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REP-10705377 Elizabeth Carr
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Mr Chris Banks
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Dear Mr Banks

I am writing to you to respond to the Matters and Issues for Examination raised by Mr Jonathan Bore regarding the Guildford Borough Local Plan. I understand that I am entitled to do so as I made a representation during the initial public consultation.

Please will you pass my responses as follows to Mr Bore:

Question 9.4 Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored? (See also Item 5 of my initial questions.)

I do not believe that the right balance between the use of urban and previously developed land and urban extensions has been achieved in Guildford's Local Plan.

Having reviewed the list of 53 sites in Guildford Borough Council's Brownfield Register, 42% of these do not currently have planning applications against them, yet do not feature in the Guildford Local Plan. Some notable sites we believe should be leveraged to build new homes, rather than Policy A22 land north of Keens Lane, include:

- HM Prison Send, Ripley Road, Send (which has a minimum net dwelling of 150)
- Builders Yard (Elms Garden), Glaziers Lane, Normandy
- Former Tyrrell site, Long Reach, Ockham
- Land off Easington Place, Guildford

The exclusion of 42% of Guildford Borough Council's identified brownfield sites proves that the right balance has not been met and contradicts sections 84 and 111 of the National Planning Policy Framework, as well as the comments made by Teresa May on 20th December 2017 - "In our housing white paper we were very clear that this means when they [councils] have examined fully all other reasonable options for meeting identifying development needs. Of course that includes looking at brownfield sites and building on brownfield sites."

Although not on the Brownfield Register, I also believe that the former site used by 'Puttocks' for their Mercedes dealership next to the allotments near St Joseph's Primary School is a viable alternative option. This land was used for a period of years by the Royal Surrey hospital for staff car-parking but is now in a neglected condition and fenced off in an unsightly and unattractive condition. The site would appear to have potential as a site for development in a built-up area.

These points demonstrate that the potential for further residential development in the urban area have not been adequately explored in the Guildford Borough Local Plan.

Question 11.4 What traffic and access issues arise in respect of the site and what measures are proposed in relation to them?

Currently there are 181 properties (including 12 flats) registered on Keens Lane and in the side roads including Keens Park Road, Morgan Close, Findlay Drive and Sime Close etc. The proposed A22 policy development would therefore double the number of dwellings, and subsequently traffic, in the area.

Due to the narrow nature of the lane, it seems clear that Keens Lane would need to be widened in places. This will cause the following traffic and access issue and we do not believe any measures have been suggested to address them:

- Change the nature of Keens Lane and lead to it (and Gravetts and Tangley Lanes) being used as a main road / rat run between the A323 and A322. This will also increase the speed of cars and danger to pedestrians (including many school children) and horse riders.
- Generate additional traffic on Keens Lane, Gravetts Lane and Tangley Lane, as well as traffic exiting onto the A323 and A322. Both A roads are already at a standstill during rush hour and there is a safety concern relating to the achievable visibility from the Gravetts Lane junction with the A323, the Keens Lane junction with the A322 and the Tangley Lane junction with the A322.
- Increase the levels of nitrogen dioxide locally - this will reduce air quality, which according to Public Health England, is the largest environmental risk to public health in the UK. In addition there is the detrimental impact of NO2 to wildlife.

I am also concerned about the traffic report commissioned by Worplesdon Parish Council, because we believe the findings are misleading due to a miss-classification of Keens Lane by the authors RGP. This can be seen in section 2.9 of the report, which states:

To determine the capacity of the roads within the study area, the Design Manual for Roads and Bridges (DMRB) TA79/99 'Traffic Capacity of Urban Roads' has been consulted. The DMRB is mainly for use on more strategic roads, however some adjustments can be made to provide context to the traffic flow figures presented later in this Section. The smallest definition of road type is a UAP4 which corresponds with a 'busy high street predominantly carrying local traffic with frontage activity including loading and unloading'. Whilst none of these roads are a busy high street, the roads still have loading and unloading on street, unrestricted parking, access to houses/driveways and are generally subject to a speed limit of 30mph. It could even be argued that the narrow nature of the road is such that it replicates the stop/start nature of a high street in negotiating oncoming vehicles.

As Keens Lane has been classified as a 'busy high street' because no smaller classification is available, the comments found in section 5.9, stating a development would only cause the road to be operating at 33% of capacity, are clearly incorrect and should therefore be disregarded.

In addition, A323 and A322 traffic issues have been cited as factors in the rulings in the following cases. These issues seem to have been ignored and no measures have been proposed to address them in the Guildford Borough Local Plan. It therefore seems logical that development on this site should therefore be rejected on the same grounds:

- 1976 proposed Liddington Hall development where the inspector recommended 'The proposed development, in my opinion, would further impact the efficiency of both the A323 and A322 which, as principal road connecting Guildford to the M3 and the major growth area, must be safeguarded.'

- In 1983 the County Engineer wrote to the then MP on the Surrey Structure Plan – ‘Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic south of Liddington Hall.’
- 1985 proposed Liddington Hall development where the inspector recommended ‘In my judgement, the discharge to A322/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilesouse, Stoughton and from general growth of traffic would add unacceptable to prevailing congestion and danger on the main framework roads.’
- In 2003 the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated ‘The findings this far suggest that the transport impacts associated with the North West community [the Liddington Hall site] would be significant and difficult to resolve.’

Question 11.5 How is it intended to deal with the proximity to the SPA? What are the exceptional circumstances at a local level that justify the removal of this site from the Green Belt?

I do not believe that the exceptional circumstances needed to justify the removal of this site from the green belt exist, due to the harm it will inflict on wildlife, as per section 88 of the NPF.

A wildlife observation of the site (in particular the hedgerow that runs alongside the north edge of Keens Lane bordering the road side and the field) has been undertaken by a local resident on six separate occasions between 24/02/18 and 04/03/18. The following objections have been based on these, other observations from local residents and in consultation with the Surrey Wildlife Trust and the Surrey Branch of the Campaign to Protect Rural England (CPRE). They prove that exception circumstances are not justified for this site:

- The current hedgerow should be protected as ‘an important hedgerow’ under The Hedgerows Regulation Act 1997 due to sightings of the following within it:
 - o Blackbird, Wood Pigeon, Crow, Blue Tit, Great Tit, Long Tailed Tit, Jackdaw, Magpie, Dunnock, Goldfinch, Robin, Collared Dove, Starling, House Sparrow, Song Thrush, Redwing and Cuckoo. The latter four species are all identified by the RSPB as Red Status meaning that these species are the highest conservation priority, needing urgent action - <https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/uk-conservation-status-explained/>. The RSPB have outlined the importance in hedgerows to birds in a recent communication stating - ‘Hedges may support up to 80 per cent of our woodland birds, 50 per cent of our mammals and 30 per cent of our butterflies. The ditches and banks associated with hedgerows provide habitat for frogs, toads, newts and reptiles.’
 - o Previous observations by local ornithologists have also identified summer migrants such as Chiff Chaff’s and, in 2016, Nightingale in this hedgerow.
 - o There is also evidence of a significant number of nests within the hedgerow (at various heights) suggesting this is also an important nesting area for some species.
- There is a bat population residing in the derelict buildings on the proposed site, which should not be disturbed and are protected by law under the 1994 Habitat Regulations. Owls have been sighted roosting in these barns, which should be protected under schedule one of the 1981 Wildlife and Countryside Act, as should the barn owls that nest annually in Tanglely stables directly opposite the proposed site. We also understand that there is a badger set on the land, which is protected under the Protection of Badgers Act 1992.
- Other wildlife protected by law are present on land adjacent to, or in very close proximity of the site, giving additional reasons why the land should remain as green belt:
 - o 1981 Wildlife and Countryside Act, under schedule five the water voles that have been recorded on Pitch Place Green should be protected.
 - o Schedule 2 of the Conservation of Habitats and Species Regulations 2010 and Schedule 5 of the Wildlife and Countryside Act 1981 protects Great Crested Newts – we understand their DNA has been found on the site and know they have been found and photographed on either side of the site.

- In addition, parts of the site are within the 400m exclusion zone of the Thames Basin Health SPA, for which there is a presumption against net new residential development as outlined in the TBH SPA Avoidance Strategy 2017 Supplementary Planning Document.

As a result of these points, I believe that the loss of the site's fields, mature hedgerows and trees due to any new entrances, road widening or infrastructure improvement, as well as the build itself, will result in decimation of the habitat for wildlife and certainly demonstrates that the development is inappropriate and will cause harm, as per section 88 of the National Policy Planning Framework.

In addition, I do not believe exceptional circumstances exist for building on green belt as all other avenues, such as building on Brownfield sites, have not been exhausted (see comments on Question 9.4) – a requirement mentioned by Teresa May in relation to the Guildford Local Plan, in Prime Minister's Questions on 20th December 2017.

Yours sincerely

Jonathan White