

From
DOUGLAS FRENCH

REPRESENTATION IN RESPECT OF PLANNING INSPECTOR'S MATTERS AND ISSUES RELATING TO GUILDFORD BOROUGH LOCAL PLAN

The points which follow are supplementary to my objection to the Local Plan Consultation sent to GBC on 23 July 2017 which please also see because it provides much more detail. A copy is attached for convenience. The numbering below relates to the issues listed in ID/3.

9.2 The Spatial Location of Housing and Infrastructure Constraints

The spatial distribution of the proposed housing is unsound. All the main sites are located within too small an area of the borough. This heavy concentration between Junction 10 of the M25 and Guildford town is not necessary and will produce consequential adverse pressures on infrastructure which could be avoided with a wider geographical distribution of housing.

In particular the sites at Garlick's Arch, Blackwell Farm, Gosden Hill, Burnt Common and Wisley Airfield will all contribute to pressure on transport infrastructure in Send. Because of the magnet effect of Woking Station the use of the A247 Send Road will increase disproportionately. It is already heavily congested and cannot take more. More evenly distributed housing throughout the borough would avoid this becoming a very serious and insoluble problem in the future.

It is deeply regrettable to have to observe that there appears to be a correlation between the proposed location of new housing developments and the political representation of the wards where they are most concentrated or will be most seriously affected by them. For example, neither Send nor Ripley are represented by councillors from the majority party on the Council.

9.3 Proposed New Business Locations

The proposed new business locations do not take adequately into account infrastructure provision and constraints. For example the expansion of Send Business Centre is proposed without any reference to access constraints. There are three roads leading to Send Business Centre. Two of them (Tannery Lane east end and Papercourt Lane) are impractically narrow and cannot be widened for the reasons stated in my 2017 objection. The third, Tannery Lane, west end,

has an already dangerous junction with the A247 Send Road which also defies alteration to make it suitable for increased commercial and industrial traffic. In neither case is there a solution. It is therefore unsound to propose an extension to Send Business Centre, particularly when there are several other places in the borough which can accommodate increased business facilities without causing such problems.

9.5 Green Belt Release

No, the locations of proposed Green Belt land release are not justified. Unless and until the NPPF is changed the constraints imposed by the Green Belt do have to be heeded. As part of “exceptional circumstances” the Court of Appeal has said that it has to be demonstrated crucially that “the harm to the community at large” by taking Green Belt land for housing would be less than if it were not taken. In objectively assessing housing need there is a requirement to take into account the prevailing policy restraints of which harm to the Green Belt is one. By failing to acknowledge this the plan is unsound. This point is set out in greater detail in my submission of 23 July 2017 at para 2.1 to 2.5.

9.6 Insetting Villages

Removing so many villages from the Green Belt will change their character in an unwelcome and irreversible way. As an example, Send would be particularly badly affected because it has such beautiful open countryside immediately behind an undistinguished main road. To take it out of the Green Belt would result in the steady destruction of the characteristics which make it so attractive to the many people who visit it for recreational purposes, as well as those who live there. It would soon result in Send merging with Woking, so defeating the purpose of the Green Belt altogether.

9.9 New Green Belt Proposals

It would be more appropriate for new Green Belt designations to be found in those parts of the borough which are losing Green Belt sites, not at the other end of the borough. It is difficult to escape the conclusion that political influences are present here.

10.2 Heritage Assets

One important heritage asset is the Wey Navigation and in particular the stretch between Cartbridge and Papercourt Lock which the National Trust has previously identified as a conservation area under threat. The plan is not sound in that an extension to Send Business Park will further damage this beautiful part of the Wey Navigation as well as harming the openness of the Green Belt.

Sites

11.34 A43 Garlick's Arch

There are no exceptional circumstances to justify the release of this land from the Green Belt. The substantial reasons for not doing so are set out at para 5.1 to 5.11 of my submission of 23 July 2017.

11.34 A58 Burnt Common

There are no exceptional circumstances to justify the release of this land from the Green Belt. The substantial reasons for not doing so are set out in my submission of 23 July 2017 at paras 6.1 to 6.4

11.37 A43a Slip Road

The proposed new slip roads would seriously exacerbate traffic volume, noise and air pollution through Send. Please see para 7.3 of my submission of 23 July 2017.

Additional Points

Clockbarn

It is noted that no mention is made in the schedule of the Clockbarn site. I believe there are very significant objections which should be considered and are set out in my submission of 23 July 2017 at para 3.1 to 3.7.

Flooding

Both Send Business Park and Clockbarn are affected by flooding in Tannery Lane which should not be ignored. Details are set out in my submission dated 27 July 2017 at para 4.1 to 4.4.

Douglas French
9 May 2018