NPPF. It is in this context not appropriate to promote the borough as a destination for business tourism. There are enough soulless tracts of hotels around Heathrow and Gatwick without adding to them, and without killing the goose that lays the golden eggs. Too much aggressive development will damage tourism and will turn Guildford into a mediocre outer suburb. This would also be in conflict with the principles in the NPPF.

I think it is entirely reasonable to promote the borough as a location for films, but in fact it is NOT appropriate to develop tourist facilities to support this. The villages of Shere and Peaslake are an important film location, notably used recently to film "The Holiday", "Bridget Jones' Diary", and various other film and television dramas. Unthinking "development" will again kill the goose that lays the golden eggs - they come here because it is a superb undamaged location suitable for filming - where, incidentally, views across the valley are vital for long shots. Damage the views and you damage the industry. Please note that this means that the villages in the AONB should not lose any green belt status since this may have an impact on the views.

We think a cultural strategy that helps to define and promote cultural facilities is important, and in this context would lament the fact that GBC is limiting its funding to the Yvonne Arnaud Theatre, which is an important local cultural centre which produces work of national importance. The significant work undertaken with the musical and dramatic activities of Surrey Arts are to be applauded and rewarded. Locally we have a scheme that rivals and mirrors the famous "La Sistema" scheme in Ecuador {check thisXXX} which ensures that the London conservatoires have a significant and positively disproportionate number of Surrey students among the membership of the youth departments. Music is of an extraordinarily high standard in the area. This leads to cultural enrichment and in turn to a better quality of life for all.

I do NOT think that we should direct development of new facilities including hotels towards those areas where there is a lack of provision. This is perhaps an area where the market might safely be left to take care of itself.

Again there seems to be a presumption that tourism involves physical development, and this assumption needs to be challenged. I appreciate that this is a planning document, but actually the tourism in this area needs very little physical development and in fact this is likely to be counterproductive. We must be careful not to damage Guildford's uniqueness or landscape.

In this context, it is perhaps appropriate to quote from EM Forster, who lived for some time in

Abinger Hammer, campaigned for the green fields before Green Belt legislation, and who said: *"If you want to ruin our Surrey fields and woodlands it is easy to do, very easy, and if you want to save them they can be saved. Look into your hearts and look into the past, and remember that all this beauty is a gift which you can never replace, which no money can buy, which no cleverness can refashion. You can make a town, you can make a desert, you can even make a garden; but you can never, never make the country, because it was made by Time".*

Burrows Cross Area Residents' Association - Draft response Qu 11-16

Qu 11

What approaches to meeting the existing and new employment needs of our borough, including supporting the economy of the rural areas, do you think are most appropriate?

Options considered by the study include

- **Support economic growth in rural areas** (NOT Needed)
- **Balance protecting agricultural land and supporting economic growth** (protect agricultural land is more important than supporting economic growth in this area)
- **Encourage tourism related development in the rural areas to support the local economy** (tourism, as noted above, is quite vibrant in the local economy anyway. It doesn't need too much "encouragement" – and that would need defining quite carefully.)

These options all are targeted at some form of "development" or "economic growth" even in the rural areas. Leaving the rural areas alone should be a priority, especially in this area. We are in the Metropolitan Green Belt, sandwiched between Heathrow and Gatwick, and the map of the metropolitan green belt already shows a swathe of developed land cutting right across the green belt from Kingston through West Byfleet and Woking towards Camberley, with most of the land in that belt developed. We must not allow a similar erosion in this area. The NPPF has a policy of supporting the Green Belt. Rural areas should balance protecting agricultural land and providing tourism with minimal or no development. Protecting agricultural land must be a national priority. Other scenic counties, such as Yorkshire or the Gower, strongly resist urbanisation of the countryside, and we must do the same.

Over expansion of the rural areas with additional housing will lead to increased congestion on the rural road network, and this will lead to businesses in rural areas finding sites less attractive. The rural areas in the borough are not suitable for development either for business or substantial amounts of housing.

Over expansion of the rural areas with additional housing will lead to increased congestion on the rural road network, and this will lead to businesses in rural areas finding sites less attractive. The rural areas in the borough are not suitable for development either for business or substantial amounts of housing.

This question, like some others, does not seem particularly precise and is confusing a number of issues. The options given are targeting at the issues of supporting the rural economy (as answered above); but the title of this question and the wording relates to Offices, industrial spaces and our rural economy.

For the avoidance of any doubt, I do not think that the Green Belt is a suitable location for increased industrial space or more offices. Furthermore, as noted in the statistics section in Appendix B, we have relatively low unemployment (4.7%) and higher than average income. It is demonstrable that there is substantial available unused unlit commercial space in the town. The consultation document notes a number of sites e.g. Midleton Industrial estate (1.97 hectares) Lysons Avenue (9.8 hectares)

Enterprise Industrial Estate (0.3 hectares) inter alia which could be suitable for housing but are reserved due to potential loss of commercial space. Studies undertaken by Pegasus appear to have a rural focus in attempting to identify potential development sites, since the public is able to come forward with a number of suggestions for urban brownfield development that do not involve attacking urban open spaces or "garden grabbing".

Guildford is a thriving commercial town with the 2011 Financial Times annual list of Top 500 Global Companies listing five major businesses with a significant presence in the town[112] – the list includes Philips Electronics, Ericsson, Colgate-Palmolive, Allianz and Sanofi. Electronic Arts (formerly Bullfrog Productions), Media Molecule, Lionhead Studios (acquired by Microsoft Game Studios) and also Criterion Games have helped the town become a centre for video game production. (Source: Wikipedia).

The document has an inappropriate emphasis on a requirement for development given that the borough is already well supplied with unused commercial space which is well sited; is subject to serious congestion due to inadequate infrastructure; and that existing businesses are fully utilising the available workforce. There is no real need for either growth or development in this area. This is recognised under EU rules which preclude state aid to areas which are not in need of development. It is not clear why GBC feels that they need a development agenda in a prosperous area, with high quality of life, high employment, substantial congestion. This is particularly so given our importance as London's playground - our green belt is a vital part of the wellbeing of the city. We do not need more development here, and it has not been approved as part of the democratic process by any of the residents. It should not be forced upon us.

Qu 12

Options: to produce a Town Centre SPD (supplementary planning document) following adoption of the Local Plan

NB this is the ONLY option given

Is this the correct approach to guide the future development of the Town Centre?

The consultation document states "it is important that we plan for new shopping development in our centres". It also notes that more detailed guidance will be produced.. once the Local Plan is at an advanced stage.. more detailed guidance can be contained within a future SPD.

In other words, as with the housing numbers, the residents of Guildford are being asked to approve a plan which does not give any guidance as to the planners' intentions for the town centre, other than a desire to increase shopping *development*. Again it is not clear why the imperative need is for more development, in a machismo run mad where GBC wishes to compete with other local centres – and indeed appears to state that it wishes to compete with Greater London (see Appendix B: economy and jobs; Weaknesses point 4 "there is increasing competition from Greater London"). Guildford is prosperous; it is affluent; it has a good quality of life; there is high employment. It is also congested, so increased additional physical development is absolutely not required, nor desired by most residents. Furthermore it is *beautiful*; popularly referred to as "the most beautiful High Street in England". At the entrance to the high street there is a reference to a quotation which states that Guildford is one of the most beautiful towns in England – let us keep it that way.

The consultation document notes that "we currently lack the choice to shop locally at a discount store such as Aldi or Lidl". I am not sure that increased development involving discount stores, with additional discount based retail space, is the vision for Guildford that any residents would choose. This must be rejected.

There is also a concerning statement "we can help to keep more spending within the borough's centres if we expand the primary and secondary shopping frontages". This statement needs clarification. The frontages, especially in the High Street, are of historic interest. We don't want mediaeval or Victorian frontages replaced by a large-scale LIDL.

As a whole, we would submit that a detailed plan for the town centre should be produced before the Local plan is completed. The plans for the town have a direct impact on the countryside in which it sits, and the vision for the town is important in the context of the area as a whole.

The residents of Guildford as a borough want to keep their town beautiful, and they want to preserve their countryside, both for the borough's residents and for all other users, and for the future. They want brownfield development to provide some housing, affordable if possible, within the town, with urban regeneration of the few derelict areas. They don't mind some limited development within the town, provided this doesn't create more congestion. At present this consultation process seems to be imposing substantial quantities of housing and other development pressures on the residents without allowing the a consultation process to be open. This is in conflict with the NPPF process and it conflicts with the NPPF guidelines in relation to the Green Belt.

Qu13

Would you support the proposed approaches to helping support our local centres, district centres and Guildford town centre?

NB Options are

- Retain the current hierarchy of town, district and local centres with the exception of upgrading Ripley from a local to a district centre
- Redefine Guildford's town centre's boundary to that now shown on Figure B

The hierarchy of centres might be acceptable in itself and as it stands.

However, the area of concern in relation to this point is 3.44 which states that "National planning policy allows for small scale main town centre uses in rural areas to take place in locations outside of as well as within their designated centre(s). Small scale is not defined, so we need to set a local threshold for this purpose."

It is not appropriate for any main town centre uses to be undertaken within the Green Belt. This would be in conflict with NPPF guidance 23, 24 and 26. These states that local authorities should concentrate development in town centres; preference should be given to sites that are well connected to the town centre; that there should be an impact assessment on the town centre and on existing committed and planned investment; and if these criteria are not met any development should be refused.

Why is this requirement of NPPF not enshrined in the local plan, and why are GBC so much more aggressive in their implementation of a desire to create development than the NPPF requires?

There should be a preference to locate any new development within the town centre, but this should be subject to the constraints of an impact assessment to determine whether any such new development would in itself be harmful before it is approved, as required by the NPPF.

It has already been noted that the rural parts of Guildford are subject to serious congestion at peak hours. As a result, there is an additional requirement imposed by NPPF which is that all developments which generate significant amounts of movement should be required to provide a travel plan (NPPF 36).

Qu 14

Are there any other options that we can consider to try and help balance development with traffic and congestion?

This question again is fundamentally flawed. It presupposes that the options listed are all acceptable (they are not), and as ever, there is a blurring of issues within several of the options.

Some options that would be acceptable are:

- Focus new development that will generate significant movement in locations where the need to travel will be minimised (yes) and the use of sustainable transport modes can be

maximized, including locations which can be made highly accessible by passenger transport (including by park and ride services and are served by cycle and pedestrian routes (actually probably NO- such transport might be desirable but in practice cars will be used unless new development is very close to the town centre. Therefore this needs to be taken into account in the assessment, it is not realistic to presume that “sustainable” transport options can be used.

- Expect all developments that generate significant amount of movement to provide a long term travel plan, identifying the movements the development will generate and how these would be managed to deliver sustainable transport outcomes (fine, in principle, provided that this is an independent assessment not biased in favour of development)
- Continue to identify and bring forward further park and ride facilities, particularly along the northern and eastern approaches to Guildford Town NO. AONB has already been attacked by a large park and ride facility at Merrow, which is little used. Park and ride facilities are not desirable since they use large amounts of agricultural land, create urbanisation at the periphery of the towns, and are expensive and difficult to use. They are not convenient and they damage the surroundings of the town, leading to further associated peripheral development, as has been the case to the south of Guildford.
- Require new developments to make use of or contribute financially towards improvements to passenger transport services (including park and ride services) and improved access for cyclists and pedestrians. With a particular local focus, cycling along the A25 is impossible except when the A25 is closed to cars for major national or international cycling events. The roads over Newlands Corner, a site of national importance within the AONB and green belt, do not allow expansion. Even a cycle track here would be an eyesore and would be unacceptable. As a result, it is not appropriate to even consider any new developments along the A25 route. However, any new developments throughout the borough should be required to pay in full for any infrastructure improvement required by that development. As noted in the NPPF all developments which generate significant amounts of movement should be required to produce a Travel Plan (NPPF 36). As noted in NPPF 87, “*inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances*”. Also NPPF 89 should be noted “*A local planning authority should regard the construction of new buildings as inappropriate in Green Belt*”.
- Set aside more road space on the main approaches into Guildford town centre to improve routes for pedestrians, cyclists and buses NO, actually this will lead to more congestion. The roads are narrow and the bus lanes are already counterproductive. Make sure there are no potholes on cycle lanes, and that cycle lanes are clearly marked and defined.

The question asked **Are there any other options that we can consider to try and help balance development with traffic and congestion?** Some of the options proposed are in themselves not acceptable as noted above or require modification.

One option that should be considered and which is fundamental is to restrict development because of the traffic and congestion that will be caused. Within the green belt areas of the borough the requirement to have a presumption in favour of development can be set aside (NPPF 80, 84, 88).

This would be popular with borough residents as well as other Green Belt users. The requirements of potential possible developers imposing congestion, pollution and addition infrastructure cost on taxpayers need to be balanced with the requirements of the taxpayers and residents within the borough who are the electorate voting for the local councilors and who pay the salaries of Local Council staff.

Qu 15 Which approaches to addressing access and transport issues do you think are most appropriate?

Limiting development in the green belt to brownfield sites within existing settlement areas only would be a good start. This would mean that there would be limited impact on the country lanes around Guildford which are already congested and do not meet the needs of the users.

Infrastructure subsidy alone will not create public transport, because there are running costs to both train and bus services which will not be subsidised by developers, and will become a burden on local taxpayers, which is not acceptable. As a result, any development in the rural areas is of its nature unsustainable and will cause additional congestion.

Where public subsidy is involved, buses and trains should run more frequently and until later from the peripheral areas into central Guildford, but this will only limit the existing levels of congestion and will not allow for any increased developmental pressure.

As a result, I would suggest that any development can only be sustainably sited in the town, or in the few limited brownfield sites within existing village settlements, which should be reserved for local affordable housing.

The existing bus station interchange is suitably sited in the centre of town. However, it would be possible to create some measure of development over this site (as has been done at Victoria bus station) offering office accommodation or desirable (but affordable) town centre flats.

A free bus route which links station, existing park and ride sites including the Spectrum car park, shops and town facilities would be an asset.

Qu 16 Are there any other options available to the Council for addressing infrastructure issues?

The consultation document states “We will prepare an infrastructure delivery plan to accompany our new Local plan”. As noted in relation to the failure to plan for the town, this is a fundamental part of the process and should have been addressed in tandem with the rest of the plan. This consultation document is an aggressive attack on the Green Belt which has made extremely specific proposals for areas of land and for settlement boundaries without considering the infrastructure obligations that are associated with this planning process.

NPPF 43 includes an obligation on local authorities to consider advance high quality telecommunications as part of the infrastructure, which is an issue that the document appears not to address. This should be considered as part of the process. It is important that options for the AONB should include for example cabled telecommunications which are buried underground rather than too many masts. This is practicable as well as aesthetically desirable; the AONB area of the North Downs is high and subject to high winds especially through the winter months. Masts and telephone wires are damaged regularly and so burial of cabling is appropriate, practical and sustainable, as well as improving the environment. This is about the only acceptable form of development.

Surrey University has a niche or USP which – inter alia – makes it a significant area of specialism in the computer gaming sector and in the creation of special effects for the film industry. This is an important sector nationally and should be encouraged. However, this is not a sector that is land intensive and in fact IT is a sector where historically very significant businesses have been launched from garages and back bedrooms (cf Apple Computers, Microsoft). Additional land is not necessary for this to be an important local industry, which should be encouraged and supported. However, I think the residents of the borough as a whole would be more supportive of a high tech computer gaming business – likely to need small or minimal space – than additional facilities such as Aldi or Lidl as proposed by the consultation document. For this sector, the single most important aspect of infrastructure is high speed broadband throughout the borough (cabled through the AONB, as noted) as proposed in paragraph 5.9, which I would warmly endorse. Such infrastructure will make economic development and significant economic growth possible without any requirement for additional buildings or indeed additional housing developments. Since Growth appears to be a target that is required by GBC (although not by the residents), it will be met by this requirement with very limited additional physical building.

Clearly water supply and sewage provision need to keep pace with any planned physical development, which is particularly important for areas of new homes. Flood plain protection may also be important. On this basis it is important to recognize that the available infrastructure within

the villages of the green belt is wholly inadequate. A significant proportion of the more rural areas in the Green Belt and AONB do not have mains drainage, and water supplies are limited especially in summer months. Flooding of roads and from backed up drainage systems is not uncommon. On that basis, the fundamental infrastructure of any building within the AONB and green belt would need to be included as part of the assessment of any building project.

Under NPPF 95 an obligation is placed on local authorities to plan for new development in locations and ways which minimize greenhouse gas emissions. Planning to concrete over large areas of the green belt is directly in contravention of this obligation. Building new settlements in areas which will stimulate car use will promote increased greenhouse gas emissions. Even if there is a train line or bus route, which is not the case for significant parts of the borough, there are timetabling issues which mean that trains often run only during peak hours, and buses can be limited in the AONB to two buses per day, with a peak hour service of one per hour. This is not practicable for most people and so car ownership and use is forced upon residents of the borough. It is not realistic to state that train services will become more frequent since that is subject to commercial constraints outside the control of GBC.

The consultation document refers to infrastructure baseline research but does not highlight the areas of existing pressure.

For the avoidance of doubt, the drainage systems in Shere and Gomshall cannot cope with any additional hard standing since there are regularly areas of flooding in times of high rainfall, which are along all the roads. The topography of the Tillingbourne valley is such that water flows down from the hills to north and south into the Tillingbourne and at times along the A25 which runs next to it, certainly in Gomshall, and which accordingly floods, creating an obstruction. Short of flattening the Downs in an AONB, it is hard to see what any developer proposes to do about the capacity of the Tillingbourne to take excess water. Sewage has been known to back up in the drainage system in the adjacent village of Peaslake, and in some parts of Gomshall. These areas have inadequate infrastructure to meet *existing* housing, which has been noted in the context of the recent developments and the developments that have currently been approved and that ongoing in Gomshall.

Electricity supplies in winter are erratic since power lines are blown down (impact of the North Downs, which are hilly and subjected to high winds). We have lived here for 16 years and never experienced a winter without multiple power failures, some of which have lasted a week.

Telephone cabling is similarly subject to poor weather conditions especially in winter, due to high winds, and is liable to fail.

On this basis, the infrastructure in this area is wholly unsuited to any further development.

Infrastructure can be most sustainably provided in the town, on brownfield sites. Suitable sites could be identified; a few have even been identified in the plan but excluded for potential future commercial use. Given that the town is currently oversupplied with commercial property, these sites should be freed up for housing development under NPPF 22.

The purpose of the planning system is to contribute to the achievement of sustainable development under NPPF 6. Only development which is sustainable can be contemplated in the AONB, and effectively the capacity of the infrastructure creates an absolute constraint in this area.

Qu 17

Which approaches to the Green Belt, countryside and green open space do you think are most appropriate?

The consultation document gives the following options:

- **Ensure that all development proposals identify positive measures to protect and improve biodiversity** NO This is a figleaf to pretend that development is acceptable in an area where there is already significant biodiversity. As previously noted, the Surrey Hills AONB is an area where there is extraordinary existing biodiversity. Development proposals in this area must be minimized and restricted to brownfield sites within existing settlement areas. Of course any such proposals should recognize this significance, and protection for native ecosystems with established biodiversity, along with landscape, must be of overriding importance. It is hard to see that any development could be justified in this area.
- **Enhance the value and biodiversity of waterways.** NO I would suggest that care is needed here! We don't necessarily want waterways infected with new biomaterial that can constitute a hazard; this has been a route to ensuring that non-native invasive species, both plant and animal, have caused serious damage to native ecosystems and plants. We don't want a mantra about enhancement – we want protection for the environment that currently exists. NB non-native species include mink, varieties of crayfish, water hyacinth, Japanese knotweed. Biodiversity alone is not desirable; it is the established ecosystem with a pattern of environmental stability within a landscape that is essential.
- **Expect new development to provide additional open space or to improve existing spaces, or an equivalent financial contribution to include provision for ongoing maintenance** NO. Again this is just not good enough. I think it is necessary for the planning department and associated councilors to understand the particular characteristics of the area in which they live. First, as noted in Appendix B, 37 per cent. of the borough lies within the Surrey Hills AONB, 44 per cent. of the area is Area of Great Landscape Value, and 89 per cent. of the borough is already designated as green belt. Where is this “additional” open space to come from? The only existing spaces in the borough that actually require *improvement* are the brownfield sites inside central Guildford. We do not live in an area where there are significant areas requiring improvement. Many urban brownfield sites have been specifically excluded from consideration under the plan by GBC which is in contravention of NPPF 22. In preference, and again in contravention of NPPF 22, those sites are reserved indefinitely even though they are not currently suitable for commercial use, and in preference the consultation proposes to attack open space, green belt and AONB, all of which must be protected. A financial contribution cannot begin to compensate the current residents, the other users or the future users through many generations of land that is infinitely precious.
- **Expect new development to contribute to the borough's network of green open spaces and links between these** NO. There is already a wonderful network of green open spaces and links between these. Any development in the open spaces would by definition obstruct rather than contribute to it. The open spaces, including those that do not have green belt or AONB protection, must have strong protection in the new Local Plan. These areas are of enormous importance to all residents in the borough. This includes village greens, patches of woodland, open fields and hedgerows outside the AONB and green belt. The area is beautiful, and most development is only likely to detract from this. It is noted in the NPPF that (NPPF 79) “the fundamental aim of Green Belt policy is to keep land permanently open; the essential characteristics of Green Belt are their openness and their permanence”. It should be noted that the consequences for sustainable development of channeling building inside the Green Belt, even in areas inset within it, are almost certainly negative, both in terms of sustainability, environmental security, and the fundamental functions of the Green Belt.
- **Take a flexible approach to the loss of open space that is assessed as poor quality, where there is a surplus of open space** NO. The assessment that has been conducted within the Green Belt and Countryside study is very deeply flawed and inconsistent. This has been discussed in the BCARA response to Question 2 at some length and the response to that section is incorporated here by reference. The scoring system is identified as inconsistent in that there is a built in bias in the study with reference to preferring to build on greenfield sites as opposed to on brownfield sites. (see response to Qu2).

This is not the preference of *any* residents within the borough, even those who might be willing to concede greenfield land. The views of those residents are required to be taken into account under the parameters of NPPF (NPPF 1). "It provides a framework where local people and their *accountable* councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities." The residents of Guildford do not want to take a "flexible" approach to the loss of any open space, especially not green belt and emphatically not AONB. As previously noted the assessment system is flawed, and the priority given to the agricultural value of land is not the only, nor should it be the over-riding criterion. Land cannot be assessed only in terms of the quality of soil for farming purposes; in this area, landscape and appearance is of enormous significance.

However, the agricultural benefit should not be disregarded either; in a period of climate change, where the "breadbaskets" of the world are frequently threatened by extreme weather conditions, food acres in the temperate zones such as the UK are of increasing and vital importance, and food security is important nationally in a country with an increasing population and with relatively little food produced at home.

Green field sites outside the green belt in this area are adjacent or contiguous with the Green Belt and so should be presumed as not suitable for development unless they are a) poor quality agricultural land b) of poor landscape value c) adjacent to existing settlements d) small scale. The open spaces near London are of enormous importance for air quality, public health and recreation, and even those which are technically outside the green belt are of some significance because of the extent of the degradation of the greenbelt elsewhere. I will try to attach a map to this submission, but if this is not feasible can provide it on request, showing the erosion of the greenbelt. (can be copied to any interested parties). To the west of the London metropolitan green belt there is an area which runs through Kingston, West Byfleet, Woking, Knaphill, towards Camberley. In this swathe, the green belt has been so eroded as to constitute no barrier to urban sprawl at all.

Without robust defence, this is the implication for this draft plan too. It cannot be allowed to stand.

The economic arguments for "development", as if building over the countryside is the only possible criterion for economic prosperity, are frankly ridiculous. Tourism generates significant wealth for the region already, as does agriculture. It is not sensible to wreck two industries which co-exist profitably and sustainably in a beautiful region, which is also, in the words of NPPF, "to the benefit of body and soul" - just in order to provide slightly cheaper factory space or dormitory accommodation in an ever-increasing Edge City.

Furthermore, it is incomprehensible that "protecting the countryside against encroachment" is given a zero score on the assessment system IF the land is previously undeveloped. This is extraordinary, and ridiculous.

- [Require developers of large developments to provide their own Suitable Alternative Natural Green Space \(SANG\)](#). THIS IS NOT FEASIBLE. Open space, green belt, and areas of outstanding natural beauty may be measured in acres, but they are not just so many acres to be picked up and moved around at the behest of short term economic whim. Land when developed is no longer countryside and the benefits of that land, where it is, are lost for ever. The Green Belt must be protected for everyone. It is for the many, not the few. Only those who live in new homes get the benefit of housing development. But the green spaces that have been set aside for most of the last century, and that have been precious open spaces in an agricultural landscape for a thousand years, cannot be substituted for another space as if neither mattered. The attention to detail that will be given to this is demonstrated by the attention to detail within this plan; where there is a plethora of minor errors, logical inconsistencies, and statements that are simply wrong, intentionally or otherwise. In the event that any development does encroach on open space, or the plan permits this, then there should be equivalent SANG; but such encroachment must be limited. There is a shortage of suitable alternative sites. Furthermore, it is not acceptable to suggest that – for example – farmland that is already open and beautiful might be a suitable substitute for other land. It is imperative that it is appreciated that this is not a simple economic equivalence.
- [Continue to work to deliver the expanded and new SANG sites set out in the Council's](#)

- [Thames Basin Heaths SPA strategy](#) see comment above
- [Identify further SANG in suitable locations](#). See comment above. Why is it even in contemplation that there will such a substantive requirement for SANG, when the Green belt and the AONB have existing and ongoing protection? The NPPF explicitly has as a core planning principle that the green belts around towns are to be protected. The AONB has the planning status of a National Park. If a development takes up land and encroaches on existing open space, it cannot create more open space without demolition of an existing building, and that would not be of equivalent environmental value, by definition.

The Surrey Hills Area of Outstanding Natural Beauty has national park equivalent status. There should be no development in this area other than limited brownfield sites in existing settlement boundaries.

The settlement boundaries should remain unchanged in the greenbelt, and certainly should not be extended beyond the existing settlement. That is as required by the requirements of the NPPF for review. It should be noted that under NPPF 89 inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances (defined by the NPPF). No such circumstances exist in most cases as proposed, and it is certainly inappropriate to take land that is in the Green Belt, or in the AONB, that is agricultural land, and outside the existing settlement boundary and redefine it as suitable for building. This is not the wish of local residents, which is an over-riding and guiding principle for such review as established by the NPPF (see further reply to qu 41, incorporated by reference).

The important requirement to protect biodiversity as established by the NPPF is in the context of ecological systems (NPPF 109) not in isolation. It requires intelligent and sensitive planning in the sense in which it has been managed in the past in this area, not a scattergun imposition. NPPF 109 stresses the importance of ecosystems and notes the commitment to halt the overall decline in biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures. This does not mean building on areas of existing ecological network, nor on wrecking existing ecosystems.

Qu 18. Which approaches to the built environment do you think are most appropriate?

The options listed in the consultation document are:

- [Identify locations in the borough which have strong local distinctiveness and require new developments to conform to that local style, \[yes\] while allowing more innovative design in all other areas](#) [Sometimes. Innovative design is usually more suited to town areas, but less suitable for suburbs or villages. The planning process should note the suitability of particular styles for localities and ensure that the characteristics of an area are not damaged by insensitive or aggressive design. Protection of views in Guildford's hilly topography should be considered. The tower blocks visible across the river on the opposing hill from the mediaeval High Street and opposite the Castle are an example of historically insensitive planning. Care needs to be taken to ensure that a historical context is always considered.]
- [Identify opportunities to improve connections within and beyond the town centre, including links to the River Wey, the university of Surrey and railway station](#) Potentially yes. Maybe no. But it isn't clear if we are talking about pedestrianised open spaces, bus routes or new roads. Hard to give a reply to an unclear question. Please define [connections](#) here.
- [Plan for improvements \[what is an *improvement*, and who decides?\] to existing and provision of new, well-designed public spaces in Guildford town centre, \[yes, the new landscaping around G-live is v attractive, well done!\] \[Ash and Tongham\]\(#\) \[no view, but I'm sure the residents there do have a view\] \[in our villages\]\(#\) \[leave the villages alone, please. We don't want civic improvements with a great deal of implied urbanization; just proper planning constraints to stop inappropriate building, and PROTECTION of our existing open spaces\] \[and other strategic growth schemes as part of any major new development\]\(#\) \[OUCH. We don't](#)

want major new development in the villages at all, and we don't want strategic growth schemes outside Guildford town centre. As previously noted, we think the villages – especially within the Surrey Hills AONB – need protection, not planning changes to make them look like Milton Keynes.

Good design is important in both townscapes and villages, and the planning process is useful and necessary to make sure that design is of a high quality and in keeping with the locality, in view of architectural heritage and historical context.

NB I have requested information from the Parish Council as to whether there is a Parish Plan in place which has information in relation to vernacular architecture. This would be useful, since it can become a requirement associated with planning, which may be a deterrent re housing estate type building on the adjacent fields and help to ensure consistent village views. This isn't an area in which I have any expertise – (yet one more)- so input here could be v helpful. The following is a v tentative draft but will happily defer to anyone with any more expert knowledge here!!

Vernacular architecture in the locality of the parish of Shere, covering the villages of Shere, Gomshall, Peaslake, Holmbury St Mary and Farley Green, includes some of the following features, which should be considered important in terms of planning

- Sandstone walls with inset garretting (small black stones inset in mortar) are a distinctive local feature for boundary walls and some buildings
- Houses tend to be either brick, often with a tile-hung first floor, or of local stone. There are a number of rendered homes within the villages; all villages also have some woodframed “white and black” style cottages and larger houses. Variety within the village structure is important since there is not a homogeneous village “style” and there are limited numbers of houses that are similar to their neighbours, although there are some small attractive terraced sections of housing, especially Victorian or older small cottages.
- Windows vary between casements and sash windows, but traditional styles of both are frequent.
- There are some Lutyens houses in the villages, and others based on the style, which use Arts&Crafts type features, including metal window and door furniture, often of bronze.
- Substantial wooden front doors are a common feature; the older homes tend to have large oak doors, few homes have “modern” front doors
- Very few homes in the area are of aggressive modernist construction, and this would not be in keeping with the AONB.

Qu 19 Climate change and sustainability.

Which approaches to dealing with climate change and sustainability do you think are most appropriate and have we missed anything out?

This is another area where the focus is “big planning” and actually there seems to be a mismatch with the area which is actually under consideration and a lack of understanding of this area which is worrying in the planning department, and slightly surprising. Options discussed are:

- [Require consequential improvements to existing buildings when applicants apply for planning permission unless the improvements are not viable](#) Appendix B notes 1080 statutory listed buildings and 310 locally listed buildings, plus a number of other facts re conservation areas, ancient monuments etc. As noted in the previous question, there are significant areas, both within the villages and the older part of Guildford, where vernacular architecture is extremely important to the townscape. As before, there is an emphasis on “improvements” to existing buildings. Some buildings are not suitable eg for double glazing; single brick buildings cannot be insulated (and there are environmental questions about the efficacy of cavity insulation). This needs to be treated with sensitivity so that building standards imposed locally do not destroy the character of historic areas with negligible environmental impact. Conversely, if there are things which can improve with negligible architectural impact, then these should be encouraged, but with a sensitivity to the architecture and the local built environment.
- [Develop a renewable energy strategy that identifies suitable sites for renewable energy and promotes the development of CHP networks](#) This is not an area where large CHP networks

are likely to be desirable, except on a domestic scale. Domestic systems, as that being trialled by Flow Energy, may well be suitable for encouragement. However, there are other forms of renewable energy which may be suitable, such as the use of methane from Albury landfill site or the Wey waterpower system which have been trialled successfully.

- [Introduce a more stringent standard where viable for water use in new homes, requiring water saving measures and a per person consumption target lower than 105 litres per day](#) NOT realistic. Different home users have different needs. This is a one-size fits all structure which is not sensible. Old or infirm residents may need deep baths rather than showers, deep enough to deal with bathing mechanisms; the incontinent need more use of washing machines. Families with babies need high water use. Families where both parents go out to work and children are at nurseries will have low water use. This is not sensible or acceptable.

There are a large number of other issues that need to be taken into consideration. The draft text notes that buildings are responsible for 42 per cent. of the carbon emissions in Surrey. Some small scale – but not prescriptive – encouragement of suitable changes to existing buildings is likely to be acceptable. New homes will obviously still emit carbon during the construction phase, and are unlikely to be genuinely zero carbon emitters. New homes with solar panels are a good idea; it is also sensible that all new building is constructed with thermally efficient double glazing and high insulation, which may be implied by the CSH rating.

The comment that “[we could plan for buildings that have a longer useful life](#)” is one of the remarks that makes the reader wonder if the planners have visited the locality at all or are reproducing some other region’s planning consultation at least in part. Most of the villages have homes which are at least a hundred years old, many are many hundreds of years old. The centre of Shere, which the planners propose to remove from the Green Belt, is unchanged in street plan since the Domesday book, with a Norman church. Gomshall (similarly proposed for removal from the Green Belt, also basically on the Domesday book ground plan) has the King John House (Tudor) and the Mill (17th century on the site of the Domesday mill), which are both venerable. Both villages have a number of old smaller houses. Has anyone actually visited the villages in question?

The impact of climate change is discussed here but the impact on villages built on mediaeval foundations next to a river prone to flooding of additional building in the vicinity does not seem to have been considered. It is not clear whether the council’s research has identified that these villages are both at risk of flooding, but residents can provide plenty of evidence if required. Similarly as previously noted the water supply issue is relevant to possible extension of settlement boundaries. Neither village should lose its green belt status.

Use of wastewater and grey water should be encouraged, and there should be grants for conversion.

GBC – and, particularly, the residents of Guildford - should be congratulated on the high levels of recycling achieved. It should be noted that it is the residents not the council that cooperate with requirements. A site waste management plan is a detail; it is compliance and civic responsibility which should be recognized and applauded.

Air conditioning is one of the fastest growing users of energy and is not really necessary if buildings are properly designed.

There is a fundamental and enormous gap in the notes on sustainability and the impact on climate change. Encouraging additional car use by building disparate houses across the borough, rather than in concentrated areas where there is already the town infrastructure and the prospect of walking, is to increase the CO2 emissions significantly. It will also increase congestion (more CO2) – and more particulates, NOX and PAHs. Guildford could encourage the use of electric vehicles with a lower CO2 impact which would also generate lower particulate levels.

In fact Surrey County Council awarded significant funds to a company called Surrey Connects Limited for the promotion of electric vehicles, as is a matter of public record. However that company now exists only to promote general development, according to its corporate website. Perhaps the funds

should be re-diverted for their original use, to promote for example charging points in public car parks. This would be more appropriate than general promotion of development which has huge negative impacts.

New buildings are significant in terms of the climate impact of construction, which is the point during which most energy is used. Building new physical infrastructure (roads, sewers, other utilities) to develop new areas is even more damaging in terms of the environment and climate change. In many cases the impact of renovating brownfield sites is markedly less damaging.

Qu 20

Do you support using the Settlement hierarchy to help us decide where new development should go or is there other research that we should rely on?

The consultation document lists the various settlements in the borough, analysed into Urban area, Semi-urban village, Large village, Medium Village, Small village (including Shere, Gomshall and Peaslake) and Hamlet (incl Holmbury St Mary and Farley Green).

The options given are

- Use the settlement hierarchy to judge the appropriateness of developments SEE NOTE. NO
- Use other research to judge the appropriateness of developments YES BUT SEE NOTE; your research is inadequate.

It has been noted by others that the special character of each place needs assessment, and a list of settlements cannot be utilized as the basis of determining where development should go.

Guildford and the urban areas of Ash and Tongham are listed as the principal settlements, and broadly I would agree that most development should be located in those settlements, so thus far I would agree with the first option, provided that the developments are themselves carefully assessed.

However, thereafter, the character of the villages, and the importance of the countryside around it (assessed not by the GBC study but for example by Natural England in the classification of the AONB) is a better basis. NPPF 24 endorses a focus on the town centre for development; it does not necessarily imply imposition of development on green belt villages.

There is, as elsewhere in this document, a degree of muddle and obfuscation. It is not altogether clear whether this is intentional or accidental, but neither are acceptable.

“*Research*” that should be relied on in determining where development should be sited should not just be that commissioned by GBC.

As has been noted elsewhere in this document (incl in qu 1 and 2) the research already conducted is poorly assembled and has not in itself been subject to a public consultation process, but has been incorporated by reference. The process is not robust, equitable or fair. Consultation documents are, in conflict with both the principles and precepts of the NPPF, not available for public appraisal or analysis. Pegasus, appointed to conduct the Green Belt and Countryside Study, are a developers' consultancy, who have as an aim on their website (as of 17/11/13): *Pegasus's mission is to provide expert, accurate and effective advice to steer our clients projects through the planning system and achieve optimal outcomes.* They list among their clients: Richborough Estates, AGM Holdings, Woodstock Homes, Cirencester Opportunity Group, Hive Energy Ltd., Charles Church Homes, Persimmon, Wilson Bowden, Miller Homes, Gallagher Estates, Persmimmon. They do not seem to

have other local authority clients, and their agenda is developmental. This is not an impartial basis for conducting research. This is a deliberate distortion of the planning process. Any research conducted for assessing develop must be on a demonstrably impartial basis with due regard given to the Green Belt. One comment is relevant in this context:

On 11th July 2013, the Secretary of State, Eric Pickles MP said, in the course of a speech to the Royal Town Planning Institute,

You can plan for growth but not at any price. So we have been very clear that we must have secure safeguards to protect the green belt. That vital green lung which prevents urban sprawl.

Sometimes I feel politicians in particular forget that it is there, not simply for the beautiful landscapes, but to keep conurbations from running into each other. To protect the nature of what we call home.

Independent research should be taken into account. Classifications such as SSSI, ancient monuments, AONB, greenbelt, agricultural land quality, conservation areas, listed buildings etc are all independent and widely accepted standards that should be taken into account in the assessment of any area. This, plus the assessments of independent bodies such as the National Trust, the Surrey Wildlife Trust, Natural England, the Surrey Hills AONB and others should be considered before GBC's own research where the parameters are not the subject of public consultation.

Qu 21 Do you support using the Green Belt and Countryside Study to help us decide whether we should identify new settlement boundaries for our villages?

Option: Villages in the Green Belt

Use the recommendations set out in Volume 4 of the GBCS to identify new settlement boundaries for some villages [and – note this is a separate point] to remove them from the Green Belt.

NB This is 3 questions disguised as one.

The answer is NO, NO and NO.

1. No - The GBC Green Belt and Countryside Study is deeply flawed so it is not suitable for determining new settlement boundaries
2. No - I do not consider that it is appropriate to determine new settlement boundaries for our villages [especially not Gomshall and Shere]
3. No – I do not consider that it is appropriate to remove any villages from the Green Belt, but especially do not consider that this is appropriate for Gomshall and Shere (whether using the [flawed] criteria set out in Volume 4 of the GBCS or any other criteria)

Point 7.6 notes **National planning policy on villages in the Green Belt has recently changed.**

[yes, to some degree, but NPPF also notes that there is a consistency with historic policies in relation to the Green Belt].

It continues **We cannot automatically decide to keep all of our villages within the Green Belt.** NO.

There is a *opportunity* to review boundaries at the local plan stage, per NPPF to review this, but no *requirement to determine* a particular outcome. This is very disingenuous. The consultation document implies that this it is a legal requirement to remove villages from the Green Belt, which of course is not the case, but is designed to deceive members of the public in their response. This in terms might mean that the legitimacy of this question is actually subject to uncertainty.

NPPF actually states (NPPF83: *“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period”*). (BCARA emphasis). This process is supposedly consideration only, but the recommendations of GBC in relation to the proposed changes of the settlement boundaries of the villages and (separate issue) the proposed inseting of the villages are inappropriate and should be immediately rejected.

The consensus from all parties is that Shere and Gomshall are important villages which ought to stay in the Green Belt (inter alia see AONB, CPRE and NT submissions to this consultation). There are aspects of NPPF 109-141 which should be taken into account.

In terms of the appraisal of the villages by Pegasus, NPPF 86 is relevant here, and should be included in full. *If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies and the village should be excluded from the Green Belt.*

The legitimacy of this consideration has not yet been legally tested, and may in due course be subject to adjustment, especially given the conflict with the overriding considerations that are imposed by AONB status (equivalent status, on a statutory basis, with a National Park).

However, in the first instance, the question of openness in relation to the two villages of Shere and Gomshall should be considered.

Green Belt openness and open character of the villages

Under government planning guidelines, for some time the most important attribute of Green Belt has been its openness. Any **built** development, however well designed or for whatever desirable social end, cannot fail to diminish this feature. This was the case under PPG 2 and has been tested in case law.

There is no indication that **trees** are actually a restriction to the openness of a village, nor has this yet been tested in case law as far as I am aware. However, the assertion that trees are actually a barrier in the context of rural space is self-evidently ludicrous. Individual trees, hedgerows and woods constitute a significant and much-loved aspect of the rural environment. Surrey is one of the most densely wooded counties in England (giving rise to a thriving charcoal and wood burning industry, and permitting GBC to minimise its fossil fuel usage by using woodburning heating in council offices). Are GBC *really* suggesting that trees do not belong in the countryside? Are they really suggesting that we should cut them all down in order to make sure we stay in the Green Belt?

It has been suggested in the Pegasus study re Shere that tree barriers constitute a disruption to the visual connections to the wider Green Belt *“due to the level of treecover surrounding the village”*. (!) The authors of the Pegasus report do not seem to be aware that the deciduous trees which surround Shere lose their leaves in winter, so I am pleased to inform them of this fact. Bare branches do not in any sense constitute a visual obstruction. Views of Shere from and to the surrounding countryside are a Christmas card staple.

Pegasus have stated re Shere that *views from the wider Green Belt are generally restricted by treecover and topography surrounding the village*. Another fact which appears to have escaped the authors of the Pegasus report is that the Tillingbourne valley, set in the Surrey **Hills** AONB, has *hills*. While, if you stand behind a tree, it may constitute some level of visual obstruction, there is no obstruction if you stand on the hill above it or next to it, and look down on the village. This seems to have escaped the authors of the Pegasus study who drove past, and looked from one vantage point from behind a tree in summer. Both Shere and Gomshall are visible from long distances from the

ridges on the hills that surround them, and the openness of the fields, hills and woods creates the perfect English landscape of “woods, and hills and little rivers” (JRR Tolkien)- which is why it is so popular for filming. Both villages can be seen from the tops of ridges across the valley with the villages nestling at the foot of the Downs. I am attaching a few snapshots of photographs from local footpaths showing views into and out of the village; more can be provided if required.

In relation to Gomshall, the authors acknowledge the openness of the village. The question is asked “do open areas within the village appear continuous with surrounding open land beyond the village- from within and/or outside of the village.” The response even within the GBCS is that areas of open land within the wider Green Belt are *intermittently visible within or beyond the perceived village area*.

The openness of the visual connections to the wider Green Belt are similarly not disputed: *Visual connections to open land within the wider Green Belt are located near the village centre at Goose Green*.

Again they question whether woodland or trees disrupt views in certain areas, but the same reply re deciduous trees is valid.

It is demonstrable – through photographic evidence in addition to the actual comments of the Pegasus group – that the open character of the village does contribute to the open quality of the Green Belt.

“Open” is not a term that has yet been much defined in case law. In itself, this definition of villages suitable for inclusion in the Green Belt seems to be potentially problematic. Pegasus appear to be construing *not open* as being obstructed by trees (seeming rather oddly to feel that trees therefore are not a feature of the Green Belt). It is questionable whether the requirement to have “open” villages with “open” views will not have perverse consequences – small clustered English villages surrounded by woodland will be excluded, but housing estates on large grid structure roads will not. This is not going to be perceived as acceptable publicly. It must be assumed that case law will start to demonstrate some common sense in the way in which this clause is interpreted.

Even despite this view, the fact that there are views across the valley and into the villages means – in the context of the topography of Shere and Gomshall - that they *are* open visually (from standpoints around the valley) into the village. Similarly the villages are open to a view from the side and looking into the villages. Both Shere but particularly Gomshall are directly overlooked by the wide open spaces of Netley Park (NT park and woodland). Any building would also be visible and would disrupt that current relationship between the built environment and its setting, to its inevitable detriment. Given the particularly high landscape value in this area, any incremental building in any extension of the existing settlement would be wholly inappropriate.

The reference to Open character of the villages seems to be a perverse rule or wording which may in due course be modified by case law. Whether these villages have an “open” character has been disputed by Pegasus. This time it is Gomshall that fails Pegasus’ test. It has noted that “Gomshall – with pockets of high density development - the majority of the village is considered to exhibit an enclosed character”. This is despite the fact that the village has a large village green – Goose Green – which is visible into and out of the surrounding countryside. This should be contested.

Shere conversely *is* considered to be open – but only because they wish to extend the settlement boundary to surround the sports field, fields north of Upper Street, open farmland between A25 and Gomshall Lane (ie opposite NT land at Netley Park); to the hedgerow south of High House farm (ie as noted in the photographs) and woodland to the west of Chantry Lane, inter alia. The “open character” therefore gives a huge increase in the settlement boundary.

In fact, we as local residents would submit that the existing boundaries of the settlement are sufficient. The *open* character of the villages is demonstrated not from these aggressively extended boundaries, but from the fact that they can be viewed from a distance as a component of a vista, and that in both cases there is public open space at the heart of the villages (in Gomshall’s case Goose

Green; in Shere's case, The Square. This is the open character of the village that constitutes an element of the openness of the green belt, not the fact that there are fields around the village that developers wish to use for building.

On this basis the rather aggressive test set out in full in NPPF 86 that if *it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt*

is fully satisfied in relation to both villages. Both should remain in the Green Belt. Insetting is not appropriate.

In addition to remaining within the Green Belt we consider that the settlement boundaries should not be revised. This is where Pegasus starts to construct new boundaries to the villages, looking at tree belts as key factors.

If Pegasus extend the boundaries as they propose, GBC would be in breach of the various requirements set out in NPPF and in statute in relation to AONBs. The boundaries of Gomshall and Shere are almost unchanged since the Domesday book, and these should be respected. The requirement under NPPF 87 is that *As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.* [which, it is needless to say, have not been demonstrated].

Other factors

As has been noted in law in relation to Green Belt in the past, Green Belt is not in itself a designation of countryside or scenic quality, and even dereliction is not a reason for altering boundaries (per historic PPG2 2.6 which, although superseded, is the basis for NPPF here). As a matter of fact this is not an area of dereliction but is an area of the highest possible landscape standard. Development or inseting would also conflict with the purposes of Green Belt as defined in NPPF and (previously) PPG2. The fields where the settlement boundaries are being amended are part of the surrounding agricultural land. The quality of the rural environment as such an amenity will be irretrievably altered by the proposed adjustment of settlement boundaries and the loss of the green belt status within the villages.

As will be seen from aerial photography, the main part of the conservation area involves a relatively small acreage of dense building, with enormous character. Shere does not have a large hinterland of suburban type sprawl, and in this is particularly rare. To a great extent in this village, old (mediaeval etc) houses are surrounded by countryside, with impressive scenic views from the surrounding hills into and over the village. (as has been frequently demonstrated by film makers).

While brownfield sites within Gomshall have been developed, in the Tannery and archery sites, the village is recognisably a small cohesive village within defined boundaries, around a traditional village green with a historic water mill. It too has historic importance, as can be evidenced from the school parties who daily visit the village on field trips throughout the summer months, including inspecting and visiting the Tillingbourne river at a rare point of safe access for school parties and coaches, and the Duke of Edinburgh parties that walk through the village

Rural Surrey

Shere and Gomshall are proposed by GBC as appropriate villages for inseting (ie excluding from the Green Belt). This is ridiculous, and has been accepted as such publicly by the local MP, Paul Beresford (meeting at East Horsley village hall, 7 November 2013). This proposal should be immediately retracted, and green belt should continue to wash over both villages.

Rural Surrey is a small pocket of land under enormous developmental pressure due to its proximity to London, the M25, Gatwick and Heathrow airports, the South Coast ports etc.. It encompasses the North Downs and large areas of AONB and Areas of Great Landscape Value. The demand for land to build homes in this area is potentially infinite, not least that the profit available to developers of homes in this area is very considerable. While the homes may be desirable, CPRE have been

informed that a ministerial letter states in a letter to Ann Milton MP that “*The Secretary of State wishes to make clear that when considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing is unlikely to outweigh harm to the green belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development in the green belt*”.

Transport and infrastructure issues

Gomshall represents an important access point to the Surrey Hills AONB because of the rail link, but this is a branch line, and the infrequency of the service makes this a poor mechanism for commuting. The pious hope that the train line will be improved with a more extensive service from the single train per hour that operates at peak times (which is not full) is unlikely to be met by commercial considerations. As a result, the train is not a practical route for regular travel and cannot be held out as a mechanism for minimizing car use, since living in these villages automatically involves extensive car use.

The road connections to both Guildford and Dorking are poor, with a hazardous road at Newlands Corner which should not be disregarded in the context of allowing any further development in this area. Road connections to Guildford and northwards are congested at peak times. A single road traffic accident on the A25 on the road to Newlands Corner can cause disruption for hours.

This is an isolated and astonishingly rural location, given its proximity to London, which has been preserved in this form partly due to poor transport connections. It is a triumph for the policy of the Green Belt. We don’t want better transport connections here because we are happy with this rural environment. However, the existing transport connections will not support any additional housing or commercial development in this area. Such sustainable growth as may arise will come from films, from agriculture and local food businesses, from tourism, and from home-working with use of computing and telecommunications infrastructure. All those businesses, which are currently thriving, would be damaged by an unintelligent support for “development” whether related to housing or commercial development.

AONB

Shere and Gomshall lie wholly within the Surrey Hills AONB which has had the same level of legal protection as the National Parks. The proposal to remove either village from the green belt is ludicrous, and it will be a matter of legal debate as to the consequential impact on AONB (equivalent to National Park) status. It will be easier to retain the green belt status for the villages as a whole, and inseting is inappropriate.

The area surrounding Shere and Gomshall is Green Belt (and Green Belt historically washes over the site and the village). It is also designated as AONB (Area of Outstanding Natural Beauty) and AGLV (Area of Great Landscape Value).

Creeping development is an enormous risk in an area under such developmental pressure as Surrey. Any relaxation of Green Belt provisions in this area at all would be of great concern to all inhabitants. It may allow an ongoing release of further land by establishing precedents or altering the pattern of the settlement. Of its nature, land is finite, and should not be regarded as a resource to be utilised.

Inappropriate location for additional housing

It is entirely inappropriate that villages that have been preserved for more than one thousand years should be destroyed or damaged by a sprawl of housing over a relatively short period. At the previous local plan enquiry GBC notified us that very few rural exception sites have been granted permission (two or three, within the last local plan period, in the whole of the Guildford Borough area, of which one is in the village of Gomshall. Subsequent exception sites have been (inappropriately) granted in both Shere and Gomshall.

Traffic

The roads in this area are a serious problem which cannot cope well with existing traffic requirements

let alone with increased numbers of housing. In an area with twice daily bus services, and two hourly train services, it is not realistic to anticipate that additional housing will not lead to an increased car usage. However the access to both Shere and Gomshall is via the A25 with the narrow and dangerous roads over Newlands Corner being the main point of access. The only other route from Guildford is via Shalford and Chilworth, a route that is congested and that cannot easily deal with existing levels of traffic. Newlands Corner is a nationally important beauty spot and it is unrealistic – and undesirable - to propose altering the roads to widen their capacity. As a result, any further development along the A25 is wholly inappropriate, and both villages should remain in the Green Belt.

Tourism

Tourism is stressed within the local plan as an important factor for the Guildford area and this is in accordance with the requirements of NPPF.

The area has both the historic routes of the Pilgrim's Way and the North Downs Way crossing through it and going through the villages of Shere and Gomshall.

The tourists come to walk the Pilgrims' Way or the North Downs Way, or the footpaths surrounding the village. They cycle or ride along the roads (Gomshall is part of the national Olympic route). School parties are present most weekdays through the summer in both villages. This would not be the case if the village boundaries were relaxed and there were more permitted development within the villages.

Wildlife

These areas are very important for all kinds of wildlife, not least because of the dark skies which are an increasing rarity in the South East. Further development would have an adverse impact in the locality. Adjacent and present within the village are barn owls, tawny owls, nightingales, robins, wrens, nuthatches, pipistrelle bats, bluebells, green and red woodpeckers, chaffinches, bullfinches, redwings, song and mistle thrushes, deer, and huge numbers of other species, which rely on a quiet and peaceful environment. Some of these species are of conservation concern, and nesting sites are of significance. "The species that are more abundant within Green Belt land than the Comparator Areas include the familiar blackbird, robin and chaffinch, as well as several species of conservation concern, such as mistle thrush, song thrush and starling" – Source: Natural England, SOGB. See also data from the National Trust re Netley Park and the Abinger Roughs.

The prospect of increased housing development in this area is wholly inappropriate and would have a significantly deleterious effect on wildlife.

History

Shere and Gomshall are villages that have remained substantially unchanged since Saxon times. The conservation area boundary might be recognisable from the village as described in the Domesday Book.

The history of the villages is one of the factors studied by school parties and is a major contributory factor to the village tourism (in the context of the rural environment). Once this is lost by losing the green belt status, it will not be possible to replicate the previous environment.

This response to this question incorporates by reference in full the BCARA response to Qu 30 (potential development areas beyond other villages including Shere, Peaslake and Gomshall, which has a bearing on the area) Qu 24 (targets for potential development land) Qu 23 (cross boundary issues).

For the avoidance of any doubt, the text of the reply to q 30 is reproduced here:

(then I have copied my q 30 – because it is all about boundaries of the village).

Conclusion

Shere and Gomshall are not appropriate for insetting within the greenbelt. Furthermore existing boundaries should remain unchanged.

Qu 22

Which option do you think would be best for the long term future of Ash Green and its residents?

As a village, Ash Green should be separated from the urban area, and its village status preserved. Boundaries matter, and they should not just be used as opportunities for land grabbing. Both the options here suggest additional development that is not in keeping with the proposed settlement hierarchy.

Qu 23

Do you agree with this analysis?

Are you aware of any other strategic cross boundary issues you think that we should be considering?

This is 2 questions not one.

1. NO I do not agree with this analysis.
2. YES I am aware of a huge number of other strategic cross boundary issues that you have totally failed to consider.

The only “option” given is under the [DUTY to COOPERATE Continue working actively and constructively with our partners to address cross boundary issues](#). – a very anodyne remark, apparently.

It is agreed that national planning policy puts an onus on all councils to cooperate. However, the largest area that has most of an impact on our Green Belt policy, and that does not appear to be considered at all by GBC, is Greater London. We have an obligation to cooperate with Greater London, and we are a significant and seriously threatened area that is of vital significance to the Metropolitan Green Belt. Cooperation in relation to that is of greater importance than fig leaf discussions with Waverley Borough Council in relation to some notional number of houses that has not yet been determined.

In the local plan there is no sign of negotiation as to the impact of the Local Plan on the metropolitan green belt nor on Greater London. Therefore it will not be possible to demonstrate to the Planning Inspector that this requirement has been met.

The proximity of Greater London is recognized in Appendix B, but only in the context of competing (!) with Greater London in terms of development.

A remark quoted in an earlier response is relevant here. On 11th July 2013, the Secretary of State, Eric Pickles MP said, in the course of a speech to the Royal Town Planning Institute, *“You can plan for growth but not at any price. So we have been very clear that we must have secure safeguards to protect the green belt. That vital green lung which prevents urban sprawl. Sometimes I feel politicians in particular forget that it is there, not simply for the beautiful landscapes, but to keep conurbations from running into each other. To protect the nature of what we call home.”*

The NPPF states that Green Belt land *should be opened to people to experience it, to the benefit of body and soul.*

It further states that a core planning principle (NPPF 17) is, in relation to urban communities, *protect the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it.* This plan is in diametrical conflict with that requirement, because it is a sustained and concerted attack on the greenbelt, dressed up as a requirement for

development, and then with words applauding sustainability (which have been improperly considered) as an overlay on that, without sustainability being an underlying principle for the planning process, as is required both by the NPPF and by UN obligations as set out in the preamble to the NPPF.

The requirement of preventing urban sprawl is in regard primarily to the metropolitan urban area of London. This can be easily seen in a map (attached) which shows the metropolitan urban area surrounding London, and it can be seen that Guildford, and the contiguous areas of Mole Valley, Waverley and Woking, are vitally important in protecting the green belt on the South Western side of London. This must and should be an overriding aspect of the local plan.

Furthermore, I am attaching a second map which shows in detail the damage to the greenbelt in a band somewhat north of this borough, running through Kingston, West Byfleet, Woking, Knaphill, towards Camberley. In this area, the greenbelt is so eroded as to be non-existent.

It can be seen that the development proposals of Mole Valley have already led to significant incursions into the green belt, running through Ashstead, Leatherhead to Bookham.

The proposals included in this local plan would significantly extend that swathe of development. Proposals involving Effingham, East Horsley, West Horsley, Ockham, Clandon, Chilworth, Shalford and the eastern outskirts of Guildford would tend to erode Green Belt in a continuous band between Ashstead and Guildford. Further developmental proposals, as set out in this consultation, along the Hogs' Back, involving Normandy, Compton and towards Ash would lead, in due course, to one large conurbation stretching across the Green Belt from Ashstead to Camberley.

The suggestions by the planning department at Guildford Borough Council, and indeed by various councilors, that it is necessary to choose *between* these areas is fundamentally wrong. The greenbelt, as is stated in the NPPF, is important because it prevents urban sprawl. It exists because it is open, not because it To attack individual small portions of land in order to facilitate urban sprawl and promote development is absolutely not in the spirit of the Green Belt nor is it permitted under NPPF. (See NPPF 87: As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances). No very special circumstances have been adduced in this consultation except that national planning policy has recently changed; this is NOT an adequate reason for destroying the Green Belt.

As noted above, the metropolitan Green Belt surrounds London, and it provides an important amenity for the entirety of Greater London. Because of this, arguably the consultation process for so fundamental an attack on the Green Belt should involve all users of the Surrey Green Belt and Surrey Hills Area of Outstanding Natural Beauty. It should be noted that GBC has refused to accept petitions in relation to building on green belt on the grounds that some signatories may not be resident in the borough. Since developers have been permitted to lobby on the grounds that they would like to move into the area, and the housing studies have asked people whether they might wish to live in the area, this is not equitable.

In the context of the importance of Surrey to Greater London, certain facts are relevant, in addition to that by Eric Pickles.

The area under attack includes a large part of the Olympic cycle route, and the new annual Prudential Ride London-Surrey Classic Cycle Route, as well as the National cycle route used last summer. None of these routes have chosen the Surrey Hills AONB because of suburban features or housing estate planning.

Boris Johnson said: "Following the superhuman efforts of our Team GB cyclists last year, thousands of cycling enthusiasts, both experienced and amateur, riding a fantastic route through the streets of our fine city is surely a fitting legacy. I am delighted that six months on from Laura Trott's breathtaking gold in the Omnium we are in a position to announce routes and title sponsor. Prudential Ride London is sure to become one of the world's top cycling events. The countdown to the start of the

event begins now.” David Hodge said: “Both Box Hill and Big Ben will show off the very best of Britain when **Surrey’s picture perfect countryside** contrasts with London’s famous cityscape during the 100-mile event. But entrants should put in some serious training as the hills in Surrey can prove tough if you’re not cycle fit.”

Source: <http://news.surreycc.gov.uk/2013/02/07/the-route-for-the-ride-london-surrey-100-and-classic-cycling-events/>

“It’s the biggest mass-participation cycling event ever to take place within the UK.” - Boris Johnson, Prudential ride website. Just as a reminder, the routes run through Ockham, West Horsley, Gomshall and Shere; all villages which this consultation plan proposes to remove from the Green Belt.

This area is important for ramblers throughout the country. The nationally important routes of the Pilgrim’s Way and the North Downs Way run through the villages of Shere and Gomshall (which this consultation considers suitable for removing from the Green Belt). The Pilgrims’ Way has views of both Shere and Gomshall; it runs in part through both villages, and footpaths along the route are in the area designated for extending the settlement boundary for additional housing. *The Pilgrims’ Way (also Pilgrim’s Way or Pilgrims Way[1]) is the historic route supposed to have been taken by pilgrims from Winchester in Hampshire, England, to the shrine of Thomas Becket at Canterbury in Kent. This name, of comparatively recent coinage, is somewhat misleading as the route follows closely a pre-existing ancient trackway dated by archaeological finds to 500–450 BC, but probably in existence since the stone age.[2][3] The prehistoric route followed the "natural causeway" east to west on the southern slopes of the North Downs.*Source: Wikipedia.

The North Down’s Way official guide describes walking along the route from St Martha’s Hill “into the pretty village of Gomshall”. Other recreational and tourist uses of the North Downs are covered in this website: <http://www.surreyhills.org/surrey-hills-explore/walking/north-downs-way-national-trail/>

The cycle trails, and rambling trails, are important links that should not be omitted in the consideration of the importance of the obligation to consider cross boundary issues. These issues are not considered except in terms of the “[provision and management of accessible and connected open space and the protection of important landscape designations such as the Surrey Hills Area of Outstanding Natural Beauty](#).” It is the landscape and not just the designation that requires protection, and this will not be effected by the removal of Green Belt status within the villages, nor the extension of settlement boundaries for green belt villages.

Duke of Edinburgh routes use the footpaths of the Surrey Hills almost continuously through the summer months. Horse-riding is also important. All dog owners walk their dogs on a daily basis; social groups organise large rambling parties, especially for older or younger groups, with important social consequences. The green belt area is an important recreational facility for all the residents of the borough of Guildford and of Greater London as a whole.

The following website is relevant in its entirety and should be incorporated by reference into this response.

<http://www.naturalengland.org.uk/ourwork/conservation/designations/aonb/surreyhills.aspx>

In particular, the opening section is of significance:

“Surrey Hills

Spanning Surrey from east to west, the much-loved, much-used hills of this 'front line' AONB are a beleaguered green expanse which, together with the Green Belt, hold back London's advancing commuter sprawl.

The AONB links together a chain of varied upland landscapes including the North Downs, traditionally the day trip destination for southeast London. Rising near Guildford as the narrow Hog's Back, the ridge of the downs stretches away to the Kent border, an unmistakable chalk landscape of swelling hills and beech-wooded combes with a steep scarp crest looking south to the Weald. The downs are paralleled to the south by an undulating wooded greensand ridge, rising at Leith Hill to southeast England's highest point (294m). In the west, sandy open heathland, typified by Frensham Common, stretches away to the Hampshire border.

The AONB's fine deciduous woodlands have considerable ecological importance as do the AONB's surviving stretches of chalk grassland and unimproved heath. Including as it does, showpiece villages such as Shere and Abinger, the AONB's built environment is an intrinsic part of its quality."

Within the area east of Guildford, the National Trust has sites at Clandon Park; at Netley House in Gomshall, at Hatchlands and at Polesden Lacey. There are nationally important sites at Shalford and along the Wey. This is not an area where commercial development begins to be appropriate, and it is important to protect it for the nation as a whole and for future generations.

Qu 24 Which of these choices do you think are most appropriate and are there any others that we should be considering?

The consultation paper asks about the appropriate choices, without giving an indication of the number of homes that it considers to be fundamental to the decision making process. It is not possible for the residents of Guildford to determine what might be an appropriate response to the plan without knowing the real implications of that plan, and anything else is deliberately deceptive.

This consultation document appears to suggest that there is a need for a small, negligible erosion of the green belt in order to provide essential homes, and that the essential quality of the green belt will remain unchanged despite a few necessary homes being built. This is not what is proposed by this plan.

A number of options are considered within the plan. (The consultation document does not number, but I have numbered for reference here).

1. [Redevelop appropriate buildings and spaces in our towns and villages.](#) This would involve converting existing buildings and providing new buildings within the existing urban areas of Guildford, Ash and Tongham, and within the existing boundaries of our villages, to provide new homes and other buildings. These kind of sites are often, but not always, land that has been developed before (previously developed land). Our research in the SHLAA tells us that continued development in these areas could provide 3302 homes in the years 2015 -2031. Yes. Provided that such development does not encroach on open spaces such as village greens, woodland within villages, green spaces in the town or involve garden-grabbing, I think that most residents of Guildford would consider that this was acceptable. Provided that there is no intention to build on such open spaces (which should itself be enshrined in the plan) this would be the best option. The estimate within the SHLAA might in itself be subject to question, and the impact of windfall sites will need to be taken into account in meeting the levels on an annual basis. Such sites will be available and therefore the previously developed land should meet the need for the foreseeable future. However, as noted elsewhere, the consultation document does not attempt to identify all possible brownfield sites and perversely excludes significant numbers of identified brownfield sites in a way that is unacceptable. It is possible to build on the estimated 20 hectares of previously developed land identified in the report excluded from consideration for housing, and on a number of other sites not identified in the plan but proposed by members of the public and that could be undertaken sensibly on behalf of the residents of Guildford. Therefore, for the plan period of 2015-2031, there are sufficient brownfield sites in the Guildford Borough to meet all need for homes, both market and affordable, that the area can support; this can be estimated to be around the 300 per annum that has been the interim measure in use and

that has been supported by John Baylis' study for the Guildford Society, which identifies a need for no more than 322 homes per annum, taking into account the natural growth of the Borough.

On the understanding that this brownfield land is aggregated with the proposed homes set out in 3 below, there will be sites for approximately 3571 homes available (per the consultation). This compares, on the interim use basis, with the requirement on the existing basis for around 4500 homes. As previously noted, demand must be controlled; it is potentially infinite, and there could be pressure to build enough homes to cover Surrey; this must however be resisted.

However, if the most obvious brownfield land identified in the study but *not* included in the housing allocation (reserved land on commercial sites) is now included, because it is urban land those 12.4 hectares will generate a further 496 homes at 40 homes per hectare (GBC proposed urban density). We therefore require no more than 10 more hectares of brownfield land in towns to meet ALL the requirements of the interim housing pattern, without any building at all on greenfield sites, on the basis of the proposed uses by GBC. A study can be undertaken to identify such sites; the public have already proposed a number of potential areas.

If the residents of Guildford are prepared to contemplate a density of 50 homes per hectare on previously developed land then the brownfield sites already identified as suitable will meet all requirements for additional homes, without any need for any of the additional sites. Realistically, there will be windfall sites over the next 15 years which can also be taken into account.

In addition to this, GBC has identified significant amounts of brownfield land within the study as suitable for housing and marked its potential for housing as "GOOD". (Appendix D). However, in the Site Options section here (points 9.24-9.36) almost all of these good housing sites – with the exception of the important open space near the Cathedral – are earmarked instead for either mixed use or commercial use, so the utilisation proposed will be significantly lower than the proposed 40 housing units per hectare. This is completely ridiculous and an outrage. If these good housing sites are taken into account on the basis that the perceived housing shortfall in the borough is an over-riding concern, which must override other considerations, then there is abundant urban land available to meet all housing needs on a reasonable basis.

As a result, there is no actual need to attack the rural areas, because brownfield sites will meet all requirements on the existing interim basis for the duration of the plan. Development in any of the rural areas is therefore not required unless the housing levels are increased from the interim level.

This is therefore the position that the councillors must support in terms of the proposed housing numbers, and this is the level that is acceptable to the residents of Guildford and other users of the Surrey Green Belt.

2. [Use land on the edge of villages to provide affordable housing for local need.](#) This option involves building new affordable homes on land outside of but closely related to the existing boundaries of villages to provide affordable homes. These are known as rural exception housing schemes as they are allowed as exceptions to the normal planning policies that discourage new homes being built on the countryside [!!!]. Local communities sometimes suggest opportunities for schemes like this after a survey has identified housing need in their parish. We cannot permit rural exception sites of this kind around the urban areas of Guildford, and Ash and Tongham. – 160 homes 2015-2031 Acceptable but only at this level and subject to very strict limits. As noted in the response from BCARA to question 6 in particular, affordable housing is not defined within the consultation document. In practice definitions have been blurred in the past, so that the rural exceptions scheme has been used – in historic contravention of PPG2 and planning rules – to provide owner occupied housing which has subsequently been sold commercially. This is unacceptable, but once the green field sites are destroyed it is impossible to restore them. As a result, the proposed amount of 160 units should be an absolute maximum for the operation of this scheme over a 16 year

period, ie there should be no more than 10 units per year. This has not been the case historically, where the rural exception sites scheme has been aggressively used in the AONB.

3. [Reuse previously developed land in the countryside.](#) Previously developed land (defined in the NPPF) which is or was occupied by a permanent structure, *including the curtilage of the developed land* [my italics] although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure in the countryside that has potential for appropriate redevelopment to help meet future development needs. 269 homes 2015-2031. Acceptable. Again as for 1, this would be acceptable, subject to stringent design restrictions, assessment of the environmental and other impact of any development on the local site in accordance with the requirements of NPPF if such development lies within the Green Belt, consideration of the impact on infrastructure, and the sustainability of any development. It would also have to ensure that there was no adverse impact on other aspects of the existing area, in conjunction with the specific requirements of NPPF.
4. [Use countryside land in the west of the borough.](#) We could provide development by extending the existing urban area of Ash and Tongham into the countryside to help meet our housing, employment and infrastructure needs. (Extension(s) to the Guildford urban area is another option that is explained below. This could provide new neighbourhood(s) within reach of existing transport links, shops, schools, and health care, as well as bringing new or improved services and facilities that may also benefit surrounding existing residents. 2004 or 4556 homes 2015-2031. Probably no. This is much less desirable. All Green Belt land should be wholly protected, whether or not it is close to urban areas. Although some of this land is outside the Green Belt, if it is a greenfield site it should be regarded as worth protecting and should be respected. The urban sprawl has already damaged the Green Belt, as noted; so protecting adjacent green field sites are also important. As previously noted (see response to 1 above) the existing brownfield land in the Borough, sensibly used, will meet all our needs for the next 16 years.
5. [Use countryside in the centre of the borough by extending Guildford's town's boundaries.](#) We could extend the existing urban area of Guildford into land currently designated as Green Belt to provide new neighbourhoods to meet some of the development that the borough needs in the future. Development in locations like this could integrate well with the existing facilities and services in Guildford town, whilst providing new infrastructure which may also benefit surrounding existing residents. 1782 or 3563 houses 2015-2031. NO. This is urban sprawl, and will lead to erosion of the Green belt. As noted in 1 above, brownfield sites do actually provide sufficient land if intelligently used.
6. [Use countryside to expand around villages.](#) We could expand our villages by developing some of the countryside that adjoins their existing boundaries. Providing new homes and business space can help to support the rural economy [it doesn't need support. We have a low unemployment rate of 4.7%, high average income and a [very] strong tourism economy, per Appendix B – remember? Did you copy this clause from a deprived rural area plan? It doesn't apply here]. [including local services within a community 2510 houses \(!!!\) 2015-2031](#) **NO.** This is a bribe to get us to accept more congestion, more pollution, and a poorer quality of life, which will not be paid in practice. Under the restrictions of the CIL, after Spring 2014 developers will not be asked to pay for incremental services; which means that such improvement in local services as may be promised will be paid for by GBC residents. NOT acceptable under any circumstances, for all the reasons stated in the replies to Qu 23, 21 and others. This is almost as many houses as are planned on brownfield sites in Guildford, Ash and Tongham combined.
7. [Significantly expand an existing village.](#) We could expand a village that has [a] good range of services including transport links as we plan for new development through the local plan. 4920 houses 2015-2031. **NO. This is urban sprawl. The Green belt is precious and is under threat – see the map attached to the reply to Qu 21 incorporated here by reference. See all the arguments about the importance of the greenbelt in qu 21,23 and others. This size of settlement increase would completely change the quality of the greenbelt for the existing residents and for ever.** This is unsustainable in theory and in practice. It will increase commuting, increase congestion, increase the use of fossil fuels, damage the environment. It

is not sustainable development. Restrictions to development under NPPF in green belt areas preclude such development; see NPPF 87 – “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.

8. [Create a new village](#). This would mean building a new settlement with homes, employment and supporting infrastructure. As it would be a stand alone settlement it would require a scale of development that could provide the facilities and services to support itself. This includes jobs, shops, community facilities and leisure opportunities to reduce the likelihood that it becomes a dormitory area from which residents need to commute. **NO. As above. This is urban sprawl. The Green belt is precious and is under threat – see the map attached to the reply to Qu 21 incorporated here by reference. See all the arguments about the importance of the greenbelt in qu 21,23 and others. This size of settlement increase would completely change the quality of the greenbelt for the existing residents and for ever.** As above of course it will be a dormitory area. It is not conceivable that there will be employment for 2000 (x 2) people located within a village, and in the current climate in practice we do not exist economically by taking in each others’ washing. This is unsustainable in theory and in practice.

In summary, in response to this question, the level of housing at around the 300 new homes per annum level can be supplied within GBC by use of existing brownfield sites at around the proposed urban housing density, without any incursion into the Green Belt. This is in accordance with NPPF, with ministerial guidance, with stated national housing policy and the wishes of the residents of Guildford.

This plan, which, it has previously been noted, is not produced under the required consultation provisions or process, is an aggressive and unwarranted attack on the Green Belt. Under the proposals of the SHLAA as summarised in this document the total number of homes proposed is 21456, of which 85% (18154 homes) are proposed for rural areas. This is utterly unacceptable.

NB at this point the consultation document’s poor drafting is unclear as to whether the site options should be covered by Qu 24 or Qu 25. If it should be included in Qu 25, please allocate the response to that section. If it should be incl in 24, added below as an excel spreadsheet. Please open and include as part of the response to the question.

Qu 25

Are you aware of any other land in the existing urban areas of Guildford, Ash and Tongham, within the existing boundaries of our villages or previously developed land in the countryside that could meet our future needs?

Unclear as to drafting as to whether the text relating to sites and options relates to this question or the previous question but will include response in both.

See spreadsheet attached below, and also see comments on the previously developed land in the response to Qu 24.

I have looked at the numbers presented by GBC in the context of previously developed land. I have looked only at sites 1-26. I do not understand why RHS Wisley or Merrist Wood are classified under previously developed land and consider this to be inappropriate. Guildford College has an ongoing educational function, and the open spaces adjacent to the Cathedral are of importance to all residents in the borough. [Why do the planning department prefer to plan to build on green fields or open space rather than brownfield sites? This is in contravention of NPPF and general planning policy – see].

Looking at sites 1-26, excluding the four already mentioned, a number are identified in Appendix D as suitable for housing and indeed marked as "Good" for this purpose. However, none of the brownfield sites identified are targeted primarily or exclusively for housing. Many of the brownfield sites in Guildford are identified as "poor" as far as potential for housing goes, basically just because they are reserved for potential future development, even though they are currently poor or unused commercial space. This is unacceptable since there is currently a superfluity of office space in Guildford (the old SEEDA site has been empty for a considerable period, with 21 000 sq feet available; there are empty sites on the Guildford Science Park and the Business Park, and near the Friary. We do not need to reserve commercial space that is unlikely to be used in the near future and this is in contravention of the principles of the NPPF. In this context Roland McKinney's excellent study in relation to Employment Land makes it clear that the assumptions underlying GBC's projections are flawed both in relation to the extent of Employment Land requirements and those of consequential workers. As a result, since the brownfield sites are not imminently required as employment land, they can be released for housing.

Furthermore, as noted in the response to Qu 24, and Qu 4, GBC's assumptions in relation to housing density are very low. The excellent study prepared for the Greater London Authority in October 2012, quoted in that reply, which extended the spatial requirements of affordable housing to the commercial sector, with due allowance for public space and space between buildings, noted that terraced housing can provide 64 homes per hectare, 3 storey apartments can provide 115 homes per hectare and 4 storey apartments with lifts (not appropriate in much of Guildford, but perhaps in some site specific locations) can provide 200 homes per hectare. This is not high rise accommodation. GBC is using calculations of 40 homes per hectare. This could sensibly be increased to avoid damaging the Green Belt or settlement boundaries.

If the sites 1-26, provisionally excluding 13 (Land at Guildford Cathedral) 18 (Guildford College) 24 (land around Merrist Wood) and 25 (land around RHS Wisley), are utilized at 40 homes per hectare, then the housing provided would be 7335 homes. This would be more than sufficient to meet the requirements for the duration of the plan. Current interim utilisation is at a level of approximately 300 homes per annum, which for the duration of the plan (16 years) would be 4800 homes.

If these existing sites were utilized at the level of terraced housing, including parking, then there would be 11600 homes generated.

If these existing sites were utilized to provide 3 storey housing, then they would generate 11769 homes.

If they provided 4 storey housing, they could provide 21 147 homes.

Even at the level produced by the study where up to 21 456 homes are indicated as an illustration, it is demonstrable that ALL the land required can be provided on existing brownfield land within Guildford, provided the density is appropriate. If there is a choice to be made between using the Green Belt and marginal increases in housing density, then, in the interests of wider society, housing density should increase.

However, there are questions about the level of housing requirement, which of course are not covered under this study. As noted in this response and elsewhere the Employment Land study is flawed and the expectations of requirements on this basis are not reasonable. There is the potential that there may be ever increasing and potentially unlimited demand for housing from London outflow, especially since Guildford's homes are relatively much more affordable than equivalent homes in Greater London. However, as noted under the provisions relating to the Metropolitan Green Belt, and in relation to the reply to Qu 23 (cross boundary issues) there are overriding requirements in the interests of society as a whole which mean that these should be resisted.

There is no requirement for needing to amend the status of any AONB village under inseting provisions. There is no requirement for any village within the Green Belt to be inset. There is no requirement to change settlement boundaries, and there is no requirement to build on

In fact, as argued by the GRA, there are infrastructure constraints which mean that the number of homes expressed as a possible maximum in this study would not be appropriate for the borough as a whole. In fact the interim level of around 300 homes per annum should meet all possible reasonable needs for the borough as a whole. This would also allow due consideration of alternatives and an opportunity to focus on the long term requirements of infrastructure. However, those constraints do not mean that it is appropriate to put housing on greenfield sites, and the Greenbelt settlement boundaries should not be amended.

It is notable that the study undertaken by Pegasus Planning Group was instructed not to identify possible brownfield sites (as required by the NPPF) but to identify possible greenfield sites. See <http://www.guildford.gov.uk/CHttpHandler.ashx?id=15360&p=0>

This states, inter alia, that the parameters of the Guildford Green Belt and Countryside study must “provide a robust, independent assessment of the Guildford Borough’s Green Belt and Countryside beyond the Green Belt with a view to potential release for development purposes in the longer term, should this be necessary within the GDF plan period 2016-2026 (and up to 2031) identifying realistic sustainable location(s) for green field release.”

There is no requirement to identify previously developed sites either within or outside the settlement boundaries of towns or villages. This is a study that is a deliberate attack on the Green Belt, without any possible legitimacy or validity.

It should also be noted that Pegasus Planning Group are development consultants and have a particular expertise in ensuring that developments are processed. They are an odd choice for independent consultants in an exercise such as this, since they have an agenda which is pro-development. The current list of clients listed on the website, as of 18 November 2013, is Richborough Estates, AGM Holdings, Woodstock Homes, Cirencester Opportunity Group, Hive Energy Ltd. Projects listed for consultations have as clients Charles Church Homes, Persimmon, Wilson Bowden, Miller Homes, Gallagher Estates, Persimmon. Their mission statement is “Pegasus’s mission is to provide expert, accurate and effective advice to steer their clients [sic] projects through the planning system and achieve optimal outcomes”. Their website includes this statement “Recognising the need for expert advice and guidance, Pegasus Group set up a specialist consultation team to help guide clients as they respond to the challenges of this changing agenda. The new team will work with clients to help shape their approach to pre-application consultation in a way which is positive, meaningful, inclusive and capable of providing a real return on the investment. One of the most important challenges will be to deliver public consultation in a way which will withstand scrutiny later down the line. In order to do this Pegasus has developed 4 basic tests to help clients; Local Authorities assess the adequacy of their approach; and consultation strategy.” [sic]

It is not clear why GBC wished to use a development consultant to appraise possible development sites in the Green Belt and indeed in the AONB on green field land, but has not chosen to spend public money identifying brownfield sites within the settlement boundaries.

Even without further study, it is clear that there is sufficient brownfield land to meet all reasonable planning requirements for the foreseeable future. On this basis, it is wholly inappropriate to revise settlement boundaries for either town or villages. There is no need to consider development in the Green Belt or the AONB at all under any circumstances. While the same protections do not apply under the NPPF to the land beyond the Green Belt, there is no direct need to utilize this land either. Urban brownfield land will meet all reasonable requirements for the duration of the plan.

NB this question actually asks for additional land in addition to a commentary on specific sites. Potential other brownfield land that could be utilized includes

- The Plaza site
- Hospital Car parking. Obviously the car parks are essential here, but underground car parking with 2 underground storeys could provide equivalent parking to the existing sites, with the possibility of providing homes for key hospital workers above ground level.
- Parking next to the court area in Guildford (car parking)
- University car parks – build student accommodation

- Some brownfield sites in the Rydes Hill area, near Jarvis centre
However a proper study to identify brownfield sites should be identified.

The Council should note that it has spent GBC taxpayers' money in the Pegasus study that is unwarranted, because the instructions given (quoted above) are directly in contravention with the specific requirements of NPPF (NPPF 51,79,80, 87,88). It has a fiduciary obligation to spend our money responsibly. The planning process is intended, under NPPF, to give us a plan that we as local residents want, not one that the Planning Department intend to impose on us.

Qu 26

Do you support using more land surrounding Ash and Tongham to help meet our future needs and is there any other land we should be considering?

Much of the previous response (Qu 25) should be incorporated by reference. While the land around Ash and Tongham is outside the Green Belt, it is still rural land, some of it of high agricultural value (and as previously noted, in a period of climate change, food security in temperate zones is of increasing importance). As a result, while not subject to the full protection of the NPPF, I would not support using land surrounding Ash and Tongham. As noted in full in the response to Qu 25, I have argued that a sensible appraisal of the existing data demonstrates that there is adequate land for sufficient homes to meet reasonable needs within the existing settlement boundaries on already developed land.

Qu 27

Should we alter the Green Belt Boundaries to make the changes detailed?

The reply to qu 25 should be incorporated by reference here. This question appears to relate to the proposal to increase Green Belt boundaries around Ash and Tongham. Provided that it is appreciated that there is sufficient brownfield land within existing settlements for future reasonable housing demand , so that there is no reason to sacrifice existing Green Belt status elsewhere, then I would support extending the Green Belt boundaries around Ash and Tongham as proposed. However, if this is at the cost of existing Green Belt status in other areas I would not consider this appropriate.

Qu 28

Do you think we should develop this land to help meet our future needs or are there other more suitable sites?

The BCARA response to Qu 25 is incorporated in full in this response.
As noted, there is sufficient brownfield/previously developed land within existing settlement boundaries to meet all reasonable foreseeable needs. The use of Green Belt land to build more out of town supermarkets is inappropriate, especially land in the AONB and Green Belt (Blackwell Farm, Hog's Back or Merrow Lane). Is this the Aldi/Lidl that the planners feel is required for Guildford? Replacing AONB with a Lidl is not the over-riding public interest that allows suspension of Green Belt status and is unacceptable. It is not necessary to expand settlement boundaries in these areas. There should be utilization of more suitable sites inside settlement boundaries within the urban area if such development is really required, which is a matter of some dispute.

Qu 29

Do you think we should develop this land to help meet our future needs or are there other more suitable sites?

It is believed that this question relates to sites 39-61 – land surrounding villages.
The BCARA response to Qu 25 is incorporated in full in this response.
As noted, there is sufficient brownfield/previously developed land within existing settlement boundaries to meet all reasonable foreseeable needs. The use of Green Belt land for such an increased level of housing is inappropriate, especially land in the AONB. It is not necessary to expand settlement boundaries in these areas. There should be utilization of more suitable sites inside settlement boundaries within the urban area for such housing as is reasonably required.

This is in contravention of the principles of the NPPF and is a direct attack on the Green Belt and AONB.

AONB villages should be particularly protected. There should be no alteration of any settlement boundary within AONB areas which have the formal protection of National Parks (as argued in Qu 21, 23, and elsewhere).

Brownfield sites within the town boundary are sufficient to meet all reasonable housing needs as is argued fully in Qu 25. The brownfield sites in the town are not required to be reserved, which is in contravention of NPPF, but should be developed for the benefit of the town and its residents. This does not mean garden grabbing or attacks on urban open space. However, the green belt needs to be protected as a matter of overriding public concern, not only in this area but as a matter of national concern and importance.

Qu 30

Do you think we should do more work to assess potential development areas around other villages and settlements?

This refers to the statement [Land around villages within the AONB \(Puttenham, Compton, Albury, Shere, Gomshall, Peaslake and Holmbury St Mary has not been assessed for their development potential as part of the GBCS](#). NO. Actually it has already been reviewed re Shere and Gomshall, inaccurately (see q 21), and the GBCS has already made very inappropriate proposals in relation to extension of settlement boundaries, including moving the boundary to the outskirts of fields, extending the historic boundaries of villages that have been unchanged for a thousand years. [Further work is needed as there may be opportunities for small scale growth in the AONB that would not harm the high landscape quality of this area](#). NO. The AONB does not exist in order to provide land for developers as if this is an infinite resource, and under the requirements of the NPPF there should be presumption against development except under very special circumstances. This proposed fishing trip is not identifying special circumstances but providing a charter to developers.

Development around villages outside Guildford's are will impact adversely upon Guildford, bringing more traffic into the town, on the approach roads into the town and on rural roads. The rural roads are themselves not suitable for increased traffic flow. See in this context a letter written by the BCARA Residents' Association in relation to the traffic impact along the roads in the village of Gomshall. It is demonstrable that such increased traffic flow will increase CO2 emissions and this will have a seriously adverse impact on climate change. Furthermore, houses in rural locations require more fossil fuel in order to maintain the same heating level as urban homes, and this too has a major CO2 impact. If development is to be sustainable, then it cannot be located in remote rural locations. This is not feasible.

Cross boundary issues are relevant here, as discussed extensively in the BCARA response to qu 23 (incorporated in full into the response to this question by reference). Of particular note is the fact that this area is crossed by the Pilgrims' Way and the North Downs Way, both walks of national importance that overlook or run through the two villages of Shere and Gomshall; that the area is one of the main access points towards the Hurtwood, one of the key recreational areas within the Surrey Hills AONB; that the Surrey Hills AONB has an over-riding management function in relation to development within the AONB; (as noted: *"The Surrey Hills AONB unit undertakes work on behalf of the Board and prepares and implements the Management Plan, which formulates policy for the management of the area"* (Source: Surrey Hills website).

A remark quoted in an earlier response is relevant here. Ministerial guidance is a gloss on the NPPF. On 11th July 2013, the Secretary of State, Eric Pickles MP said, in the course of a speech to the Royal Town Planning Institute, *"You can plan for growth but not at any price. So we have been very clear that we must have secure safeguards to protect the green belt. That vital green lung which prevents urban sprawl. Sometimes I feel politicians in particular forget that it is there, not simply for the*

beautiful landscapes, but to keep conurbations from running into each other. To protect the nature of what we call home.”

In this context various sections of NPPF are relevant. These sections apply to all the area within the parish and council ward of Shere, covering the villages of Shere, Gomshall, Peaslake, Holmbury St Mary, Farley Green and part of Abinger. The local plan has an obligation to *identify areas where development would be inappropriate, for example because of its environmental or historic significance* (NPPF 157). This would be true of the Surrey Hills AONB, and this status has been definitely confirmed by the status conferred on the area and approved by Natural England.

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance: <http://www.sheredelight.com/history.html>

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming. See <http://www.sheredelight.com/films.html>. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): <http://en.wikipedia.org/wiki/Gomshall>. This notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as *Gomeselle*. It was held by William the Conqueror.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey Hills organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive that building a house is “Growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth).

The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish. <http://www.theaa.com/walks/with-the-romans-and-celts-at-farley-421068>

The area of Abinger Roughts and Netley Park is listed on the NT website; this link is incorporated into this section by reference: <http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to->

[get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map](#). The guide to the locality from the NT (see website link, incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. <http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobk ey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true>

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and that they have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: [goldcrests](#), [woodpeckers](#), [wrens](#), [treecreepers](#), [song thrushes](#), [chaffinches](#) and [dunnocks](#).” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and they should not be disturbed. (Source: <http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/>).

This section of NPPF also notes that if significant harm cannot be avoided (which in this area is unimaginable) then planning permission should be refused.

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

As has been shown in the response to Q 25(incorporated by reference) the brownfield sites within the consultation document meet the reasonable needs of the borough for the foreseeable future, and therefore there is no requirement to reappraise land outside settlement boundaries in the AONB. GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance http://www.southdowns.gov.uk/_data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf. This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have an impact upon a National Park.

1. To conserve and enhance their natural beauty, wildlife and cultural heritage
2. To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a

statement of 1991.

Purpose of AONB Designation

- "...Is primarily to conserve and enhance natural beauty.
- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses."

Areas of Outstanding Natural Beauty: A policy statement (Countryside Commission, CCP 356, 1991), p5

AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. GBC appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of the US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban’ (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13. Source: United Nations Environment Programme, Global Environment Outlook GE04 – environment for development , 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

In this context, it must be wholly undesirable to consider the land around villages within the AONB in order to assess their development potential.

In particular, in relation to the area around Gomshall, Shere and Peaslake, these villages within the AONB are defined within boundaries established over the last thousand years, with the sites of the villages recognisable from the Domesday book boundaries. While there have been some houses built in the rural surroundings, these are few and disparate. There is no scope for further development in this area, because that would cause the villages to start to merge into each other. This would lose the defined quality that is one of the most attractive features of these villages, and that causes many film makers to choose these villages as archetypal English villages. As noted in the NPPF and other legislation (not repealed in relation to Green Belts by the NPPF) one of the key features of Green Belt is its openness. This openness is evident on inspection of the villages and has indeed been

acknowledged by Pegasus as part of their GBCS (see p 31 re Gomshall); it is further demonstrated by the images attached to this question and also to Qu 21, BCARA submission. The rural surroundings around the villages are vital to ensuring the landscape quality of this area. Under the NPPF it is noted that any development in Green Belt is by definition harmful; this is particularly so within the AONB, especially in the areas surrounding these villages.

Qu 31 Do you think we should do more work to assess potential development areas such as those outlined in the Issues and Options document and is there any other land we should be considering?

NO, the areas outlined in the Issues and Options document should not be considered as potential development areas. It is not appropriate to consider expanding a particular village inside the Green Belt.

As noted in the BCARA response to Qu 25, the GBC study identifies sufficient land for the foreseeable future to meet all reasonable needs in the list 1-26 omitting 13,18,24 and 25, plus other brownfield sites identified in the SHLAA. These should be sufficient without expanding existing villages.

In terms of other potential land that should be considered by GBC, too much land is already used on a surface car park basis in Guildford. While some of these have been identified as potential development sites in the SHLAA and consultation document, there are others which merit consideration. It would be possible to build student accommodation on the university car parks, with underground car parking as required. It would be possible to provide affordable housing for key workers on space above the hospital car parks, with underground car parks maintaining the total number of car parking spaces required. Other areas for underground car parks might include the Surrey Research park, the proposed Waitrose site, and the park and ride at the Spectrum.

Accommodation over shops and offices should be fully utilized. The proposed densities of development at Walnut Tree Close and Merrow Depot (at 11 homes per hectare as proposed in the SHLAA) are far too low, and these could be increased). Typical densities for 3 storey terraced homes with good room sizes are 64 homes per hectare (source: Greater London Authority). If the proposed densities were increased to that level on those two identified sites alone, it would give an additional 477 homes compared to the number proposed by GBC.

Qu 25 is incorporated by reference. There is no need to significantly expand any existing village.

Qu 32 Do you think we should do more work to assess a potential development area, large enough to be a new settlement, at the former Wisley airfield and or elsewhere?

As noted above and in Qu 25, the GBC study identifies sufficient land for the foreseeable future to meet all reasonable needs in the list 1-26 omitting 13,18,24 and 25, plus other brownfield sites identified in the SHLAA. These should be sufficient without expanding existing villages. It is certainly not necessary to create new settlements.

The objections identified in the consultation document are entirely valid in relation to the possible consideration of land at the former Wisley airfield: it is agreed that

- Any new residents would be reliant on the private car
- The land is close to the M25 and A3 junction and may increase the number of vehicles using these busy roads on a daily basis (and increase local congestion on extremely congested roads)
- Part of the land is within 400 metres of the Thames Basin Heaths SPA where new homes cannot be allowed
- A new settlement would absorb the delightful hamlet of Ockham
- Part of the land has planning permission for a large composting facility per the Surrey Waste Plan

For these reasons inter alia it is wholly inappropriate to consider creating a new village in this location or indeed in the Surrey Green Belt.

All the considerations relating to Green Belt areas noting in this document apply to this proposal – see qu 17 which is incorporated by reference.

In particular, it should be noted that while there are 60 year old tarmac runways crossing the site, most of the old Wisley Airfield is not actually developed but is actually countryside, open as is an essential characteristic of Green Belt. This is an attractive area protected by NPPF policy in relation to the Green Belt and in relation to protection of sites adjacent to important ecological sites. The SPA is significant in terms of biodiversity.

Qu 33 Do you support a new Park and Ride in the Worplesdon area or is there other land we should be considering?

There are concerns regarding Park and Ride facilities. These can actually contribute to urbanization of the countryside and potential sprawl. Artington used some AONB land for a park and ride and it has led to increasing development in the adjacent areas. It might be better to have town centre car parks plus a much better bus system for the locality. Town centre buses are quite good but rural buses are rare and do not serve the villages.

As a result any park and ride system that is proposed should involve multi-storey underground facilities (so as not to damage the environment and cause urbanisation).

IF the town centre cannot cope with the demands of increased numbers of borough residents driving in to the town, then then the town as a whole should not be encouraging expansion into the associated surrounding countryside.

Qu 34 Do you know of any potential SANG in the borough and can you suggest a location for a small car park for Effingham Common SANG?

SANGs (Suitable Alternative Natural Green spaces) are not quite as innocent as they sound. The effects of providing additional homes up to 5 kilometres from a Special Protection Area (SPA) (ie an area of bird nesting habitat etc) is to provide SANGs to reduce the consequential pressure on the SPA (from dog walking and leisure activities). If we didn't build so many houses next to SPAs then we wouldn't need so many SANGs.

Furthermore, as indicated by the question, SANGs in themselves can contribute to the urbanization of the countryside, with car parks, signage etc. Great care would be needed to ensure that SANGs do not spoil the character of the areas in which they are sited. Protection of the unspoilt rural character of AONBs should be given in the local plan, in particular to any area defined as a SANG within the AONB.

There should be a local consultation process in regard to any car park on Effingham Common. The feeling from the local respondents in relation to Effingham is that they cannot recommend any SANG areas. There is no requirement for a car park at Effingham Common, as there is a large car park at the Effingham train station. During weekends this car park is lightly used. In addition, there are several car parking spaces available at the cricket club. Both of these are adjacent to the common. If a car park is added – it's not natural, it's not green and therefore not appropriate for Natural Green Space. No car park is necessary.

Qu 35 Do you support the use of this land to help meet our future burial and cremation needs or is there other land we should be considering?

This question excludes certain sites as unsuitable having considered them. We agree that the excluded sites appear unsuitable, but the land next to Guildford Crematorium should perhaps not be excluded from consideration since GBC owns this land. What is the duration of the lease, and are

there break- clauses in the terms of the lease? What are the other considerations concerning this land which might be considered?

In relation to other potential sites, the same environmental and other issues arise. While burial grounds can be appropriate even outside settlement areas or within the Green Belt, they should not have a deleterious impact on the landscape or views as a whole and it may not be appropriate to have new land for this purpose in an area that is of particular environmental or other sensitivity.

In no circumstances would it be appropriate to consider the use of compulsory purchase orders in order to obtain land for this purpose. Generally this is not an appropriate power for the Council to use in relation to any planning matters, and would be the subject of enormous public concern. It is a matter of public comment that GBC has approached a number of landowners as to whether their land may be available for development in the context of the preparation of this plan. As a result, there must be a huge quantity of land that has been identified as available or potentially available (see Appendix D). Most of this land would not be appropriate for housing or commercial development (and this will be contested locally if it remains in the proposals). However, some sites, selectively and sensitively chosen, might be appropriate for burial land.

Qu 36

Do you support the use of this land (3 sites) to help meet our future allotment needs or is there other land we should be considering?

The issue of the land at Woodside Road needs careful consideration, because if this is within the settlement boundary it may be more appropriate to use this land, or some of it, for housing, provided that this does not reduce open space within the borough.

However, allotments are important socially and we support their provision. Selective creation of new sites which do not damage the landscape may be appropriate in various areas, although particular care needs to be taken with this provision within the AONB.

Qu 37

Do you know of any more land that we should consider for open space to help meet future needs?

As has been extensively noted within the consultation document, and is set out in Appendix B, Guildford has 9898 hectares within the Surrey Hills AONB. This is primarily open space which GBC has a statutory responsibility to conserve and protect. Woodland, agricultural land with footpaths and village greens and common land should specifically be protected and conserved as part of the Local Plan, which is only reiterating the statutory duty enjoined on the council as a matter of law.

Village greens, sports fields and other open areas which are currently protected under the provisions of Green Belt restriction must not be lost in any villages which are the subject of insetting from Green Belt. In particular, in the event of insetting within the Green Belt, there are specific spaces which should be considered. Shere recreation ground, the open spaces in the fields which surround Shere, especially those which present a view from the NT land of Netley Park with a direct view towards Shere, the open spaces at and next to Goose Green in Gomshall, the open spaces along High View, and other open spaces within the villages of Gomshall and Shere should all be subject to specific protection as designated Open Green Space under NPPF 76.

In addition, any new urban developments should be subject to the highest design standards in order to ensure that open spaces and link areas are well designed and provide a pleasant environment. Any physical development that is undertaken must of course be sustainable and that means must be subject to the highest possible design standards. Poor design and cheap construction is inherently unsustainable and contrary to the overriding considerations of sustainability, so attractive open spaces must be designed into all new development areas.

Qu 38

Do you think there are other issues we should be looking at as part of the Local Plan Strategy and Sites document?

I think the Local Plan should take the Surrey Hills AONB policy documents on board and accept them as overriding documents in relation to the AONB area, incorporated into the Local Plan with reference to the AONB. This is arguably the legal position in relation to the statutory provisions here in any event but it would be quicker and cheaper for all residents of the borough just to incorporate this at this stage rather than go through the process of testing this in court.

There needs to be much more understanding of the importance of the environment surrounding Guildford than has hitherto been the case. The town is attractive and its historic heritage is of enormous importance. However, it is because it is a discrete and separate town, set in the AONB and surrounded by spectacular countryside, that it is so important. Wimbledon, Dulwich and Richmond are attractive places with historic centres, but they are part of Greater London and they are undistinguished as a whole, merged into the whole conurbation. If you build on the surrounding countryside, and do not restrict development (which I would argue is in any event unsustainable) you will have a conurbation that stretches from Westminster to Aldershot and to Horsham, and you will lose the Green Belt.

If you do that you will not have the opportunity to build a town which is prosperous and strong. You will find that we live in an undistinguished outer suburb, and company headquarters will move out to the next attractive rural environment so that their senior executives can enjoy the high quality of life (with consequences for general health, employment and prosperity) that we currently do; and we will just be urban overspill.

There is enormous political concern about this concerted attack on the Green Belt, and it is not isolated to this area. This is a matter which concerns all residents of Greater London, because the Green Belt is a matter for those within the metropolitan area as well as those outside it. The people who come to walk, to cycle, to shop and to enjoy our area generally are important as stakeholders in this matter. This is not a matter only for developers who will make a short term profit and then leave. All those who care about the green belt and the English countryside are its custodians, and it is for the benefit of all. Some of us live here; but some others enjoy it too who do not live here. Their voice is as valid (I would argue rather more valid) than the voice of developers who wish to make a short term profit and who do not live in this area.

Economic development is important for this area and it is important for the country as a whole. But the economic development does not need to be concentrated in this area, in this borough, and in the Green Belt. Surrey is a county which experience enormous developmental pressures in any event; these do not need to be encouraged. Indeed, encouraging development in this area with any use of public money is specifically discouraged by the EU rules governing State Aid, so that state aid is directed to areas of economic deprivation or need rather than areas of prosperity.

The imperatives concerning sustainability are a UN obligation (Resolution 42/187) which are specifically adopted by the NPPF (NPPF 5) and therefore represent an element of English law. This defines “*sustainable development as meeting the needs [not desires, but needs] of the present without compromising the ability of future generations to meet their own needs*”. Use of agricultural land is arguably a vital requirement of future generations that will need to feed itself in an era of climate change. Woodland represent carbon sinks and carbon capture mechanisms which are rather more effective than any yet designed in a lab. There is a need for areas which provide recreation and leisure, and the AONB, with the same status as a National Park, can provide this for future generations, in an area that has maintained sustainable development in this form for a thousand years.

The UK Sustainable Development Strategy Securing the Future (also incorporated in NPPF 5) notes that there are five guiding principles of sustainable development. These should be incorporated as overriding principles into the Local Plan (NPPF 6 notes that – as a gloss to NPPF the purpose of the planning system is to contribute to the achievement of sustainable development). These are five overriding principles are:

- Living within the planet’s environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly.

Qu 39

Do you think there are other issues we should be looking at as part of the Local Plan Development Control Policies Document?

This flags a series of issues.

Development control policies should ensure that development is sustainable, targeted and in the public interest. Unsustainable or uncontrolled development is unlikely to be in the public interest.

Locally designated landscape, wildlife or geodiversity sites are of enormous importance and these need to be protected and conserved.

Tourism is more likely to be promoted by encouraging visitors (and film crews) to our beautiful areas than by promoting urbanisation, signage clutter, tarmacked footpaths, or giving permission to build on these areas for hotels or other tourist facilities. This needs to be recognized.

The **importance of the environment** has not been listed as an issue, and this should be covered.

An issue that should be covered is **leisure use of open spaces** (this includes cycling in Surrey, open spaces often used by ramblers or cyclists such as the Hurtwood or Newlands Corner or Silent Pool) so that these are protected and conserved, as well as being available for this use.

Protection of the countryside, especially AONB but all Green Belt is a matter that should be considered in the context of development control issues and this is not currently listed.

The UK Sustainable Development Strategy Securing the Future (also incorporated in NPPF 5) notes that there are **five guiding principles of sustainable development**. These should be incorporated as overriding principles into the Local Plan and they should override all other development control policies and provide a gloss to them (NPPF 6 notes that – as a gloss to NPPF the purpose of the planning system is to contribute to the achievement of sustainable development).

These are five overriding principles are:

- Living within the planet’s environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly.

Qu 39

Do you have any comments on the delivery information, including the future work to develop our CIL?

10.6 notes that **one way to demonstrate delivery is to show that enough land is available to demonstrate the amount of development we need.**

This cannot be demonstrated without first determining the amount of development that we *do* need, in a public consultation process. Housing is being discussed in this document without any assessment of actual housing *need*, with the intention to earmark hundreds of hectares of green fields as potential development land. Once earmarked in the plan, the land will have a presumption in favour of development, irrespective of actual need at the time. It is therefore imperative that the land

earmarked is minimized to the lowest level reasonable for future development in order to constrain unsustainable development in the future.

No land should be earmarked without first demonstrating that this is required, by a formal process. Previous housing studies have inflated the numbers required by inappropriate questions (eg 1999 study: *"If any [new and as yet non-resident] households hope to move to somewhere in the Guildford RURAL area, please write in below the name(s) of the villages/area(s) they are interested in:..."?*). This is not acceptable, and will be held to account by public scrutiny. This is not a demonstration of need. Questions in any study used will therefore have to be subjected to scrutiny since it is demonstrable that historical data have been distorted in this matter.

In this context, it is important to recognize that there are very strong feelings throughout the borough concerning damage to the AONB and to the Green Belt. Councillors are responsible for controlling the council, and councillors are subject to election.

GBC have noted that there are national political pressures in relation to possible development. However, the public perception is that these have been warmly welcomed by GBC which appears to have a very strong pro-development agenda, and does not appear to recognize the specific circumstances which pertain in the borough.

In this context NPPF 196 notes that the planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan.

The presumption in favour of development is for sustainable development only (NPPF 197), and unsustainable development is by implication excluded.

NPPF 200 notes that Article 4 directions can be used to remove national permitted development rights where it is necessary to protect local amenity or the well being of the area. NPPF 198 notes that where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted.

Qu 41. Do you have any other comments or suggestions you wish to make on matters not covered by other questions [presumably IN has been omitted by poor drafting] this consultation?

Yes.

The residents of Guildford do not want to take a flexible approach to the loss of any open space, especially not green belt and emphatically not AONB.

Councillors must take account of the views of the residents, and not ride roughshod over those wishes as currently appears to be their stated intention (Guildford Dragon; comments by Councillor Monika Juneja). This is the requirement of the NPPF.

Furthermore, the emphasis of the NPPF is that it is the LOCAL PEOPLE who are important here; the councils are acting as their agents and are accountable to them, and this is enshrined in the planning system within the NPPF as well as being clearly the case on an electoral basis. Councillors are responsible to the electorate and the planning department are employed on their behalf through the Council. Both can and should be removed if the wishes of the people are disregarded.

In this context the intention of the Council to use software to eliminate duplicated responses from different individuals should be challenged. I understand that Carol Humphrey, Head of Planning, has stated that responses which are identical will be counted as a single response. This is putting complications in the way of the democratic process, which is supposed to be simple and straightforward, and has been overcomplicated.

As has been noted previously (Qu 1, incorporated here by reference, and many other questions above) the questions within the plan, many of its statements and many of the comments demonstrate a lack of care, a shoddy disregard for precision (see the ungrammatical and nonsensical form of question 41 above – yet more poor drafting) and a lack of completeness. The information set

out for discussion in Appendix B cannot be, per Qu 1, “agreed” with because it has a number of inherent contradictions within it. However, this plan has been produced professionally, over a period of years, by a planning department who have been paid to put it together, under the aegis of local councilors who receive benefits and status from their position. In terms of the consultation process the general public – who in most cases feel very strongly – are debarred from copying text from each other in order to express a view cogently and quickly. Of course no one can submit a response for anyone else – but why should one person not borrow the phrases of another when they agree? Why is this not legitimate, when the consultation process is demonstrably flawed, biased, and is not conducted with proper care or respect for the respondents that – legally – it is required to represent?

If there were a proper process, then all responses should be counted, in terms of the number of respondents canvassed. Responses on form letters, if submitted by different individuals, should all count – they have taken the trouble to reply, to post a letter, and to use another’s words, after all. Within this process, it is as if each voter had to comment in detail on the content of a party’s manifesto, and that without such comment the manifesto would be passed into law without any option. This is an extraordinary democratic deficit, and it cannot be allowed to stand.

In this context, the Town and Country Planning Act 1990 is relevant, specifically S33.2. *“The authority shall consider any representations made to them within the prescribed period.”* A representation is a letter or response from a member of the public, and the fact that it is similar to another letter should not invalidate it as a representation. A vote is of its essence identical to any other vote. Similar responses should not be discounted, as a matter of law. The people of Guildford require you to take all responses into account, and if you consider that they are duplicates, then you must at least by due process appraise them properly to determine this. No responses should be destroyed so that those that you discount or disregard may be subsequently a matter of audit in an appeals procedure.

For the information of the subsequent planning inspection process, this document has been drafted on behalf of a Residents’ Association (Burrows Cross Area Residents’ Association). There are 85 adult members at the last count, including resident adult children (ie this is the number of members of the local electorate within the association). The members pay voluntarily to be members of the association. All members have read this document, and have had the opportunity to comment and to vary the wording. This should therefore have the force of 85 potential respondents, but I understand that the process means that this reply will count as one response. I would question whether this is fair, and whether this response should not have the right of consultation that is given to parish councils.

I have submitted this questionnaire on the terms of reference within the plan. However, I question those terms of reference, as fundamentally flawed.

- The plan has not been properly prepared under the requirements of the legislation.
- The information on which the plan is produced is not publicly available
- The electorate of GBC have NOT been properly consulted
- The electorate of GBC are not given a fair chance to respond
- The planning department have stated that they will be selective in determining which responses to consider. It is reported that they have stated that “duplicate” responses or petitions “will go in the bin”.
- This consultation process is for appearance only; there is a stated intention on the part of both councilors and the planning department to disregard its outcomes if not as desired

It should be noted that the GBC corporate plan was issued after the consultation process had started. There is no reference in the consultation documentation to the GBC corporate plan (which can now, after a request to the Leader of the council on 20 November 2013, be seen on the GBC website – see <http://www.guildford.gov.uk/corporateplan> and <http://www.guildford.gov.uk/CHttpHandler.ashx?id=15695&p=0>)

I was unable to find this document on the website on 20 November 2013. I have therefore requested

the Leader of the council and the two councilors in my borough to request an extension of the consultation period so that this document can also be considered as part of the process.

The Green Belt is too important – nationally, internationally, for all the people of this country and for the planet – to be abused in order to further the short term political or economic interests of local councillors or those who wish to make a short term profit from development, even if this is dressed up as “sustainable” by an arbitrary definition.

No development should take place in the Green Belt outside existing settlement boundaries or on anything other than brownfield sites. NO new development should be sited in the AONB.

Open spaces matter. They need to be defended.