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## Lovelace Neighbourhood Plan representations

Comment ID	Organisation	Comment
LNP19/10		<p>I endorse the plans proposed by the Lovelace Neighbourhood Plan over and above GBC plans. I believe that is essential that any plans does possible to protect the village status. This includes maintaining the ability for local businesses to thrive and not become bypassed as traffic struggles to through the villages. The LNP makes improved consideration for local infrastructure such as transport links and seeks to minimise the disruption and pollution of extra traffic. Crucially the plan is proportionate to the area and challenges large developments that would be detrimental to the greenbelt.</p>
LNP19/11	Ripley Parish Council	<p>I wholeheartedly support the Lovelace Neighbourhood Plan and all the work that has been done by residents to enhance our villages for future generations</p>
LNP19/12		<p>This plan gives specific local focus on development with clear direction on important issues such as parking, pollution, traffic movement and land use. It is to be congratulated on dealing with the serious lack of residential parking in the community of Ripley and its attempts to future proof new developments. The protection of local green spaces is to be supported.</p> <p>The recognition of appropriate levels of concentration of buildings and design criteria is supported along with the settlement boundaries that protect the rural nature of the ward.</p> <p>The thread of limited and proportional growth with a focus on the important need for affordable housing is to be applauded.</p>
LNP19/13		<p>The infrastructure requirements MUST be better defined for the large scale sites so as to guarantee (or at least try) to make them as sustainable as possible. Ripley and Ockham barely have enough facilities as it is</p>

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		<p>and would struggle to cater for the bigger developments (Wisley and Garlicks Arch) as well.</p> <p>The following should be defined per 500 homes:</p> <ul style="list-style-type: none"> <li>- The number fo shops</li> <li>- The number of public houses or public meeting places</li> <li>- Recreational grounds</li> <li>- Community Halls</li> <li>- Doctors' Surgeries</li> <li>- Restaurants of Cafes</li> <li>- etc.</li> </ul> <p>Should any of the above fail, as they may well do, then that is natural evolution but they must be given a chance to at least start through offering the first 5 years operation at greatly (to be defined) reduced rent etc.</p> <p>If a devloper wishes to waive these requirements then a significant contribution ( S106 Lux if you like) must be demanded from them to improve or increrase these services nearby.</p> <p>These developments shouldn't be only dormitory estates for the Villages and Town Centre, they musty be built as distinct communities in their own right.</p> <p>All this infrastructure must be planned and space allowed for in the first phase of any development. If they can be provided as well then so much the better</p>
LNP19/14		<p>I am concerned about the already extremely congested Ripley and what effect the planning applications at wisley and Garlicks arch would have on this area as the village is already at a standstill at peak times and cannot support extra traffic . Access needs to be created on to A3south at Ockham roundabout .</p>

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		<p>In addition as is always the case no consideration seems to have been made for the already oversubscribed Doctors surgeries and schools .</p>
LNP19/15		<p>I am concerned with the amount of traffic flowing through small villages such as Ripley, horsley and Ockham. We have fast flowing traffic running through the village at all times of the day and night with no speed restrictions. Any large building projects will increase traffic and pollution.</p> <p>Local people should be allowed a say on any changes which affect the commuting to work, overcrowding at local schools and go surgery's.</p>
LNP19/16		<p><b><u>LOVELACE NEIGHBOURHOOD PLAN</u></b></p> <p>Dear Sir / Madam,</p> <p>I support the Lovelace Neighbourhood Plan (LNP) as it has been developed by local residents for local residents.</p> <p>The LNP proposes to provide housing for local needs rather than 20-25% of Guildford Borough's needs. This approach emphasises the need for housing development to be proportionate to its surroundings, as opposed to very large developments. This approach will minimise the potentially severe increases in traffic and pollution on the local roads and the protection of environmentally sensitive designated green spaces.</p> <p>Overdevelopment of the Lovelace neighbourhood is extremely harmful to the rural nature of the surrounding</p>

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		<p>villages of Ripley, Wisley and Ockham and will cause coalescence of these villages. A significant increase in housing numbers will have a detrimental impact on the already highly congested local rural road network around and within Ripley.</p> <p>[Attachment deleted as it contained personal information, text from attachment is reproduced above]</p>
LNP19/17		<p>I support the following:</p> <p>Lovelace provide housing for local needs rather than 20 - 25% of the Boroughs needs</p> <p>Housing development be proportionate to its surroundings rather than very large developments</p> <p>Measures to control potentially severe increases in traffic and pollution on the local roads</p> <p>The need to have good public transport to the Woking and Guildford towns, stations and amenities</p> <p>The protection of environmentally sensitive designated green spaces</p>
LNP19/18		<p>I support the LNP proposing the following:</p> <ul style="list-style-type: none"> <li>• That Lovelace provide housing for local needs rather than 20-25% of the Borough's needs.</li> <li>• That housing development be proportionate to the surroundings rather than very large developments.</li> </ul>

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		<ul style="list-style-type: none"> <li>• That measures to control potentially severe increases in traffic and pollution on the local roads should be put in place - Ripely, for example, already has a very high amount of traffic, particularly on the high street during rush hours, and adding to this will cause further pollution in an already polluted environment.</li> <li>• There needs to be a good infrastructure with enough schools, doctors surgeries, etc, to support any increase in housing.</li> <li>• We need to have good public transport to Woking and Guildford towns and stations.</li> <li>• There needs to be the protection of environmentally sensitive designated green spaces.</li> </ul>
LNP19/19		<p>I support the Lovelace Neighbourhood Plan because it has been developed by local residents for local residents.</p> <p>The LNP proposes to provide housing for local needs rather than for 20-25% of Guildford Borough's needs and this means housing development will be proportionate to its surrounding. This will also minimise potentially severe increases in traffic and pollution, and it will go towards protecting environmentally sensitive designated green spaces.</p> <p>Overdevelopment of the Lovelace neighbourhood would be extremely harmful to the rural nature of Ripley, Wisley and Ockham and will cause coalescence of these villages. The roads around Ripley are already highly congested and we do not want to add to this existing problem.</p>
LNP19/2	East Horsley Parish Council	<p><b>Lovelace Neighbourhood Plan Consultation</b></p> <p>East Horsley Parish Council has no objections to the Lovelace Neighbourhood Plan. We believe the Lovelace Neighbourhood Plan sets out a comprehensive and well-justified set of planning policies which respond clearly to the difficult challenges facing this area. We commend the team responsible for preparing this plan and would like to wish them a successful outcome.</p> <p>Nick Clemens EHPC Clerk</p>

Comment ID	Organisation	Comment
LNP19/20		I agree with accepting this local plan
LNP19/21		<p>I would like to support the implementation of the Lovelace Neighbourhood Plan.</p> <p>I agree with accepting the plan.</p>
LNP19/22		<p>As a Lovelace resident, I fully support the LNP, especially where it proposes:</p> <ul style="list-style-type: none"> <li>• Lovelace provide housing for local needs rather than 20-25% of the Borough's needs</li> <li>• That housing development be proportionate to its surroundings rather than very large developments</li> <li>• measures to control potentially severe increases in traffic and pollution on the local roads</li> <li>• the need to have good public transport to Woking and Guildford towns and stations</li> <li>• the protection of environmentally sensitive designated green spaces</li> </ul>
LNP19/23		<p>I would like to comment as follows:</p> <ul style="list-style-type: none"> <li>• I think that the Lovelace community should only provide housing for local needs rather than a have significant proportion of the Borough's needs built in this area,</li> <li>• Any housing development must be proportionate to its surroundings ; we don't want to have huge isolated developments,</li> <li>• In this respect it is very important that we take the protection of environmentally sensitive designated green spaces seriously and not allow development therein. Where unauthorised development has taken place (eg Valentines Farm) enforcement notices should be served in a timely fashion,</li> </ul>

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		<ul style="list-style-type: none"> <li>• We need to take measures to control the current levels of traffic and pollution on our local roads; in this regard we must have better public transport links,</li> <li>• We have to try to reduce the potentially huge increases in traffic and the resultant congestion (from planned development) by having a "joined up" policy re local public transport, in particular good bus service to / from Woking and Guildford towns and stations.</li> </ul>
LNP19/24		<p>I support the Lovelace Neighbourhood Plan in proposing:</p> <p>Lovelace should be providing housing for local needs rather than 20-25% of the borough's needs.</p> <p>Housing development be proportionate to its surroundings rather than very large</p> <p>Measures to control potentially severe increases in traffic and pollution on the local roads.</p> <p>The need to have good public transport to Woking and Guildford towns and stations.</p> <p>the protection of environmentally sensitive designated green spaces.</p>
LNP19/25		<p>Any housing development should be proportionate to its surroundings rather than very large developments. Ockham village only has just over 100 houses in the whole village, so to add a huge development would absolutely destroy our beautiful, historic village. The protection of environmentally sensitive designated green spaces is paramount, and has always been protected by all governments. Our small area should not be housing 20-25% of the Borough's needs. It would be devastating for our whole community and with very little space at any railway station, is not feasible to put large numbers of people in our villages. We all chose to live in a village and do not want to live in a town!</p>

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LNP19/26		<p>I strongly oppose the amount of housing proposed under this plan, and question the numbers claimed to be required for local needs. The impact of the developments proposed will destroy our local green spaces and compromise the remaining small pockets of natural diversity for wildlife. In my own village (Ripley) the roads are presently clogged with the huge amount of vehicles passing through. These numbers are set to vastly increase leading to slow-moving, congested traffic and the associated rise in pollution levels (already dangerously high) from the stationary exhaust fumes.</p> <p>The local infrastructure, already burgeoning, cannot support the increased numbers attending the health centre or schools (the school in my village has closed). Furthermore there is not adequate transport links to the immediate towns of Guildford and Woking to accommodate the additional influx, forcing more and more vehicles onto the already choked roads.</p> <p>The proposed Local Plan housing numbers attempt to satisfy projected housing needs, but they fail to take into account individual local needs and sustainability. The huge numbers considered for small areas compromise the health of residents, destroy the remaining green, natural pockets and overwhelm the presently saturated roads and local services.</p>
LNP19/27		<p>I am supportive of this plan and its desire to limit wherever possible the damage which will be done to our community by the proposals for excessive new housing developments in the 2019 GBC Local Plan</p>
LNP19/28		<p>Firstly, I would say people have been contacting me to complain about the difficulty of making comments during this public consultation, as below:</p> <ul style="list-style-type: none"> <li data-bbox="555 1299 2047 1331">• <i>“I think I did more than you were allowed so it chopped off my comment about infrastructure and</i></li> </ul>



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		<p><i>GBC &amp; SCC!"</i></p> <ul style="list-style-type: none"> <li>• <i>"After a very difficult process in trying to register my comments on the LNP, I think I have registered my comments. However, the process was so convoluted that I am not sure it has worked properly !!"</i></li> <li>• <i>"I have tried to add my comments on the online form but keep getting frustrated as am told my email or password (won't tell me which) is incorrect, then blocks any attempt I make to change things! It is a very difficult site to successfully navigate - at least that is what I have found! I'm sure this will be happening to others too."</i></li> </ul> <p>I have been involved with the Lovelace Neighbourhood Plan (LNP) since its inception so am unhappy that the communities face such difficulties in making comments to the Examiner on whether they support the LNP, or not.</p> <p>The LNP was created from numerous public consultations with the communities and the LNP project leaders and steering committee aimed to meet the Basic Conditions and provide an objective Neighbourhood Plan. It fully represents the views of the community and as a long-standing resident, I support those views and the policies in the LNP.</p> <p>I agree that Lovelace should provide housing to meet local housing need together with and a proportion of the borough housing need, but not the disproportionate level of housing proposed by the Local Plan as this will have severe effects on the communities and the area. (Removing the former airfield from the Green Belt and adopting the controversial Local Plan during the election purdah period was disgraceful and the decimation of the Conservative majority just one week later was rough justice for this action).</p> <p>I believe housing development should be located where the road infrastructure, public transport and local facilities are good enough for car usage to be a choice, not a necessity. Anything but small housing developments need an excellent public transport service to the main towns of Woking and Guildford and I fully support the LNP in this requirement, particularly to Woking, which is the main station of choice from Ripley.</p>

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		<p>I agree with the LNP that the proposed 4-way junction at Burnt Common, (to be funded by the former airfield offshore owners), will reduce Send traffic travelling through Ripley. However, this will be offset by the undoubted increase in RHS traffic alone. As a local, I know extra traffic from the Ockham roundabout travelling to the proposed Burnt Common roundabout, or Woking, will severely increase traffic on the local roads and through Ripley village, create further severe congestion and reduce air quality even further. As it is, it can be almost impossible to enter the High Street from side roads during rush hour.</p> <p>I agree with the LNP protecting the natural environment in these times of global warming. Car usage should be reduced where possible, not encouraged, as electric vehicles being the norm is a long way off.</p> <p>I agree with the policies in the LNP safeguarding the area whilst providing housing to meet local need without destroying the area.</p> <p>I believe the referendum area should be extended as neighbouring Send, Pyrford, Clandons and the Horsleys will be severely affected from increased traffic from any large proposed developments in Lovelace.</p> <p>Please keep me informed on the Examiner and Council's decision to adopt or refuse the LNP.</p>
LNP19/29		<p>Having carefully examined this document I can find no reason whatever to justify the destruction of our greenbelt for unnecessarily high density building developments such as those proposed. Ripley school remains closed. Roads are at maximum capacity and cannot take any further increase in volume. Medical facilities are woefully small and will not cope with further patients. Shops are also far too small to cater for the demands of a larger population.</p> <p>Accepting SOME building, preferably infilling is necessary, get the infrastructure and associated facilities sorted first.</p>

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LNP19/3	Highways England	<p>Thank you for inviting Highways England to comment on this Consultation.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and the M25 motorway.</p> <p>We have reviewed this document and supporting evidence and have no comments.</p>
LNP19/30		<p>I object to the local plan proposals</p> <p>The three meadows site (Wisley airfield) is inappropriate for housing development. The site has poor access and will lead to a large volume of local traffic the roads are unable to accommodate . The public transport provision is poor, the roads are narrow and already a congestion cause.</p> <p>This is a rural area and inappropriate for such large scale developments.</p> <p>I pass these objections as a 3 decade resident of the village and a daily user of the footpaths across 3 meadows.</p>
LNP19/31		<p>Regarding the Lovelace Neighbourhood Plan (LNP)  I am in complete 100% agreement with this plan  It provides for housing for local needs rather than 20-25% of the Borough's needs.  Housing development needs to be in proportionate to its surroundings rather than very large developments</p>

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		<p>plonked down willy nilly wherever a space can be found Green field or anywhere else that is easy. It lays out measures to control potentially severe increases in traffic and pollution on the local roads. It addresses the need to have good public transport to Woking and Guildford towns and stations as well as footpaths from Ockham to Ripley and or East Horsley. It provides for protection of environmentally sensitive designated green spaces. It was written and consulted widely in the Lovelace area and represents the fview of the majority of residents.</p>
LNP19/32	Surrey County Council	<p><b>Surrey County Council Response to the Lovelace Neighbourhood Plan</b></p> <p>Thank you for consulting Surrey County Council on the Lovelace Neighbourhood Plan.</p> <p>We previously responded to the Regulation 14 Public Consultation with comments in our letter sent to the Lovelace Neighbourhood Plan Group dated 18 October 2018, attached as an annex to this letter.</p> <p>Since that response, there have been some changes that require an update to our position as presented in our previous letter. We have set out these changes, along with our continuing concerns, under the relevant headings below.</p> <p><b>Minerals and Waste Planning</b></p> <p>It should be noted that of the three waste sites referenced in our previous response, just Jury Farm in Ripley remains as a safeguarded site. Three Acres Yard has ceased operating and the land at the former Wisley Airfield is identified as a new settlement in the Guildford Local Plan: strategy and sites (2015 - 2034). Although neighbourhood plans cannot include policies that cover minerals and waste development, it is important to ensure that any proposed new development does not negatively affect mineral resources or minerals or waste operations. As the minerals and waste planning authority, the county council considers it to be important for these sites to be identified and considered in Neighbourhood plans.</p>

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		<p><b>Routing Arrangements for the Drift Golf Club</b></p> <p>The routing arrangements have been amended in the revised plans for the Drift Golf Club. The route is now via Cobham, rather than via West Clandon and Ockham and is shown in Appendix A of the report submitted by Thomasons to support the planning application. Further details can be provided on request.</p> <p><b>Ripley Local Green Spaces</b></p> <p>Our previously expressed concern about the designation of the former Ripley C of E Primary School playing fields as Local Green Space (LGS) remains an issue for the county council, for the reasons stated in our previous response. Paragraph numbers of the National Planning Policy Framework (NPPF) are changed in the revised in 2019, so that para 99 now states that the Local Green Space (LGS) designation should “be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.” We maintain that a LGS designation for this site could be potentially restrictive to future investment and to the provision of essential community services. The designation does not conform to the guidance in the NPPF as it would not necessarily complement investment in essential services.</p> <p><b>[Annex]</b></p> <p><b>Surrey County Council Response to the Lovelace Neighbourhood Plan</b></p> <p>Thank you for consulting Surrey County Council on the Lovelace Neighbourhood Plan. Our comments are set out below and relate to the county council’s role as the minerals and waste planning authority and the education authority for Surrey.</p> <p><b>Minerals and Waste Planning</b></p>

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		<p>As the minerals planning authority we consider that the two concreting aggregate safeguarding areas located within the Plan area should be identified. This is to ensure that any proposals for development likely to impact on the mineral reserve are fully considered in the context of the Surrey Minerals Plan 2011 Core Strategy (Policy MC6), the National Planning Policy Framework (section 17 paras 203 - 208) and National Planning Policy Guidance (Para 003).</p> <p>We would also seek for the safeguarded waste sites falling within the Plan area to be similarly identified and considered in the preparation of the Lovelace Neighbourhood Plan. These sites comprise:</p> <ul style="list-style-type: none"> <li>? - the Three Acres Yard site at Tythebarns Farm in Ripley;</li> <li>? - Jury Farm in Ripley; and</li> <li>? - land at the former Wisley Airfield in Ockham.</li> </ul> <p>Waste safeguarding is supported by the Surrey Waste Plan 2008 (Policy DC1) and the National Planning Policy for Waste (Para 8). All of our Minerals and Waste safeguarded sites and areas can be viewed, via our website, on our online safeguarding map.</p> <p><b>Routing Arrangements for the Drift Golf Club</b></p> <p>With reference to paragraph 3.4, the site routing arrangement is incorrect as the plans were revised and the route amended and the approved route is via Cobham, and not Clandon, as stated. The revised route is shown in Appendix A of the report submitted by Thomasons to support the planning application. This document is attached to the covering email along with this letter.</p> <p><b>Ripley Local Green Spaces</b></p> <p>With reference to paragraph 4.2.1, we do not consider the proposed designation of the former Ripley C of E Primary School playing fields as Local Green Space (LGS) to be appropriate. Whilst the most recent</p>

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		<p>educational use of the site has ended, the site is being reviewed for alternative statutory education provision.</p> <p>The NPPF (paragraph 99) states that LGS designation should "be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services." Designating the site as LGS could prove to be a restrictive barrier to future investment and provision of essential community services for the local area. The proposed designation is not therefore considered to be in conformity with the NPPF.</p> <p>Furthermore it is our view that former school playing fields do not meet the NPPF criteria as, having been ancillary to the school, they are considered to have served primarily as educational facilities and have never been accessible for public use.</p> <p>We would further point out that playing fields are already protected from inappropriate development by the National Planning Policy Framework (paragraph 97) and additionally, that there is a statutory process under Section 77 of the School Standards and Framework Act (SSFA) to safeguard school playing fields whereby prior consent is needed from the Secretary of State for Education in order to erect buildings on or change the use of playing fields.</p>
LNP19/33		<p>Please, please, no further loss of the Greenbelt. Therefore, all new housing should include infrastructure (i.e. declog the roads, provide schools and another surgery, improved choice of buses). All new housing should be in proportion to the local area and not take vast swathes of the greenbelt (i.e. no building on Wisley airfield/common and Garlick's Arch).</p>
LNP19/34		<p>I moved into Newark Lane in Ripley 3 months ago and love the friendly village with its community spirit and fear that major housing developments will spoil this. One of the reasons it is so charming is the accessibility to the countryside.</p>

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		<p>I drive everyday and getting onto the High Street at peak times is a new skill that I have learned in this past 3 months. Newark Lane is used by large vans as well as cars and the lane is far too narrow for most of these to be using it. The infrastructure is not fit for purpose to absorb these large developments and the village and villagers will suffer for this.</p> <p>There are plenty of brown field sites in the area that should be used before you start building on green belt land.</p>
LNP19/35		<p>I object to this Plan. Far too many proposed houses for a rural area. The impact on roads, traffic, utilities and surgeries and schools. This area is over crowded already. Traffic and pollution. Congestion of roads.</p>
LNP19/36		<p>I broadly support the Lovelace Neighbourhood Plan (LNP). In particular, I support the LNP approach to Housing provision, Environment and Green Belt protection and transport.</p> <p>LNP outlines a sensible approach to <b>LOCAL housing needs</b>, and not taking on a vastly disproportionate level of the borough's <b>wants</b>. It emphasises proportionate, sustainable and genuinely affordable development, rather than very large developments imposed on rural communities <b>against their wishes</b>.</p> <p>LNP also takes a sensible approach to <b>infrastructure</b>, with emphasis on public transport, <b>NOT road traffic expansion</b>, being a key factor in <b>sustainable development</b>. It also supports adequate healthcare, educational and community facilities as key requirements for sustainable development, something obviously absent from the Borough's Local Plan.</p> <p><b>This plan should be adopted and its provisions NOT overridden in the interests of developers and non-local aspirations.</b></p>



Comment ID	Organisation	Comment
LNP19/37		<p>Dear Sir,</p> <p>I am writing to you in support of the Lovelace Neighbourhood Plan.</p> <p>I ride daily to my local place of work on my scooter. I am worried about the amount of traffic and associated pollution, both of which are on the increase. I am pleased that the Lovelace Neighbourhood Plan includes much information about this problem.</p>
LNP19/38		<p>Dear Sir,</p> <p>I am writing to you to support the Lovelace Neighbourhood Plan.</p> <p>I am pleased to note that the plan has made reference to the need to protect environmentally sensitive designated green spaces, and appreciate the hard work put in by those who compiled the plan. They have worked hard to put forward a range of points which will protect and enhance our much loved locality.</p>
LNP19/39	Savilles	<p>Savills on behalf of Wisley Property Investments Ltd.</p> <p>[Comment extracted from PDF is reproduced below - Part 1 of 4]</p> <p><b>1. Abbreviations used in this report</b></p> <p>AONB Area of Outstanding National Beauty</p> <p>DCO Development Consent Order</p>

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Comment ID	Organisation	Comment
		<p>eGLP Emerging Guilford Local Plan</p> <p>GP General Practitioner</p> <p>GBLP Guildford Borough Local Plan</p> <p>HE Highways England</p> <p>LNP Lovelace Neighbourhood Plan</p> <p>NP Neighbourhood Plan</p> <p>NPPF National Planning Policy Framework</p> <p>PPG Planning Practice Guidance</p> <p>RPC Ripley Parish Council</p> <p>SANG Suitable Alternative Natural Greenspace</p>

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Comment ID	Organisation	Comment
		<p>SNCI Site of Nature Conservation Interest</p> <p>SoS Secretary of State</p> <p>SSSI Site of Special Scientific Interest</p> <p>SNCI Site of Nature Conservation Interest</p> <p>SPA Special Protection Area</p> <p>TBHSPA Thames Basin Heaths Special Protection Area</p> <p>WA Wisley Airfield</p> <p>WPIL Wisley Property Investments Limited</p> <p><b>2. Executive Summary</b></p> <p>2.1. The Lovelace Neighbourhood Plan (LNP) cannot proceed to referendum in its present form, as it is not consistent with the adopted Guildford Borough Local Plan (GBLP). Major modifications are required, which in the opinion of Wisley Property Investments Ltd (WPIL) should result in a re-consultation of the Plan.</p>

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		<p>Despite our significant representations at the Regulation 14 stage, the same flaws remain - notably the negative tone, the conflict with the strategic allocations and the lack of positive planning.</p> <p>2.2. Neighbourhood Plans should be in general conformity with the development plan, plan positively to support, and not interfere, with the strategic allocations of the Local Plan. The length and detail of our representations, and our significant concerns that the LNP will undermine Policy A35 at both Regulation 14 and 16 stages, indicates that the policies are not designed to support the allocation at Wisley Airfield (WA).</p> <p>2.3. The LNP includes a significant amount of text which is not considered to be relevant to the LNP or its policies. This should be refined to ensure that the LNP does not include information which is not relevant to the Plan itself. The LNP should be focused on policies to regulate the use of land, and to cause an effect. Background detail can be left to supporting documents.</p> <p>2.4. There is reference to WA as “Three Farms Meadow” (TFM) and a generally negative tone in the LNP in respect of this strategic development which is a key part of the GBLP. As, on adoption, the LNP will form part of the development plan for the area it is not appropriate for such a tone to be adopted within the Plan which should be a positively prepared mechanism to manage change or conservation. ‘TFM’ is not an officially recognised name, and reference to it will simply cause confusion and risk ambiguity.</p> <p>2.5. In respect of the housing and transport policies within the LNP, these are not clear and do not relate to strategic sites allocated by the GBLP. It must be made clear that the majority of the LNP does not (and cannot) affect the strategic designation A35 at the WA.</p> <p>2.6. In respect of some environmental policies within the LNP, a greater appreciation of the evidence base is required - notably the Inspectors comments on the GBLP and the previous WA Appeal.</p> <p>2.7. Policies which give regard to traffic should use the National Planning Policy Framework (NPPF) as an evidence base - that development should only be prevented on highways grounds if there would be a severe impact on the road network - not simply creating an additional level of traffic.</p>

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		<p>2.8. The specific comments and objections made by WPIL are set out below and are in the order which they appear within the emerging LNP. WPIL's strong preference is for inclusion of an overarching policy which makes clear that the LNP is not relevant for Allocation A35 (Wisley New Settlement), a removal of all negative comments regarding the WA allocation. Otherwise, another option is to insert amendment policies and supporting text throughout the plan which makes this clearer. If this does not happen, WPIL outlines that the LNP would not meet the Basic Conditions in terms of general conformity with the GBLP.</p> <p>2.9. WPIL are willing and able to meet GBC and the LNP steering group to discuss these concerns in greater detail.</p> <p><b>3. Introduction &amp; Background</b></p> <p>3.1. This representation as part of the Regulation 16 consultation is made on behalf of Wisley Property Investments Ltd (WPIL). WPIL is the owner and promoter of the Land at Wisley Airfield, which is located within the Lovelace Neighbourhood Plan (LNP) designated area.</p> <p>3.2. Wisley Airfield (WA) is allocated within the adopted Guildford Borough Local Plan (GBLP) as one of the main strategic allocations. Its allocation secures a significant number of homes needed in the borough, and the site makes up the vast majority of the land included within Allocation A35. WPIL are working alongside the landowners of the remaining land at Bridge End Farm and their agents.</p> <p>3.3. Allocation A35 of the GBLP allocates the site for:</p> <ul style="list-style-type: none"> <li>? Approximately 2,000 homes (C3), including some specialist housing and self-build plots;</li> <li>? Approximately 100 sheltered/Extra Care homes (C2 use);</li> <li>? 8 Gypsy and Traveller pitches;</li> <li>? Approximately 1,800 sq m of employment floorspace (B1a);</li> <li>? Approximately 2,500 sq m of employment floorspace (B2/B8);</li> <li>? Approximately 500 sq m of comparison retail (A1);</li> <li>? Approximately 600 sq m of convenience retail (A1);</li> </ul>

Comment ID	Organisation	Comment												
		<p>? Approximately 550 sq m services in a new Local Centre (A2 -A5);            ? Approximately 500 sq m of community uses in a new Local Centre (D1);            ? A primary school (D1) (two form entry); and            ? A secondary school (D1) (four form entry, of which two forms are needed for the housing on the site and two for the wider area).</p> <p>3.4. Notably, the Judicial Review of the GBLP was dismissed by the High Court on 4th December, and as such reference to the 'challenged adopted GBC Local Plan' in the LNP should be revised. 3</p> <p>3.5. The present progress of a planning application on GBLP Allocation 35 is anticipated to be:</p> <table border="1" data-bbox="488 707 2114 1086"> <thead> <tr> <th data-bbox="488 707 1294 762">Task</th> <th data-bbox="1301 707 2114 762">Timescale</th> </tr> </thead> <tbody> <tr> <td data-bbox="488 767 1294 823">EIA Scoping Report</td> <td data-bbox="1301 767 2114 823">Q1 2020</td> </tr> <tr> <td data-bbox="488 828 1294 911">Policy D1 Compliance Public Consultation and design review panel process</td> <td data-bbox="1301 828 2114 911">Q1/Q2 2020</td> </tr> <tr> <td data-bbox="488 916 1294 971">Application Submission</td> <td data-bbox="1301 916 2114 971">Q2/3 2020</td> </tr> <tr> <td data-bbox="488 976 1294 1032">Application Determination (Resolution)</td> <td data-bbox="1301 976 2114 1032">December 2020</td> </tr> <tr> <td data-bbox="488 1037 1294 1086">First Dwellings</td> <td data-bbox="1301 1037 2114 1086">From 2022/23</td> </tr> </tbody> </table> <p>3.6. These timescales have been conveyed to GBC and reflect the GBLP housing trajectory. WPIL is committed to engaging in GBLP policy D1 design/masterplanning process to guide the proposed planning submission including public consultation.</p>	Task	Timescale	EIA Scoping Report	Q1 2020	Policy D1 Compliance Public Consultation and design review panel process	Q1/Q2 2020	Application Submission	Q2/3 2020	Application Determination (Resolution)	December 2020	First Dwellings	From 2022/23
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Comment ID	Organisation	Comment
		<p>3.7. A Neighbourhood Plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (PPG 41-004-20190509). It should be positively prepared, support local needs yet not undermine those strategic policies set out in the GBLP (NPPF, Paragraph 29).</p> <p>3.8. WPIL previously submitted representations to the Regulation 14 Consultation in November 2018, and the planning landscape has significantly changed since this consultation was undertaken. The 2019 Guildford Local Plan was formally adopted by the Secretary of State (SoS) on the 25th April 2019, confirming the strategic allocations including Policy A35 which concerns Wisley Airfield (WA). Furthermore, the new 2019 NPPF was also implemented by Government.</p> <p>3.9. In our previous representation, WPIL raised key concerns regarding the plan not being consistent with emerging Local Policy, which was at the time at a significantly advanced stage. We further detailed that the Regulation 14 Neighbourhood Plan contained text which was irrelevant to the LNP and its policies and was written in a negative tone, contrary to Allocation A35.</p> <p>3.10. Plans should make explicit which policies are strategic policies and non-strategic policies, as a neighbourhood plan must be in general conformity with the strategic policies of the development plan if it is to meet the Basic Conditions and be found sound.</p> <p>3.11. This representation will outline our representations to the LNP and our concerns with the submitted Neighbourhood Plan, and how the currently drafted the LNP does not meet the Basic Conditions.</p> <p><b>4. Policy &amp; Guidance for Neighbourhood Plans</b></p> <p><b><u>Town and Country Planning Act 1990 (As Amended)</u></b></p> <p>4.1. Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (As Amended) sets out the basic conditions which must be met by a Neighbourhood Plan. The Basic Conditions are:</p>

Comment ID	Organisation	Comment
		<p>a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</p> <p>b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</p> <p>c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders. The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</p> <p>d) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>e) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>f) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p> <p><b>Revised National Planning Policy Framework (2019)</b></p> <p>4.2. In February 2019, the Government published a revised National Planning Policy Framework (NPPF). Whilst the previous consultation was to be formulated on the previous, 2018 version, the Regulation 16 NPPF is to be judged on the updated 2019 version.</p> <p>4.3. For the drafting of Neighbourhood Plans, the NPPF sets out key requirements which have to be met in order for the plan to be written in accordance with planning guidelines and to be found sound. Relevant policies of the NPPF (2019) include:</p> <ul style="list-style-type: none"> <li>• Paragraph 13 - <i>“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”.</i></li> <li>• Footnote 16 - <i>“Neighbourhood Plans must be in general conformity with the strategic policies</i></li> </ul>



Comment ID	Organisation	Comment
		<p>contained in any development plan that covers their area.”</p> <ul style="list-style-type: none"> <li>• ? Paragraph 18 – “Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.”</li> <li>• Paragraph 21 – “Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.”</li> <li>• Paragraph 29 – “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”</li> <li>• Paragraph 37 – “Neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.”</li> <li>• Paragraph 125 – “Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.”?</li> <li>• Paragraph 136 – “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including</li> </ul>

Comment ID	Organisation	Comment
		<p data-bbox="591 325 913 357"><i>neighbourhood plans.</i></p> <p data-bbox="483 392 1012 424"><b><u>Planning Policy Guidance (PPG)</u></b></p> <p data-bbox="483 459 2107 491">4.4. The PPG includes a large amount of guidance in respect of preparing a Neighbourhood Plan including: ?</p> <ul data-bbox="555 528 2107 1342" style="list-style-type: none"> <li data-bbox="555 528 2107 807">• Paragraph: 009 Reference ID: 41-009-20160211 - <i>“Draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan, the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.”</i></li> <li data-bbox="555 810 2107 1023">• Paragraph: 009 Reference ID: 41-009-20160211 - <i>“The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan.”</i></li> <li data-bbox="555 1026 2107 1198">• Paragraph: 040 Reference ID: 41-040-20160211 - <i>“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.”</i></li> <li data-bbox="555 1201 2107 1302">• Paragraph: 040 Reference ID: 41-040-20160211 - <i>“Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.”</i></li> <li data-bbox="555 1305 2107 1342">• Paragraph: 073 Reference ID: 41-073-20140306 - <i>“A neighbourhood plan may require an</i></li> </ul>

Comment ID	Organisation	Comment
		<p><i>environmental assessment if it is likely to have a significant effect on the environment. Where this is the case the draft neighbourhood plan may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004. This may be the case, for example, where a neighbourhood plan allocates sites for development. A qualifying body is strongly encouraged to consider the environmental implications of its proposals at an early stage, and to seek the advice of the local planning authority on whether the Environmental Assessment of Plans and Programmes Regulations 2004 are likely to apply"</i></p> <ul style="list-style-type: none"> <li>• Paragraph: 074 Reference ID: 41-074-20140306 - <i>"When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:</i></li> <li>• <i>? whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with?</i></li> <li>• <i>the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy</i></li> <li>• <i>whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that</i></li> <li>• <i>set out in the strategic policy without undermining that policy</i></li> <li>• <i>the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach."</i></li> </ul> <p><b>5. Representation to the Lovelace Neighbourhood Plan</b></p> <p>5.1. WPIL make several overarching comments to the LNP in the first instance before outlining detailed comments below.</p> <p>5.2. Despite our comments that the LNP is non-compliant with the NPPF and fails to meet the Basic Conditions a) and d), and as such is therefore unsound unless significant changes were made, the plan remains largely similar in nature to the previous Regulation 14 submission. We, therefore, consider the LNP to be unsound and should not be taken forward to referendum. WPIL's principal objections to the LNP are set</p>

Comment ID	Organisation	Comment
		<p>out below.</p> <p>5.3. The plan is written in a way that does not acknowledge that the GBLP is adopted, nor that WA is an allocation. This is misleading. Not only was the plan adopted on the 25th April 2019, the recent High Court challenge against the plan was dismissed on all three grounds. Therefore, the plan carries full-weight and should be regarded as such.</p> <p>5.4. The specific comments and objections made by WPIL are set out below and are in the order which they appear within the emerging LNP.</p> <p><b><u>Section 1 - Introduction</u></b></p> <p><b>Objection, Paragraph 1.5:</b></p> <p>5.5. Paragraph 1.1 sets out that the LNP ‘cannot object’ to local strategic sites. NPs must be in general conformity with the Local Plans and assist in supporting and delivering those policies, as set out in paragraph 13 of the NPPF: <i>“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies”</i></p> <p>5.6. <u>Change Required:</u> it is fundamental that throughout the LNP, it is made clear that it is in accordance with the GBLP and the LNP should help support the areas strategic policies.</p> <p><u>“1. Define how and where development takes place during the next fifteen years outside of the Local Plans strategic policies, and support the delivery of those strategic sites.</u></p> <p><b>Comment, Paragraph 1.8:</b></p> <p>5.7. Paragraph 1.8 outlined that when considering applications, decision-makers should take into account the whole policy, including sections referred to by the policies in the boxes.</p>

Comment ID	Organisation	Comment
		<p>5.8. <u>Change Required</u>: In addition to paragraph 1.8, the following text should be added to the LNP to ensure that the LNP does not conflict with the GBLP or its strategic allocations (new text underlined). In particular, Policy D1 (Place Shaping) refers specifically to design and creating respectful places in the Borough,:</p> <p><u>5.9. The Lovelace Neighbourhood Plan is non-strategic and therefore the policies within the Plan do not apply to the strategic allocation at Wisley Airfield (Allocation A35 – Guildford Borough Local Plan) or any other strategic allocation within the LNP designated area.”</u></p> <p><b><u>Section 2 - Lovelace Profile</u></b></p> <p><b>Objection, Figure 1:</b></p> <p>5.10. Figure 1 depicts the Green Belt, Ward and Parish Boundaries. This, however, is misleading and out-of-date, as the GBLP, in 4.3.18 cites, “Whilst the general extent of the Green Belt has been retained, the land has been removed from the Green Belt to enable development around Guildford urban area, selected villages and at the Wisley Airfield.</p> <p>5.11. <u>Change Required</u>: The map should be updated to account for the 2019 GBLP Green Belt boundary alterations.</p> <p><b>Objection, Paragraph 6:</b></p> <p>5.12. The LNP now refers to the site as Wisley Airfield/‘Three Farms Meadows’. ‘TFM’ is not an officially recognised name, and reference to it will simply cause confusion and risk ambiguity. The site is referred to WA in the GBLP, the Local Plan Inspectors comments and the previous Appeal. The site should be referred to only as WA to create consistency across the development plan documents.</p> <p>5.13. Furthermore, the paragraph conflates the issue of the AONB ‘views’ with WA. The Inspectors Report on the WA Appeal contended with the issue of views to the AONB, but concluded that the site is difficult to</p>

Comment ID	Organisation	Comment
		<p>discern in the varied landscape and that the Surrey Hills AONB Planning Advisor concluded that the proposed scheme would not materially impact on the AONB and long-range views. This statement should therefore be removed to not contradict the findings of the Inspectors report.</p> <p>5.14. <u>Change Required:</u> All references to ‘TFM’ in the LNP <u>should be deleted, and replace with Wisley Airfield. “Views to the Area of Outstanding Natural Beauty (AONB) to the south” should be deleted.</u></p> <p><b>5.15. Objection, Paragraph 11:</b></p> <p>5.16. This section focuses on public transport in Lovelace and how the area is badly served by public transport. WPIL object to this statement as it demonstrates an absence of appreciation and no acknowledgement of planned public transport improvements arising from the WA new settlement, which has the potential to provide wider benefits to the communities within the NP area.</p> <p>5.17. <u>Change Required:</u> The plan should accurately reflect the GBLP, notably public transport improvements proposed by the Infrastructure Delivery Plan. This section should be reworded to (new text underlined):</p> <p>5.18. The area is <u>currently</u> badly served by public transport and does not have a railway station. Woking is the most popular station as it provides frequent, fast, non-stop services to London Waterloo. West Byfleet, Wisley Property Investments Ltd December 2019 10 Horsley and Effingham Junction are also popular stations, but Guildford station is not. Guildford station is not easily accessible by car due to its location alongside the problematic gyratory system, and higher cost and extended journey time travelling to Waterloo. <u>Currently</u>, all stations are typically accessed by car and morning drop-off and evening pick-up are frequent.</p> <p><b>5.19. Objection, Paragraph 12:</b></p> <p>5.20. It should be acknowledged that a new secondary and primary school is planned as part of the WA strategic allocation.</p>

Comment ID	Organisation	Comment
		<p>5.21. <u>Change Required</u>: This paragraph should be amended to refer to the planned educational improvements planned with the WA allocation.</p> <p><b>5.22. Further Comments</b></p> <p>5.23. Our main concern with this section (and many others in the LNP) is that there is no reference to any strategic allocations and this section is written as if they are not relevant to the future of the parish. Because the LNP is a document intended to be relevant until 2034, it should be written with future changes in mind so far as to not become out of date when the strategic sites come forward. This section of the Neighbourhood Plan should acknowledge the infrastructure and travel improvements planned in the GBLP and be written in a way which reflects, and accepts, these upcoming changes.</p> <p><b>Objection, 2.2 - Ockham Parish</b></p> <p>5.24. No reference to future settlement: Despite a large proportion of Ockham Parish being allocated for 2,000 dwellings with associated infrastructure and employment space, the profile of Ockham fails to consider this relevant in their profile - instead describing the parish how it is now, with poor services and transport, with no acknowledgement of how it is proposed to develop in the coming years. This leads to a misleading picture being presented of the village. The delivery of allocation A35 provides opportunities for the Parish and will include appropriate mitigation.</p> <p>5.25. WPIL are also concerned about the mention of the Chatley Heath Semaphore Tower ‘overlooking’ WA, which implies that WA may cause material harm to the setting of the Grade II* Listed Building. This issue of harm to the Semaphore Tower was raised in the WA Appeal, where it was concluded that there would be no impact on the setting and that built form adds to, rather than detracts from, such views.</p> <p>5.26. <u>Change Required</u>: This paragraph should factor into its description how the parish is expected to change, what services will be added and how the WA allocation will lead to the formation of a fully sustainable settlement. The reference to the semaphore tower which ‘overlooks’ WA should be removed.</p>

Comment ID	Organisation	Comment
LNP19/4	Ripley Parish Council	<b>Ripley Parish Council fully supports the Lovelace Neighbourhood Plan and urges it to be accepted for referendum without modification.</b>
LNP19/40		<p>Re: Lovelace Neighbourhood Plan</p> <p>This is just a short note to say how much I support the comprehensive our recent Lovelace Neighbourhood Plan.</p> <p>I won't repeat the analysis in the documents but suffice to say that I SUPPORT the future ideas for our area but re-iterate concerns of over-development in some areas. The villages just cannot take additional capacity - train stations, already congested regular parking areas, doctor's surgeries etc - just the general infrastructure. You will be able to see from their photos the character of our villages but more importantly it is the safety aspect of already existing narrow roads which concerns me. I can only see the area being able to sustain a substantially lower number of new builds ie those primarily needed for our own surrounding areas as opposed to trying to adapt to fulfil a projection for the Borough's Needs. I really hope that our community's comments are given due consideration,</p>
LNP19/41		<p>I am writing in support of the Lovelace Neighbourhood Plan, as submitted to GBC. There has been a wide and thoughtful debate about the future of the neighbourhood among local residents and businesses and as such the plan represents a pragmatic and welcome step towards setting out a strategy for the important local issues facing the community such as development control, access to good public transport provision</p>



Comment ID	Organisation	Comment
		<p>between major towns and protection of environmentally sensitive areas such as designated green spaces.</p> <p>It is important to ensure that the sense of 'community' and 'localness' for Ripley and its environs is maintained for the future and that development in particular does not exceed the existing scale within the neighbourhood. eg that housing provision is geared to local need, not that of a wider area (such as a larger proportion of the borough).</p> <p>Also that any new housing development should reflect its immediate surroundings and not become an opportunity to build large, 'money spinning' estates which do not support low income families/social housing. In particular the increasing traffic and pollution is already having a detrimental effect on the village and 'over development' will add to the impact on the local community and air quality in particular. For instance proposals to increase capacity at junction 10 of the M25 will add further pressure on an already over loaded transport network whereas local public transport services are poor.</p>
LNP19/42	Cross Group	<p>Please find attached a file with my comments on the Lovelace Neighbourhood Plan for the GBC Public Consultation.</p> <p>-----</p> <p>(Comments pasted below)</p> <p><b><u>The Future of Lovelace Ward - Lovelace Neighbourhood Plan (LNP) Comments</u></b></p> <p><b><u>Making Local and Neighbourhood Plans Compatible (LNP Comments)</u></b></p>

Comment ID	Organisation	Comment
		<p><b><u>Introduction</u></b></p> <p>Firstly, let us consider the makeup of Lovelace; it's a very large ward (the 4<sup>th</sup> biggest in Guildford) but has the smallest population (approx. 2,500 adults and 1,400 homes). It is totally rural in nature, made up of one main village (Ripley) and the hamlets of Ockham and Wisley. It has the anomaly of being the home to the major A3/M25 junction at Wisley and both these HE strategic highways run through Lovelace, roughly north/south (A3) and east/west (M25), but have little bearing on the ward's daily functions, other than when the A3 is blocked..</p> <p>The purpose of the LNP, now submitted for examination, is to understand what the local population see as the future for the ward and how this can be planned in such a way, over the next decade, so as to be compatible with the survival of rural life in Lovelace for generations to come.</p> <p><b><u>The Problems Foreseen with the Current Local Plan as Related to Lovelace</u></b></p> <p>Putting aside a number of smaller local development sites and those others that are outside the ward but will impinge on it (Gosden Hill Farm and several others in Send and Horsleys), the primary development sites in Lovelace are at Garlicks Arch and Ockham. The former is divided between Ripley and Send but will actually be on the main route into Ripley and nearer to Ripley village centre than the Send shops . The latter site (aka the Former Wisley Airfield or Three Farms Meadows) is on isolated high ground less than a mile north of Ripley, alongside the A3 with the M25 running along its northern boundary. Both these greenfield sites are extremely large, with a current total housing target of 2,600 but with further land available at Ockham for more future housing.</p> <p>The first thing to note is that this increase alone will push up the Lovelace population to approximately 7,500 people and the numbers of homes to circa 4,000, that is a 300% increase on both counts. We must therefore be certain that all aspects of the local infrastructure can be increased to cope and that such levels of growth are sustainable in such a rural landscape. After all, this level of growth is totally out of keeping and disproportionate to each and every other ward throughout Guildford Borough and thus Lovelace is a de facto</p>

Comment ID	Organisation	Comment
		<p data-bbox="479 325 987 357">guinea pig in development terms.</p> <p data-bbox="479 392 1223 424"><b><u>The Primary Concerns Addressed by the LNP</u></b></p> <ol data-bbox="539 459 2123 1305" style="list-style-type: none"> <li data-bbox="539 459 2123 916">1. <b>a) Highways:</b> Aside from the A3/M25 motorways, the rest of the ward is served by either single-lane east/west suburban-style roads or else single track ‘country lanes’ with passing points. No other dual carriageways or 2-lane east/west roads exist in the ward or are planned. Taking the housing/population increases of 300% in the next decade or so, it is reasonable to assume the same increase in road traffic. That’s an extra 5,200 private cars using what is a very finite and limited local road network and adding to the 2,800 cars we already have operating locally. Where are the plans to improve the Lovelace local road network? There are plans for spurs at the Send/Clandon junction of the A3 but that is not in the ward, nor will it be particularly helpful. The one major improvement that is really needed, i.e. north-facing spurs on/off the A3 at Ockham roundabout are not being included in either Guildford or Highways England plans? Why not? A further complication is the 50% planned expansion in the membership at RHW Wisley, taking it to 1.5 million by 2023. How much of these factors are in the current traffic modelling exercises? The increased traffic numbers will also severely impinge on the current local parking and shopping facilities in Ripley village itself.</li> <li data-bbox="539 920 2123 1091">2. <b>b) Other Infrastructure Concerns to be Evaluated:</b> The utilities such as electricity, gas, water, sewage, internet, education, healthcare, etc., are all still to be planned in a theoretical sense and nothing concrete is yet on paper on any of these. We know local schooling is a real problem as is the lack of water and sewage capacities. Thames Water alone require 3 years notice to provide a new/increased sewage works to cope with the increased demand in Lovelace.</li> <li data-bbox="539 1096 2123 1305">3. <b>c) Public Transport (or the lack of it):</b> There are no railway stations in Lovelace and none planned. The locals prefer Woking as their main “station of choice” due to its close proximity to the ward as a whole and its fast services to London. There have been no details available as to what new public transport will be made available to cope with this massive population increase or when it may be available. Currently our public bus services finish in the early evening and have large service outages in the afternoons.</li> </ol>

Comment ID	Organisation	Comment
		<p>What we do have, from the Wisley site promoter, is a proposal for privately run community mini-bus service, to run every 30 minutes or so to local places such as Cobham, Horsley, Effingham and Guildford stations, using a fleet of 6 buses and running throughout the day from a number of stops on the very widespread site. The idea that running a regular bus service, via the A3, to Guildford station every 30 minutes but <b>not</b> serving Woking station is a perfect example of muddled thinking (as with Ockham roundabout) and false promises due the its total impracticability. Has any attempt been made to route test this timetable for a minimum week or so?</p> <p><b><u>SUMMARY</u></b></p> <p>Lovelace Ward stands at a major crossroads in its history and the Neighbourhood Plan is a serious, conscientious effort, painstakingly produced, to offer some very real options to GBC so as to avoid the doomsday scenario becoming reality. The ward is the historic home to some wonderful countryside, lovely villages, Wisley RHS Gardens, many Grade 1 and 2 listed buildings and many local farms and equestrian based businesses.</p> <p>Whatever happens in Lovelace must be carefully and meticulously planned and account must be taken of earlier warnings from local highway authorities that the effects of some planned developments would be both “severe” and/or “unmitigatable”. That must be avoided even it is means that some aspects of the Guildford Local Plan(GLP) will need amending. As the Planning Inspector commented in his Appeal Report ref. the Former Wisley Airfield, “development cannot be at <b>any</b> cost” and the ruination of lives in the Ripley, Ockham and Wisley villages is surely too high a price to pay for more housing with grossly inadequate infrastructure.</p> <p>The next stage must be an independent evaluation of the GLP in relation to the LNP and solutions found which reflect the triumph of that which is possible over the impossible.</p>
LNP19/43	Garlick's Arch Ltd	<b>1. INTRODUCTION</b>

Comment ID	Organisation	Comment
		<p>1.1 Icenis are instructed by London Strategic Land to submit representations to Lovelace Neighbourhood Plan Group on the Draft Lovelace Neighbourhood Plan (2019) published for consultation on the 4th November 2019.</p> <p>1.2 Our client is working to deliver a sustainable, residential-led development on the land at Garlick's Arch, Send Marsh, which is located immediately to the northwest of the A3 trunk road and to the southeast of Portsmouth Road, on the south eastern edge of Send Marsh. We are currently preparing a hybrid (part detailed, part outline) planning application in accordance with the adopted site allocation under Local Plan (2019) policy A41 for up to 520 new homes, along with Travelling Showpeople Plots and other works. The preparation of this application has been informed by a significant period of engagement with Guildford Borough Council planning officers, key stakeholders, technical consultees and the local community to inform the delivery of the allocation.</p> <p>1.3 We recognise the merits of neighbourhood planning in enabling communities to shape the areas in which they live and work in promoting new sustainable development. The plan should empower local people to set out a positive vision for how they want their community to be developed over the plan period in line with the emerging Local Plan. There is an opportunity for the Plan to help support the development of a new attractive, healthy and sustainable community as a new extension to the residential neighbourhoods of Burnt Common and Send Marsh.</p> <p>1.4 We provide our comments below in the context of the requirement for the Plan to meet the 'basic conditions' set out in Schedule 4B to the 1990 Town &amp; Country Planning Act (as amended) and other relevant legal requirements, specifically:</p> <ul style="list-style-type: none"> <li>a) The plan's compliance with national policy and advice contained in guidance issued by the Secretary of State;</li> <li>b) How the plan contributes to the achievement of sustainable development;</li> </ul>

Comment ID	Organisation	Comment
		<p>c) The general conformity of the plan with the strategic policy of the development plan for the local area;</p> <p>d) The compatibility of the plan with EU and human rights obligations.</p> <p>1.5 IcenI have reviewed the Draft Neighbourhood Plan Consultation Version (2019) having regard to our client's and Guildford Borough Council's aspirations for the Garlick's Arch site. Accordingly, our client is not seeking significant alterations to the Draft Plan, rather respectfully requesting minor alterations to elements of relevant policy wording to ensure that the Neighbourhood plan position aligns with the Adopted Guildford Local Plan (2019).</p> <p>1.6 We wish to provide comments below on a number of relevant policies included in the latest draft of the Lovelace Neighbourhood Plan, further to our comments on the previous draft of the document in September 2018. We would be pleased to discuss these representations in further detail with the Neighbourhood Plan Group in due course.</p> <p><b>2. BACKGROUND</b></p> <p>2.1 Our client controls the majority of the land allocated for residential development identified at Policy A41 of the Guildford Local Plan (2019) as 'Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley'.</p> <p>2.2 The site is located immediately to the northwest of the A3 (Ripley Bypass), on the southeastern edge of Send Marsh, approximately 2km to the southwest of Ripley and 6km to the northeast of Guildford, with the eastern part of the site falling within the Lovelace Neighbourhood Plan area. The site largely comprises agricultural land. High voltage electricity pylons run through the centre of the site across its full length. A substantial tree belt, comprising an element of ancient woodland, screens the northwestern corner of the site, with another patch of woodland located on the southeastern boundary with the A3.</p>

Comment ID	Organisation	Comment
		<p>2.3 The Site has been scrutinised as part of the extensive consultation periods and Examination in Public prior to being formally included as (the majority part of) an allocation in the adopted Local Plan in April 2019. London Strategic Land and their development partner are currently preparing a hybrid planning application allocation for the site to deliver much needed new housing in the Borough in line with adopted Local Plan 2019 under policy A41, delivering 520 and Travelling Showpeople plots.</p> <p>2.4 We set out below our comments on the broad strategy and specific elements of the Submission Neighbourhood Plan 2019. Where appropriate we have made suggested alterations to the proposed policies and supporting text where we consider that these would assist in meeting the basic conditions and ensuring alignment with the latest position within the Guildford Borough Council Local Plan (2019) which should form the strategic basis for preparation of the Neighbourhood Plan.</p> <p><b>3. REPRESENTATIONS ON THE DRAFT NEIGHBOURHOOD PLAN</b></p> <p><b>Chapter 2: Lovelace Profile</b></p> <p>3.1 The first paragraph of Chapter 2 states that “Lovelace lies within the London Metropolitan Green Belt”. We note that this has been updated from the previous wording in the September 2018 draft of the Neighbourhood Plan, seemingly acknowledging the fact that parts of Lovelace are not designated as Green Belt. However, we note that the accompanying ‘Lovelace Boundary’ plan on page 4 of the draft Plan is out of date, and still suggests that the land at Garlick’s Arch is located within the Green Belt. Given its removal from the Green Belt through its allocation in the 2019 Guildford Local Plan, we consider that this plan will need to be updated to reflect the latest Green Belt boundaries, and to clarify that there are parts of Lovelace which are not subject to Green Belt designation.</p> <p><b>Chapter 3: Constraints and Challenges</b></p> <p><b>Section 3.1</b></p>

Comment ID	Organisation	Comment
		<p>3.2 We note that the second paragraph states “Lovellace is currently 100% Metropolitan Green Belt”. Consistent with the above comments, this statement is inaccurate with land having been removed from the Green Belt as part of the Adopted Guildford Local Plan 2019 (including Site A41). As such, we consider that it is necessary to update this reference to read “Lovellace is currently predominantly Green Belt”.</p> <p>3.3 Furthermore, the reference to the 2019 Local Plan seeking to remove areas from the Green Belt for development is out of date, as the Local Plan has been adopted and the Green Belt boundaries were formally updated upon adoption of the Local Plan. Consequently it will also be necessary to update this reference in order to ensure the accuracy of the Plan.</p> <p><b>Section 3.2</b></p> <p>3.4 We do not consider the assumption that the major projects either already approved or proposed within Lovellace represent a ‘perfect storm’ during the next 10 years as suggested in this section. We highlight that the allocated sites included with Guildford Local Plan 2019 have been subject to public scrutiny and the Council have undertaken robust assessments to justify the Green Belt release over a substantial period of time. Any future planning applications will be supported by detailed technical assessments and mitigation measures as required to ensure the impact of development does not have an unduly harmful impact with regard to relevant considerations.</p> <p><b>Section 3.3</b></p> <p>3.5 In terms of future development pipeline in table 3.3, we request that the reference to the Land at Garlick’s is updated to include the current owners as London Strategic Land. The policy reference should also be updated to reflect the final reference in the adopted Local Plan (A41). Meanwhile the quantum of development being proposed by London Strategic Land is up to 520 dwellings (in addition to the Travelling Showpeople plots required by the Policy), reflecting the fact that the forthcoming planning application will not include the entirety of the allocated site.</p> <p><b>Section 3.3.4.5</b></p>



Comment ID	Organisation	Comment
		<p>3.6 Consistent with the points raised above, we object to the assertion that development of the allocated sites in accordance with relevant Local Plan policy would “have a long term dramatic impact on residents”. Each application will be required to be supported by a range of technical assessment work to demonstrate the acceptability of the development proposals, and in the case of Garlick’s Arch, various measures are proposed that would comprehensively mitigate relevant impacts and provide enhancements to the local area. For example, the Garlick’s Arch site is accessible by sustainable modes of transport including a well-established pedestrian network, existing bus routes that incorporate Clandon Railway Station and cycle lanes along Portsmouth Road. Meanwhile development of the site presents opportunities to enhance existing accessibility through improvements to the local pedestrian network, bus services and stops, and additional cycle lanes. Furthermore, in terms of the reference to “rural amenity”, the development proposals at Garlick’s Arch include significant areas of accessible public open space, which will represent a significant enhancement to the existing agricultural use of the site, for the benefit of existing and future residents.</p> <p>3.7 In addition, as noted above, given the land at Garlick’s Arch has now been formally removed from the Green Belt, its development would not result in the loss of Green Belt, and as such, the reference to Green Belt loss should be updated to ensure consistency with adopted policy.</p> <p>3.8 We therefore consider that the references within this section to significant detrimental impacts on existing local residents of the area and the loss of Green Belt should be deleted, to ensure accuracy and consistency with adopted planning policy.</p> <p><b>Chapter 5: Housing Policies</b> <b>Section 5.1</b></p> <p>3.9 In accordance with our comments above, the reference to Garlick’s Arch on the ninth paragraph on page 25 should be updated to refer to the site having been removed from the Green Belt under Adopted Guildford Local Plan 2019.</p> <p>3.10 Also, consistent with our previous comments on the September 2018 draft of the Neighbourhood Plan,</p>

Comment ID	Organisation	Comment
		<p>the precise quantum of housing proposed for the part of the site falling within Lovelace has yet to be determined.</p> <p><b>Draft Policy LNPH1: Suitability of Development Sites</b></p> <p>3.11 The draft policy suggests that the development should be within the existing settlement boundaries or infill sites but not extend the built form. In this regard, we encourage the Neighbourhood Plan Group to reconsider the wording of the first part of the policy, as clearly the development of allocated sites within the adopted Local Plan would inevitably extend the existing built form of settlements in Lovelace. The policy as currently worded would potentially imply that development should be refused if it results in any extension of the existing settlement form. Clearly, this would not be consistent with the Local Plan or meet the ‘basic conditions’ for a Neighbourhood Plan. Consequently we consider that this part of the text should be updated to clarify that the development of sites allocated in the Local Plan will be supported where they meet the relevant criteria set out in the remainder of the policy.</p> <p>3.12 With regard to the criteria set out in the draft policy, development of the land at Garlick’s Arch will create new built form in the area in accordance with the adopted allocation in the GBC Local Plan (2019). The development of the land at Garlick’s Arch will help support criteria set out in Policy LNPH1 demonstrating sustainability in terms of infrastructure, environmental impact and social cohesion. The new residential development should not have an adverse impact on the Thames Basin Heath Special Protection Area (SPA), through mitigation anticipated to include the provision of a new bespoke 16 ha SANG. Furthermore, the proposed development will promote cycling and pedestrian access and links to sustainable public transport.</p> <p><b>Draft Policy LNPH2: Housing For All</b></p> <p>3.13 We note that the draft policy outlines a set of requirements for major development proposals, stating that such schemes need to provide for all identified needs of the local community with mix criteria for the affordable housing element as:</p> <ul style="list-style-type: none"> <li>• A minimum of 25% will be three-bedroom dwellings;</li> </ul>

Comment ID	Organisation	Comment
		<ul style="list-style-type: none"> <li>• A minimum of 25% will be two-bedroom dwellings;</li> <li>• A maximum of 25% will be one-bedroom dwellings.</li> </ul> <p>3.14 We note that this suggested requirement for the mix of affordable homes is inconsistent with Policy H2 of the adopted Guildford Local Plan, which indicates (at part 4) that: “The tenure and number of bedrooms of the affordable homes provided on each qualifying site must contribute, to the Council’s satisfaction, towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence.”</p> <p>3.15 This indicates a clear requirement to have regard to the SHMA produced by Guildford Borough Council when determining the appropriate mix of affordable housing on a site. The latest SHMA indicates a target mix for affordable housing of:</p> <ul style="list-style-type: none"> <li>• 1 bedroom: 40%</li> <li>• 2 bedroom: 32%</li> <li>• 3 bedroom: 24%</li> <li>• 4 bedroom: 4%</li> </ul> <p>3.16 Consequently there is a clear policy requirement in the adopted Local Plan which, based on the latest evidence base summarised in the SHMA, indicates a requirement for a mix of affordable dwellings that differs from the proposed requirement in draft Policy LNPH2. The supporting text to the draft policy appears to acknowledge the inconsistency and seeks to justify this in part due to perceived impacts on “traffic problems” arising from one bedroom dwellings, however no further justification is provided as to why one bedroom (affordable) units would have an undue adverse impact on the local highways network which would be incapable of mitigation. As such, we do not consider that the proposed mix for affordable housing is justified, and given its inconsistency with adopted Local Plan policy we consider that it does not meet the ‘basic conditions’ required for Neighbourhood Plan policies.</p> <p>3.17 Furthermore, as noted in our comments on the previous draft of the Neighbourhood Plan, the need for</p>

Comment ID	Organisation	Comment
		<p>different sizes of dwellings will clearly change over time, and we consider that it would therefore be more appropriate for the policy to require application proposals to have due regard to the identified local need at the time at which the application is submitted, thereby ensuring the proposed development responds to the actual needs of the community at that time, rather than relying on potentially outdated evidence. Furthermore, we consider that the policy should also take account of the nature of the site, and accordingly the desirability and ability of the application proposals to readily accommodate the range of unit types and sizes identified within the most recent assessment of need.</p> <p>3.18 Furthermore, as noted in our previous representations, the reference to a minimum of 40% affordable housing does not explicitly indicate that achieving this requirement will be subject to this level of affordable housing being viable to deliver. This was a point which the Inspector raised at the Guildford Local Plan Examination, which resulted in the inclusion of part (6) of Policy H2 in the Local Plan to address this point. As such we would expect a similar clause to be included within the Neighbourhood Plan to ensure general conformity with the Local Plan and compliance with the NPPF.</p> <p><b>Draft LNPH3: Housing Design and Density</b></p> <p>3.19 Our client broadly supports the policy aspiration within LNPH3, recognising the important role that the Neighbourhood Plan can play in identifying the special qualities of the area. We have however identified certain aspects of the draft wording which we consider will need updating to ensure clarity and to comply with the 'basic conditions'.</p> <p>3.20 In particular, the references in parts e) and f) of the policy to the height of development proposals and window design could be unduly restrictive in terms of requiring development to match existing patterns of development. The design of development proposals should appropriately respond to specific site character, constraints and opportunities and having regard to relevant input from officers and key consultees, and should not be unduly constrained by arbitrary limits on factors such as height or design. Consequently, we consider that it is necessary to delete these parts of the policy.</p> <p><b>Chapter 6: Environmental Policies</b></p>

Comment ID	Organisation	Comment
		<p><b>Section 6.1</b>  3.21 With regard to the text on page 41 of the draft Plan, in accordance with our comments above, the reference to Lovelace being 100% within the Green Belt will need to be updated, as land has now been removed from the Green Belt through the adoption of the 2019 Guildford Local Plan.</p> <p>3.22 Furthermore, the text on this page indicates that “the Lovelace Neighbourhood Plan reserves the right to make detailed amendments to boundaries of land removed from the Green Belt.” We strongly object to this statement. Notwithstanding the fact that this note is not included within any formal policy text, and does not specify in what circumstances or on what basis the site/ Green Belt boundaries would be amended, it would clearly be inappropriate for a Neighbourhood Plan to seek to amend the boundaries of the Borough’s Green Belt or site allocations that were formally adopted by the Council following endorsement from a Government Inspector and having regard to an assessment of Exceptional Circumstances in accordance with the requirements of the NPPF. Any amendment to the strategic policies of the adopted Local Plan would be beyond the remit of the Neighbourhood Plan, and would not comply with the ‘basic conditions’ for adoption of a Neighbourhood Plan. As such, we consider that it is necessary to delete this sentence from the Plan.</p> <p><b>Section 6.3</b>  3.23 Whilst we note the updates to draft Policy LNPEN2 following our comments on the previous draft of the Plan, the paragraph immediately following the draft policy text includes the suggestion that the “proposal to extend Send Marsh/Burnt Common with new housing and employment will interrupt [a wildlife corridor along Portsmouth Road]”. This appears to be a broad assertion suggesting (without any apparent evidence) that any development at Garlick’s Arch would be unavoidably and unduly harmful in terms of its impact on wildlife in this regard. Given the inaccuracy of this statement, and as this text does not appear to directly relate to or inform the policy text, we consider that it should be deleted. The forthcoming proposals for the development of Garlick’s Arch will be informed by extensive environmental assessments including ecological surveys and assessments, demonstrating the acceptability of the proposals in terms of the impacts and proposed enhancements to local ecology.</p>

Comment ID	Organisation	Comment
		<p><b>Chapter 8: Infrastructure</b> <b>Section 7.1</b></p> <p>3.24 With regards to the public Transport, Cycling and Walking section we refute that the Garlick’s Arch is not within walking distance of local facilities. As noted in the draft Plan, Garlick’s Arch has access to small supermarket at the nearby service station offering and Ripley village. Furthermore, the Neighbourhood Plan text states that the local road is adequate for cyclists to access Send and Ripley Village. The proposal will promote walking and cycling, through enhancements to the permeability of the site to pedestrians and cyclists and potentially improve bus frequencies to the local area. Discussions with GBC and SCC have taken place to explore opportunities to upgrade public transport infrastructure in the Local Area.</p> <p><b>Policy LNPI2: Public Transport and Sustainable Travel</b></p> <p>3.25 With regard to the requirements of the policy, we consider that specific requirements relating to matters such as providing bus services to Woking station do not appear to be appropriately justified by evidence, and in our view it would be more appropriate for the policy to refer to appropriate mitigation and encouragement of sustainable modes of transport to be provided, in accordance with input from the Highways Authority. Similarly, we consider that parking standards and electric vehicle charging provision should be required in accordance with adopted Guildford Borough Council/ Surrey County Council standards.</p> <p><b>Policy LNPI4: Parking</b></p> <p>3.26 The minimum parking standards set out in this policy exceeds the requirements within GBC Vehicle Parking SPD (2006) and Surrey County Council Parking Standards (2018). Part D of the policy criteria seeks the following minimum parking standards:</p> <ul style="list-style-type: none"> <li>• Studio apartments: 1 car Space</li> <li>• 1 bedroom dwelling: 1 car Space</li> <li>• 2 bedroom dwelling: 2 car Spaces</li> <li>• 3 bedroom or larger dwelling: 3 car Spaces</li> <li>• Elderly (sheltered): 0.5 car Spaces per unit</li> </ul>

Comment ID	Organisation	Comment																				
		<p>3.27 We request that the requirements for 2 bed, 3 bed or larger units are amended to recognise the adopted standards set out below.</p> <p><b>Surrey County Council Parking Standards</b></p> <table border="1" data-bbox="486 496 2105 743"> <thead> <tr> <th data-bbox="486 496 1028 584">Land Use C3</th> <th data-bbox="1034 496 1570 584">Minimum Cycle Parking Standards</th> <th data-bbox="1576 496 2105 584">Minimum Car Parking Standards</th> </tr> </thead> <tbody> <tr> <td data-bbox="486 588 1028 639">1 &amp; 2 Bedroom Dwellings</td> <td data-bbox="1034 588 1570 639">1 Space per Unit</td> <td data-bbox="1576 588 2105 639">1.5 Spaces per Unit</td> </tr> <tr> <td data-bbox="486 644 1028 695">3 Bedroom Dwellings</td> <td data-bbox="1034 644 1570 695">2 Space per Unit</td> <td data-bbox="1576 644 2105 695">2 Spaces per Unit</td> </tr> <tr> <td data-bbox="486 700 1028 743">4+ Bedroom Dwellings</td> <td data-bbox="1034 700 1570 743">2 Space per Unit</td> <td data-bbox="1576 700 2105 743">2 Spaces per Unit</td> </tr> </tbody> </table> <p><b>Guildford Borough Council Parking Standards</b></p> <table border="1" data-bbox="486 919 2105 1131"> <thead> <tr> <th data-bbox="486 919 1301 970">Land Use</th> <th data-bbox="1308 919 2105 970">Maximum Car Parking Standards</th> </tr> </thead> <tbody> <tr> <td data-bbox="486 975 1301 1026">1 bedroom per unit</td> <td data-bbox="1308 975 2105 1026">1 car space</td> </tr> <tr> <td data-bbox="486 1031 1301 1082">2 bedrooms per unit</td> <td data-bbox="1308 1031 2105 1082">1.5 car space</td> </tr> <tr> <td data-bbox="486 1086 1301 1131">3 or more bedrooms per unit</td> <td data-bbox="1308 1086 2105 1131">2 car spaces</td> </tr> </tbody> </table> <p><b>4. SUMMARY</b></p> <p>4.1 This document sets out a series of comments on the Draft Neighbourhood Plan on behalf of our Client,</p>	Land Use C3	Minimum Cycle Parking Standards	Minimum Car Parking Standards	1 & 2 Bedroom Dwellings	1 Space per Unit	1.5 Spaces per Unit	3 Bedroom Dwellings	2 Space per Unit	2 Spaces per Unit	4+ Bedroom Dwellings	2 Space per Unit	2 Spaces per Unit	Land Use	Maximum Car Parking Standards	1 bedroom per unit	1 car space	2 bedrooms per unit	1.5 car space	3 or more bedrooms per unit	2 car spaces
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		<p>London Strategic Land.</p> <p>4.2 Our client controls the majority of the land known as Garlick’s Arch and is committed to delivering the site as a residential-led development. Significant engagement has already taken place with the GBC planning team, Local Parish Councils, GBC Councillors and the local community to bring forward the site as a new sustainable community as an extension to Send Marsh.</p> <p>4.3 We welcome the opportunity to work constructively and collaboratively with the Neighbourhood Plan Group to shape the emerging Plan further. Our client is broadly supportive of the proposed strategy as set out within the current consultation draft Neighbourhood Plan. However, as detailed above there are certain aspects which we would encourage the Group to consider further in order to ensure that all the proposed policies are robust and meet the ‘basic conditions’, having regard to Schedule 4B to 1990 Act.</p> <p>4.4 We therefore respectfully ask that our comments are considered and that the necessary modifications are made to strengthen the Plan. This scrutiny is critical to improving the robustness of the Draft Neighbourhood Plan and we request that our comments are fully taken into account at this stage. Please do not hesitate to contact Icen Projects should you wish to discuss any of these matters further.</p>
LNP19/44		<p>I support the LNP in the proposal of housing for local needs rather than very large developments. Also to control an increase in traffic and providing good transport links to Woking and Guildford and, very importantly, to protect the green spaces around us.</p>
LNP19/45		<p>I wish the local housing requirements to be considered, not those for the whole borough. We need to protect the green belt in this already crowded area. We also need to improve infrastructure and services for local people. Public transport and schools are both lacking. We do not need large developments but smaller pockets of development proportionate to the size of local villages.</p>



Comment ID	Organisation	Comment
LNP19/46		<p data-bbox="483 325 1055 352">LOVELACE NEIGHBOURHOOD PLAN</p> <p data-bbox="483 395 2092 496">The designation by Guildford Borough Council of the Lovelace Wards – Ripley, Ockham and Wisley - as a neighbourhood area does not appear to be compliant with s 61F and 61G of the Town and Country Planning Act 1990. A check needs to be carried out to see if the inclusion of Wisley in the Lovelace plan is lawful.</p> <p data-bbox="483 533 2085 633">S 61F (1) provides that a parish council can be authorised to act in relation to a neighbourhood area if that area consists of or includes the whole or any part of the area of the Council. S 61G defines neighbourhood area in the same terms.</p> <p data-bbox="483 670 2101 738">S61F (2) enables a neighbourhood area to include the whole or part of the area of another parish council if the other parish council consents.</p> <p data-bbox="483 775 2092 876">Both Ripley and Ockham have parish councils, but Wisley does not. Ripley and Ockham Parish Councils can agree for Ripley to make an application for Ripley and Ockham to be a designated area, but the inclusion of Wisley is unlawful. There is no parish council for Wisley to give consent.</p> <p data-bbox="483 912 1995 1013">The relevant section of the Neighbourhood planning Guidance from the Ministry of Housing &amp; Local Government, para 026 Reference ID: 41-025-20140306, dated 06 03 2014, makes no reference to the inclusion of non-parished areas.</p> <p data-bbox="483 1050 2110 1235">The application for designation made by Ripley Parish Council, dated 7<sup>th</sup> January 2015, refers to a Wisley community group to be involved. There appears, however, to have been no designation by Guildford Borough Council of any organisation or body for Wisley as a neighbourhood forum under s 61F (3)-(5) of the 1990 Act. A Wisley neighbourhood forum would be the only body that can be authorised in relation to a Wisley neighbourhood area. There is no Wisley neighbourhood forum.</p> <p data-bbox="483 1272 2107 1340">If the inclusion of Wisley in the Lovelace plan was unlawful, all references to Wisley should be removed from the plan.</p>

Comment ID	Organisation	Comment
LNP19/47		<p>Lovlace Neighbourhood Plan (LNP)</p> <p>The continued inclusion of Three Farm Meadows in the Guildford Local Plan and the GBC's use of taxpayers money to defend it, despite rejecting it themselves, is a disgrace.</p> <p>Three Farm Meadows is not a sustainable site in any understanding of that term. There is no infrastructure to support it and it would place excessive strain on the existing facilities.</p> <p>The LNP is correct in its opposition.</p>
LNP19/48		<p>GBC should not have allowed the number of houses in the Garlick's Arch application to be increased.</p> <p>This development will cause serious issues with local infrastructure, which is already inadequate.</p> <p>In addition it will destroy or damage a designated area of Ancient Woodland.</p>
LNP19/49		<p>Lovlace Neighbourhood Plan (NLP) correctly identifies that new housing proposed in the Guildford Local Plan is excessive and not proportionate.</p> <p>The document properly identifies infrastructure, including public transport and schools, and the local environment as under threat from new development.</p> <p>Green Belt was not defined as a temporary measure, but a permanent one. LNP correctly states that it should not be lightly disregarded.</p>

Comment ID	Organisation	Comment
LNP19/5		<p>I wish to comment on the Lovelace Local Plan as follows:-</p> <p>1 While the plan includes the wish to have the north facing slip roads constructed at the Send interchange the equally important south facing slip roads at the Ockham roundabout are not included in the plan. This stretch of the A3 was known and built as the Ripley bypass but does not function as such if traffic to and from the B2039 cannot not get off or on the bypass and has to go through Ripley to go south. Similarly traffic on the A3 from the south wishing to go Wisley (planned annual visitors up to 1.4m in 3 years time), even with the new access to Wisley off the Ockham roundabout, has to go through Ripley. Without the south facing slip roads at Ockham the bypass is not a bypass.</p> <p>2 Again as inferred in point 1 above there is too much other traffic going through Ripley, this time to and from the A3 to Woking, never mind Newark Lane being totally unsuitable for this volume of traffic. The north Ripley Bypass should be included in the plan, a single carriageway road from the Ockham roundabout across the fields to the Pyrford church area.</p> <p>With these 2 major enhancements to the local road network, as well as the north facing slip roads at Send, Ripley will be be a much more pleasant place to live and work, reverting to the quiet established community of old.</p>
LNP19/50		<p>TBHSPA has been defined and protection introduced at huge expense and effort.</p> <p>LNP rightly points out that large developments in Lovelace will have a detrimental impact on the SPA.</p>
LNP19/51		<p>Dear Sir,</p> <p>I am writing to you in support of the Lovelace Neighbourhood Plan.</p>

Comment ID	Organisation	Comment
		<p>It is important that the local voice is heard and I consider that the group who compiled the plan worked very hard to consult with those who live in the area, and then put forward many important factors which affect our way of life. Those of us who have lived in the area for most of our lives consider that the locality in which we live has much that is worthy of protection, and once this plan is adopted we will feel that the local point of view will be taken into consideration, particularly with reference to planning matters, to a greater extent than it is at present.</p>
LNP19/52		<p>Dear Sirs</p> <p>I write to you to say I am in full support of the LOVELACE NEIGHBOURHOOD PLAN (LNP).</p> <p>I totally deplore your disastrous decision to leave the FORMER WISLEY SITE (THREE FARMS MEADOWS) in the *GUILDFORD BOROUGH COUNCILS LOCAL PLAN* as well as withdrawing GREEN BELT PROTECTION from the above mentioned site.</p> <p>The (LNP) is well thought plan drawn up after full consultation with local communities and interested and effected parties. It (ILLEGIBLE WRITING) addresses the following parts:</p> <ol style="list-style-type: none"> <li>1. Allows local housing for local needs not the monstrous 20-25% of the Boroughs needs.</li> <li>2. Proposed developments will be proportionate to the area and surroundings rather than out of place oversized projects.</li> <li>3. Steps taken to central traffic pollution on local roads.</li> <li>4. Improve and maintain local infrastructure.</li> <li>5. Improve and maintain good public transport to Guildford and Woking stations, shopping centres etc.</li> </ol>

Comment ID	Organisation	Comment
		<p>6. Defend local green spaces and local environments.</p> <p>7. Protect us all from this "Half Baked' Tory- Lib Dem Local Plan.</p>
LNP19/53		<p>Dear Sirs</p> <p>I fully support the Lovelace Neighbourhood Plan which accurately recognises the traffic problems from the proposed large developments at either end of Ripley Village without sensible mitigation. We need housing close to facilities, not large developments that will greatly increase traffic on the local roads. Nor do we need offshore companies ruining our locality.</p> <p>The proposal for a full junction at Burnt Common to "relieve" traffic is pie in the sky. The 4-way junction should be where traffic will be entering the road system, I.e. at Ockham Roundabout.</p> <p>I hope that you will take this into consideration.</p>
LNP19/54	Savilles	<p>[Part 2 of 4)</p> <p><b>Section 3 - Constraints and Challenges</b></p> <p><b><u>Objection, 3.1 - Green Belt.</u></b></p> <p>5.27. Whilst WPIL agrees with the definition of the Green Belt outlined, the paragraph misleadingly conflates landscape designations (TBHSPA, SSSIs, SNCIs etc) with the Green Belt, which is solely a planning designation, with a fundamental aim to prevent urban sprawl. This is described in paragraphs 133 and 134 of the NPPF. The landscape designations mentioned are correct, yet should be reserved for a separate section as to not conflate the two points.</p>

Comment ID	Organisation	Comment
		<p>5.28. Furthermore, since the adoption of the GBLP 2019, Lovelace is no longer 100% metropolitan Green Belt. Part of the parish including north of East Horsley, Ripley and the land part of A35 are no longer washed over by Green Belt. The LNP must provide a positive planning framework for those areas which are no longer Green Belt land.</p> <p>5.29. The plan must propose a plan led response to development in Ripley, based on the new settlement boundaries. It need not repeat those policy requirements for A35.</p> <p>5.30. <u>Change Required:</u> This paragraph should, therefore, be reworded to read: “The Green Belt was introduced on 3rd August 1955. In 1988 the Principles of the Green Belt were incorporated in Planning Policy Guidance Note No. 2 (PPG2) issued by the Government. PPG2 has now been superseded by the National Planning Policy Framework. <u>The Green Belt is solely a planning designation with a primary purpose of preventing urban sprawl.</u> Lovelace is currently largely Metropolitan Green Belt and is predominantly rural. The Green Belt provisions have been sufficient to limit development outside the settlement boundaries, <u>yet certain areas have been removed from the low-performing areas of Green Belt to allow for sustainable development.</u> The GBLP 2019 has removed two large areas in Lovelace for development together with inseting Ripley village.”</p> <p><b>Objection, 3.2 - Pipeline of Projects</b></p> <p>5.31. WPIL concurs with the wording of the Neighbourhood Plan that strategic development sites are not within the remit of the Neighbourhood Plan. The Neighbourhood Plan should fully accord, and support, the GBLP and therefore the LNP should not undermine or conflict these polices. The last sentence, mentioning how the ‘major projects’ will have ‘severe impact on Lovelace inhabitants and workers’ is overly negative and does not support the delivery of strategic policies, and as such is contrary to the PPG (41-004-20190509).</p> <p>5.32. <u>Change Required:</u> To comply with the NPPF and ensure general conformity with the GBLP, this section should be re-written to be more supportive in tone to the strategic allocations.</p>

Comment ID	Organisation	Comment
		<p><b>Comment, 3.3 - M25/A3 - Junction 10 Improvements</b></p> <p>5.33. WPIL supports the LNP outlining the future improvements planned for this junction due to strategic allocations in this location. We request however that changes are made at the end of the section to reflect the comments made in the Wisley Airfield Appeal Decision. Paragraph 29 of the Appeal Decision outlined that there would be no evidence to suggest that the proposal would result in harm to the air quality in Ripley. Furthermore, Paragraph 8.14 of the same report outlined that there would also be “no likely significant effect on the TBHSPA”. This should, therefore, be updated to reflect the most up to date evidence.</p> <p>5.34. The LNP should further include comments and Development Consent Order (DCO) process and be responsible and acknowledge its findings.</p> <p>5.35. <u>Change Required:</u> The paragraph “HE acknowledges there will be changes to levels of air and noise pollution and loss of habitat for rare species due to TBHSPA/SSSI land being commandeered for this purpose” is not in accordance with evidence cited in the Appeal Decision/Inspectors Report into the GBLP, <u>therefore this should be removed.</u></p> <p><b>Objection, 3.3.4.1 Wisley Airfield/Three Farms Meadows</b></p> <p>5.36. Section 3.3.4.1 relates to the Wisley Airfield and as outlined above WPIL object to the reference to the site as Three Farms Meadows (‘TFM’). This site description does not attempt to describe the scheme, instead goes into large detail about the previous refusal. This focus on the constraints and concerns within the description with no mention of the benefits of the scheme implies an objection to the site. This is wholly inappropriate for inclusion in a NP and is not be in line with the GBLP. In addition, and as outlined above, the LNP makes inaccurate comments in respect of:</p> <ul style="list-style-type: none"> <li>• 100% Green Belt - this is no longer the case since the adoption of the GBLP.</li> <li>• Implies that the scheme would have an adverse impact on the TBHSPA</li> <li>• Adverse effect in construction, residential traffic and air quality.</li> </ul>

Comment ID	Organisation	Comment
		<ul style="list-style-type: none"> <li>The mention of 'high-quality farmland' which is contrary to an Agricultural Land Assessment which was undertaken on site and found only limited agricultural value.</li> </ul> <p>5.37. These matters were considered and settled within both the GBLP Inspectors decision, and more recently, the High Court Ruling on the GBLP (Compton Parish Council et al. V Guildford Borough Council et al. [2019] EWHC 3242 (Admin)). Matters including air quality, the TBHSPA and strategic transport were considered and all matters were found to be sound and consistent, with no adverse impact resulting from Allocation A35. The LNP should therefore not seek to re-raise this issues as concerns when they have already been meticulously considered.</p> <p>5.38. <u>Change Required</u>: The LNP should reflect the GBLP, and hence should either have no direct references to Allocation A35 (Wisley Airfield), or where it is referred it should accurately reflect the GBLP. <b>Section 3.3.4.1 should be deleted.</b></p> <p><b><u>Section 5 Housing Policies</u></b></p> <p>5.39. This section contains a background to housing development within the wider Borough and the LNP area. The NP Group should ensure that this is updated to reflect the most up to date evidence being produced to support the GBLP. It should also not be written to infer that the Local Plan is not adopted - the strategic sites are now part of the development plan - not simply 'proposed' as the LNP describes.</p> <p><b>Comment, LNPH1 Suitability of Development Sites</b></p> <p>5.40. Policy LNPH1, Suitability of Development Sites sets out several criteria for new development. The LNP should make clear that this policy is not relevant to the strategic allocation at WA or other strategic allocations, to be in general conformity with the GBLP. The LNP should plan positively to support the strategic policies of the development plan. In a wider context the criteria set out in LNPH1 is not considered to be in line with the NPPF or the GBLP in respect of infrastructure, ecology, mitigation and nature conservation. LNP should consider rewording this policy to ensure it is consistent with national and local</p>



Comment ID	Organisation	Comment
		<p>policy and does not conflict with site specific policy. It should not be worded as to undermine the deliverability of the GBLP strategic policies.</p> <p>5.41. <u>Change Required</u>: The plan is not strategic, and hence it must be made clear that policy LNPH1 does not affect Allocation A35 (Wisley Airfield). This policy should be revised as follows (new text underlined):</p> <p>5.42. Development will be supported where it is consistent with national policy and does not harm the TBHSPA, Green Belt or rural character of the Lovelace area and meets the following criteria. <u>This policy applies to non-strategic development only”</u></p> <p><b>Objection, LNPH2 Housing For All</b></p> <p>5.43. As set out above, the LNP should be clear that Policy LNPH2 Housing For All does not apply to the development at WA. This policy is not in line with the evidence submitted to support the GBLP in terms of housing need and is not consistent with the policies of the GBLP. Furthermore, there are elements of the policy which contradict the evidence within the reasoned justification, the GBLP or both:</p> <ul style="list-style-type: none"> <li>• The housing mix suggests a mix for affordable dwellings which does not correlate with that in the 2015 SHMA for North West Surrey. Furthermore, in paragraph 4.2.4 of the GBLP, it is stated that there is a need for 30% 1-bedroom properties, whilst LNPH2 sets a requirement of a maximum of 25%. This is both arbitrary and not in general conformity with the GBLP.?</li> <li>• Recent appeal decisions have outlined that housing mix identified in the SHMA is a guide, and to be used flexibly.?</li> <li>• The evidence for diverging from local policy is weak, outdated and largely based on neighbourhood respondents.</li> </ul> <p>5.44. <u>Change Required</u>: The plan is not strategic, and hence it must be made clear that the Housing Mix policy does not affect Allocation A35 (Wisley Airfield). This policy should be revised as follows (new text underlined):</p>

Comment ID	Organisation	Comment
		<p>5.45. Policy LNPH2: Housing For All: Development proposals that meeting identified needs of the Lovelace community in terms of housing mix will be supported. Developments may include affordable homes to rent, shared ownership, discounted market sale homes, affordable homes to rent, social housing, right to buy, starter homes, help to buy together with self-build projects and market-value housing. <u>This policy applies to non-strategic development only and the NP Group will work with GBC and Applicants to ensure strategic development addresses local needs.</u></p> <p><b>Objection, LNPH3 Housing Design and Density</b></p> <p>5.46. Policy LNPH3 Housing Design must refer to individual design guidance mentioned in strategic policies. It should ensure that it is not simply repeating guidance within the GBLP. This is to ensure that a design policy is not overly restrictive, and does not prevent the timely delivery of developments. In its current form WPIL object to this policy, notably the restriction that residential developments will be a maximum of three storeys. The reasoned justification should remain relevant to the policy, and not digress onto other matters such as the TBHSPA and SANGs.</p> <p>5.47. Policy D1 of the GBLP sets out that all strategic developments such as that at WA need to produce Masterplans which will be subject to a Design Review Panel. They must ensure that they respond to their immediate surrounds and context. This policy is clear regarding design and density for the Strategic Allocations, and need not be repeated or diverged in a separate Neighbourhood Plan policy as this design process will set appropriate parameters for WA.</p> <p>5.48. <u>Change Required:</u> The plan is not strategic, and hence it must be made clear that the Housing Mix policy does not affect Allocation A35 (Wisley Airfield). This policy should be revised as follows (new text underlined):</p> <p>5.49. Policy LNPH3: Housing Design and Density: Development proposals will be supported providing they are well designed, enhance the special qualities of each location and are sympathetic to local character and history. <u>This policy applies to non-strategic development only.</u></p>

Comment ID	Organisation	Comment
		<p><b><u>Section 6 Environment Policies</u></b></p> <p><b>Objection, LNPEN2 Biodiversity and Natural Habitats</b></p> <p>5.50. Despite our previous comments outlining inconsistencies, the policy is not considered to be drafted in an appropriate manner that reflects national policy, local policy or established ecological principles. The issues identified with this policy wording include:</p> <ul style="list-style-type: none"> <li>• The policy as a whole should make clear that a mitigation hierarchy be applied in designing development proposals;</li> <li>• Point B is inconsistent with wording in GBLP p.5 and does not account for avoidance and mitigation measures.</li> <li>• Point E - would be more accurate to state <i>“development design should apply the mitigation hierarchy, with habitat translocation proposed as a last resort”</i>.</li> <li>• Point G - Would be more accurate to require the <i>“retention and enhancement of features of significant ecological importance, where possible”</i>.</li> <li>• Point H - Is not consistent with the GBLP and often trees removed are of no ecological importance, non-native species or dead/dying/dangerous. This should be site-specific and not overly prescriptive.</li> <li>• Point 6 would be more accurate to refer to the retention of certain habitat features, however, there is would be more accurate to require the <i>“retention and enhancement of features of significant ecological importance, where possible”</i>.</li> </ul> <p>5.51. WPIL questions whether this policy adds anything locally distinctive to differentiate it from the GBLP and therefore why it is required to be included in the LNP. There is a significant and detailed policy in regards to the TBHSPA and SSSIs within Policy P5 of the GBLP. In addition, some of the supporting text remains inaccurate despite our previous representations:</p> <ul style="list-style-type: none"> <li>• Page 47 of the LNP sets out that <i>“unlit countryside and roads encourages nocturnal wildlife”</i>. This should be reworded and currently this implies that wildlife is attracted to the area because the roads</li> </ul>

Comment ID	Organisation	Comment
		<p>are unlit. This is not an accurate implication as the habitat type is the major factor influencing the distribution of wildlife.</p> <p><u>Change Required:</u> This paragraph should be reworded to read (new text underlined): “most areas of countryside are unlit which does not deter nocturnal wildlife”;</p> <ul style="list-style-type: none"> <li>• The text on page 47 refers to wild deer which are not considered to be features of notable ecological importance;</li> <li>• The text on page 46 refers to the Biodiversity 2020 and not the 25-year Environment Plan which post-dates this; and?</li> <li>• As previously mentioned, the LNP should not undermine strategic policies. With a policy in the Neighbourhood Plan proposing that no development should be supported which would lead to increased visitor pressure on the TBHSPA, and in the reasoned justification going on to state that the proposed development at WA will increase visitor pressure, creates a conflict with the GBLP and undermines the strategic policy.?</li> <li>• <u>Change Required:</u> The reasoned justification which discusses the WA should be significantly reworded so to not infer an unacceptable effect on the TBHSPA, or be removed as to not conflict with the strategic allocation.</li> </ul> <p>5.52. <u>Change Required:</u> The plan is not strategic, and hence it must be made clear that the Biodiversity and Natural Habitats policy does not affect Allocation A35 (Wisley Airfield). Importantly, the Policy should either be significantly reworded or deleted in order to be accurate and to reflect appropriate national policy and legislation. Besides, the matter of biodiversity and natural habitats conservation and enhancement is covered by the GBLP policy framework. <b>WPIL, therefore, considers that the policy should be deleted.</b></p> <p><b>Objection, LNPEN3 Flooding</b></p> <p>5.53. WPIL has no specific comment to make on the policy. WPIL questions whether this policy adds anything locally distinctive to differentiate it from the GBLP. The GBLP Policy P4 on flooding is sufficient and detailed.</p> <p>5.54. <u>Change Required:</u> The plan is not strategic, and hence it must be made clear that the Flooding policy</p>

Comment ID	Organisation	Comment
		<p>does not affect Allocation A35 (Wisley Airfield). This policy should be revised as follows (new text underlined):</p> <p>“Policy LNPEN3: Flooding Development in Lovelace will be supported where consideration is given to current flooding areas in Lovelace and the impact of any new development <u>This policy applies to non-strategic development only</u>”.</p> <p><b>5.55. Objection, LNPEN4 Light Pollution</b></p> <p>5.56. WPIL questions whether this policy adds anything locally distinctive to differentiate it from the GBLP or is based on any evidence base. WPIL also has concerns that the policy is unnecessarily constrictive. It should also be noted that all new major development is required to have new street lighting for safety and security reasons. This can be done in a way that is sympathetic to wildlife and minimises light pollution. Therefore, the statement on page 54 that the proposed major developments street lighting having an impact on wildlife (consequently being in contrary with point B of the policy) has the effect of undermining the strategic policies. WPIL, therefore, deem the policy to be superfluous and not in general conformity with the GBLP.</p> <p>5.57. <u>Change Required</u>: WPIL, therefore, considers that the policy should be deleted.</p> <p><b>Objection, LNPEN5 Air Quality and Traffic</b></p> <p>5.58. This policy and reasoned justification is overly negative in tone and makes some misleading and wrong assumptions about the air quality being in excess of acceptable levels. The issues with the policy wording include:</p> <ul style="list-style-type: none"> <li>• As outlined in our previous representations on the matter, the policy does not accurately reflect the National Objectives and Ambient Air Quality Directive and does not reflect Ripley currently not exceeding the EU limit values based on national modelling.</li> </ul>

Comment ID	Organisation	Comment
		<ul style="list-style-type: none"> <li>• The policy appears to suggest that any proposal which ‘increases traffic’ will not be supported. This is not a sustainable policy and is not compliant with NPPF paragraph 109 – where it is stated that development should only be prevented or refused on traffic grounds where the residual cumulative impacts are severe.</li> <li>• The reasoned justification is excessive and strikes an overly-negative tone and is not in general conformity with the strategic allocations.</li> <li>• Point C refers to an Ecological Assessment, however, it is not clear what is meant by this or what this should include. This appears to be a misunderstanding of the ecological assessments that can be undertaken.</li> <li>• The reasoned justification cites that strategic developments in Ripley will be opposed, due to ‘carbon emission increasing’ and that ‘increased traffic not being acceptable’. This does not include any comments concerning potential infrastructure and travel improvements, mitigation measures or movements towards a zero-carbon future. Wording such as this is not in conformity with the Local Plan and has the effect of pre-determining any application.</li> <li>• A statement of common ground has been prepared between WPIL and Highways England (HE). This states that subject to certain terms set out in the statement, HE is prepared to withdraw its objection. Furthermore, the Inspectors Comments on the GBLP further makes clear that any concerns expressed by the Inspector and the SoS about the impact on the strategic road network, capable of resolution. With this agreed, the LNP should not undermine this position, which has been agreed after a long process of cooperation.</li> </ul> <p>5.59. The High Court Judgment for the GBLP at paragraph 208 is clear that GBC’s conclusion on air quality was reasonable and based on a lawful approach, and as such the claim of the air quality impact of the allocation at Wisley Airfield was rejected by the Judge.</p> <p>5.60. The statement in LNP in respect of air quality being ‘in excess of acceptable levels’ misrepresents the definition of an ‘environmental standard’ (critical load or level). The LNP does not appear to have fully understood this issue and the text should be reworded to ensure it accurately portrays the current situation.</p>

Comment ID	Organisation	Comment
		<p>5.61. <u>Change Required</u>: This policy and the supporting text should be amended to reflect national policy and relevant legislation, contain reasonable and justified proposals that are evidenced to reduce air quality and provide further detail on required assessments. Importantly, the Policy should either be significantly reworded or deleted in order to be accurate and to reflect appropriate national policy and legislation. It should also not set impossible hurdles which strategic development will never be able to meet. The matter of air quality and pollution is covered by the GBLP policy framework, and it is not clear why Lovelace needs a wholly separate policy as well. <b>WPIL, therefore, considers that the policy should be deleted.</b></p>
LNP19/55	Savilles	<p>[Part 3 of 4]</p> <p><b><u>Section 7 Infrastructure Policies</u></b></p> <p><b>Comment, LNPI1: Infrastructure</b></p> <p>5.62. Policy LNPI1 states that infrastructure should be delivered prior to occupation. WPIL disagree with this, as whilst some infrastructure will be delivered prior to occupation, some infrastructure will not. For instance the provision of the schools will need a critical mass in place prior to opening. Furthermore, condition h) which stipulates ‘piped gas’ to be provided risks soon being outdated, with Government standards bringing to an end gas boilers in 2025. <b>WPIL, therefore, considers this element of the policy should be deleted.</b></p> <p>5.63. In addition, WPIL questions whether this policy adds anything locally distinctive to differentiate it from the GBLP policies ID1-ID4.</p> <p>5.64. <u>Change Required</u>: The plan is not strategic, and hence it must be made clear that the flooding policy does not affect Allocation A35 (Wisley Airfield). Policy A35 includes substantial infrastructure requirements</p>

Comment ID	Organisation	Comment
		<p>and will deliver significant infrastructure including a General Practitioners surgery, community building, educational facilities, cycle network, bus network and two slip roads. This policy should be revised as follows (new text underlined):</p> <p>“<b>Non-strategic</b> development requiring new or changed infrastructure should demonstrate how it takes account adjoining or co-joining infrastructure requirements and developments in the area during the life of this plan. <b>Non-strategic</b> developments where new or improved infrastructure is required must ensure..”</p> <p><b>Objection, LNP12: Public Transport and Sustainable Travel</b></p> <p>5.65. WPIL deem this policy to be written in a manner in conflict with the Local Plan and the strategic allocations. Notably:</p> <ul style="list-style-type: none"> <li>• There are no specifics to how development can encourage ‘car-sharing’, which creates an overly ambiguous policy;</li> <li>• The NPPF defines ‘sustainable transport modes’ as any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car-sharing and public transport. Therefore, specifics on ‘electric buses’ should be reserved to an aspiration rather than a policy.</li> <li>• Both strategic policies and GBLP policies ID1-ID4 set out infrastructure requirements for strategic development.?</li> <li>• The plan is not strategic, and hence it must be made clear that the infrastructure policies are for non-strategic development only, and do not affect Allocation A35 (Wisley Airfield). Policy A35 includes substantial infrastructure requirements. A Neighbourhood Plan must be in general conformity with, and plan positively to support, the strategic policies of the development plan.</li> </ul> <p><u>5.66. Change Required:</u></p>



Comment ID	Organisation	Comment
		<p>5.67. “Developments which reduce the need for car use are supported and they should all offer sustainable transport choices. Where appropriate, major developments should provide or contribute financially to the delivery of public transport during the lifetime of this plan through either CIL or S106 contributions.” <a href="#">This policy applies to non-strategic development only</a>”.</p> <p>5.68. As consistent with earlier parts of the LNP, the reasoned justification of Policy LNP12 describes public transport experiences as they are now. WPIL object to this as it demonstrates an absence of appreciation and no acknowledgement of planned public transport improvements arising from the WA new settlement, which has the potential to provide wider benefits to the communities within the NP area, such as new slip-roads, bus network in perpetuity, cycle route and traffic mitigation measures for the existing rural roads. These improvements were recognised in the previous Appeal Decision where Surrey County Council raised no objection. In order to provide an accurate and balanced view, <a href="#">the LNP should recognise these planned improvements</a> to provide an objective view which will be relevant throughout the lifetime of the plan.</p> <p><b>Objection, LNPI3: Cycling and Walking</b></p> <p>5.69. It is not clear why these issues are necessary for a standalone policy and cannot be included within LNPI2 – Public Transport and Sustainable Travel. WPIL makes the following comments on this policy:</p> <p>5.70. Continuing with the previous comments of the Neighbourhood Plan, LNP makes no acknowledgement of the travel improvements that are planned through the WA strategic allocation and how these will benefit residents. For example, requirement (6) of Policy A35 in the GBLP states: “An offsite cycle network to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade, Ripley and Byfleet to be provided with improvements to a level that would be attractive and safe for the average cyclist”. This should be acknowledged within the reasoned justification.</p> <p>5.71. The policy and reasoned justification wording create an immediate conflict. In the reasoned justification, it is stated that “The WA/TFM site is within an easy walk to Ockham and Wisley Commons and, realistically, it would <a href="#">be impossible to avoid increased recreational use of the Commons</a> and footpaths on the</p>

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		<p>TBHSPA.</p> <p>5.72. By the policy requiring there to be no increase in visitor pressure on the TBHSPA, and the reasoned justification outlining that this would be ‘impossible to avoid’, means that Policy LNPI3 undermines the strategic policy A35 of the GBLP. Notwithstanding this comment, it is not based on evidence from the WA Appeal, whereby Natural England raised no objection to this site coming forward, nor did they during the Local Plan consultation. This statement is not reflected in policy or evidence.</p> <p>5.73. Furthermore, not only does this mean that this policy is not in general conformity with the GBLP, the Wisley Appeal stated that <i>‘The habitats assessment and air quality review for the eLP concluded that there would be no significant effect on the TBHSPA’</i> - so the statement in the LNP is not corroborated by evidence.</p> <p><u>5.74. Change Required</u></p> <ul style="list-style-type: none"> <li>• “All developments are required to provide footpaths within the development. Major developments will provide safe and convenient walking and cycling links to nearby facilities. <u>This policy applies to non-strategic development only.</u>”</li> <li>• Reasoned Justification: “Lovelace is <u>currently</u> not well served with cycle lanes and pavements. There are <u>currently</u> no full specification cycle lanes (separating cycles and vehicles) in Lovelace, only a painted line on the single lane in both directions on the Portsmouth Road through Ripley. <u>As Policy A35 of the Local Plan outlines, a new safe and attractive cycle network is planned within the WA allocation which will offer improvements in reaching destinations including Effingham Junction railway station, Horsley railway station/Station Parade, Ripley and Byfleet. This will substantially improve the cycling provision in Lovelace.</u>”</li> <li>• The conflict identified in paragraph 5.61 should be amended and any reference to WA having an adverse impact on the TBHSPA removed. The LNP must plan positively to support the strategic allocations within the development plan.</li> </ul> <p><b><u>Objection, LNPI4: Parking</u></b></p>

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		<p>5.75. In line with the comments made above, this section of the Plan demonstrates an absence of appreciation and no acknowledgement of planned improvements arising from the WA A35 allocation, which has the potential to provide wider benefits to the communities within the LNP area. These policies should not affect nor contradict the GBLP and are currently not considered to be effective.</p> <p>5.76. <u>Change Required:</u> The plan is not strategic, and hence it must be made clear that these various parking policies do not affect Allocation A35 and interfere with the requirements set out within this.</p> <p><b><u>Objection, LNPI5: Community Facilities</u></b></p> <p>5.77. All developments which provide or support community facilities should be supported. However, the LNP sets strict requirements for their delivery on location, being sustainably located, providing green space, flexible space and not interfering with the TBHSPA. This is unnecessarily burdensome on an entirely beneficial activity and no criteria are set to how a community facility can 'reduce car usage'.</p> <p>5.78. Strategic allocations have their own requirement with regard to community facilities. For example, in WA specifically, a new community facility will be provided alongside healthcare infrastructure, education and outdoor spaces. The delivery of this will improve access to community facilities in the local area. Therefore, in order to not conflict with Policy A35, Policy LNPI5 should be for non-strategic development only.</p> <p>5.79. <u>Change Required: Therefore, in order to not conflict with Policy A35, Policy LNPI5 should be for non-strategic development only.</u></p> <p><b><u>Objection, LNPI6: Healthcare and Education</u></b></p> <p>5.80. This policy again strikes an overly negative tone and does not plan positively. In line with previous comments, there is little to no positive acknowledgement or appreciation of the planned improvements through the WA allocation, which therefore creates a misleading picture of the Parish. The comments which the LNP gives credence to under reasoned justification also do not appreciate the new infrastructure which</p>

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		<p>is planned either, which could mislead. The following points in this policy need rewording:</p> <ul style="list-style-type: none"> <li>• ‘There is no longer an NHS doctors surgery in Lovelace’ - <u>a GPs surgery will be provided in the WA strategic allocation.</u></li> <li>• “The nearest primary school is in Send, Pyrford, Clandon and the Raleigh” - a new primary school will be provided through the WA strategic allocation.</li> <li>• The nearest senior schools are George Abbot in Guildford - a new secondary school will be provided through the WA allocation.</li> </ul> <p>5.81. Comments in the reasoned justification which describe an absence of new primary schools or healthcare should either be corrected or removed as they do not represent what is planned through Policy A35.</p> <p>5.82. <u>Change Required:</u> This policy is misleading, inaccurate, and conflicts with the strategic allocations. The matter of healthcare and education provision is covered by the GBLP policy framework, and it is not clear why Lovelace needs a wholly separate policy. <u>This policy should, therefore, be deleted.</u></p>
LNP19/56	Savilles	<p>[Part 4 of 4]</p> <p><b><u>Section 8 Business and Employment</u></b></p> <p><b>Objection LNPBE1: Business and Employment</b></p> <p>5.83. In line with the comments made above, this section of the Plan demonstrates an absence of appreciation and no acknowledgement of the proposed employment and retail development proposed at Wisley Airfield new settlement, which has the potential to provide wider benefits to the communities within</p>

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		<p>the NP area, and make up for recent losses identified. WPIL, therefore, object to this.</p> <p>5.84. <u>Change Required</u>: The plan should accurately reflect the GBLP, notably those strategic measures outlined by Allocation A35 and proposed by the Infrastructure Delivery Plan. The following paragraphs should be added to this policy:</p> <ul style="list-style-type: none"> <li>• <u>“Strategic Allocations within the GBLP including at Wisley Airfield and the GBC Infrastructure Delivery Plan, include requirements to deliver retail and employment development. At WA specifically, a new local centre will be delivered providing new retail and employment floorspace, this will provide local services and new jobs. The delivery of this will improve access to retail facilities and employment in the local area.”</u></li> <li>• <u>“Policy LNPI5 should be for non-strategic development only.”</u></li> </ul> <p><b>6. Conclusion</b></p> <p>6.1. The principal objections to the LNP are as follows:</p> <p>6.2. In its current form, the LNP should not progress to a referendum as it is not consistent with the GBLP and is unsound. The NP Group had the opportunity to address these concerns at Regulation 14 stage and formulate a plan which supported the GBLP and its strategic allocations. It regrettably has not chosen to do so.</p> <p>6.3. The LNP includes a significant amount of text which is not considered to be relevant to the LNP or its policies. This should be refined to ensure that the LNP does not include information which is not relevant to the Plan itself. The LNP should be focused on policies to regulate the use of land, and to cause an affect. Background detail can be left to supporting documents;</p> <p>6.4. There is reference to Wisley Airfield as “Three Farms Meadow” (TFM) and a generally negative tone in the LNP in respect of this strategic development which is a key part of the GBLP. As, on adoption, the LNP</p>

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		<p>will form part of the development plan for the area it is not appropriate for such a tone to be adopted within the Plan. TFM is not an officially recognised name, and reference to it will simply cause confusion and risk ambiguity - all references to it should be changed to Wisley Airfield (WA);</p> <p>6.5. The Plan is selective when mentioning the WA strategic allocation. For example, potential improvements to infrastructure, schooling and roads are left out and the Parish described without any acknowledgement of these changes. As the strategic policies will deliver during the plan period, they should be accurately mentioned so the Plan remains accurate and in date.</p> <p>6.6. The LNP does not recognise that the Guildford Local Plan is adopted, and should be written in light of this. Notably, the Judicial Review of the GBLP was dismissed by the High Court on 4th December, and as such reference to the 'challenged adopted GBC Local Plan' in the LNP should be revised.</p> <p>6.7. In respect of the housing and transport policies within the LNP, these are not clear and do not relate to strategic sites allocated within the LNP by the GBLP. It must be made clear that the majority of the LNP does not (and cannot) affect the strategic designation in Policy A35 at the Wisley Airfield; and 6.8. In respect of some environmental policies within the LNP, a greater appreciation of the evidence base and findings from the Wisley Airfield Appeal Decision/ Inspector's report into the GBLP is required.</p> <p>6.9. The plan makes outdated comments regarding to the Green Belt, being '100% Green Belt' despite Ripley, north of East Horsley and WA being no long washed over. The plan should recognise this, and seek instead to influence non-strategic development within these new non-Green Belt areas.</p> <p>6.10. Certain policies within the LNP conflict with their reasoned justification to create a pre-determination of the policy or set a set of circumstances which would be unable to achieve.</p> <p>6.11. Many of the policies within the LNP are subject to there being 'no significant additional traffic/do not increase car use etc.' This wording is overly prescriptive and does not comply with Paragraph 109 of the NPPF: "Development should only be prevented or refused on highways grounds if there would be an</p>

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		<p>unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." It is not sustainable or achievable for policies to require no increase in traffic movements.</p> <p>6.12. Fundamentally, it must be made clear within the LNP that it is non-strategic and that its policies, therefore, do not relate to the strategic allocations within the LNP area. The LNP must not constrain development that is set out in the GBLP. The LNP should, therefore, be redrafted and further consultation undertaken.</p> <p>6.13. As currently drafted, the LNP does not meet the Basic Conditions a) and d), and as such would be found in unsound should it proceed to Examination. In order to be found sound, the LNP will need to address the matters raised within this representation, and ultimately support the delivery of the Wisley Airfield which is allocated in the GBLP.</p>
LNP19/6	Southern Water	<p>Thank you for your email however I confirm that Southern Water is not the statutory water or wastewater service provider in any part of Guildford Borough.</p> <p>We therefore have no comments to make on the Lovelace Neighbourhood Plan.</p>
LNP19/7		<p>What a long-winded process just to make comments, I am sure this will put many people off.</p> <p>I have been involved with producing the Lovelace Neighbourhood Plan, which was public-opinion led throughout.</p>

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		<p>My own opinion is that Lovelace should provide housing for its local needs and some of the borough's need, but not 20-25% of the borough's housing need as proposed by Guildford Borough Council. That is totally disproportionate to this rural part of the borough, its facilities and poor infrastructure. I agree with the Lovelace Neighbourhood Plan that developments should be proportionate in size to housing in the surrounding area, as should density and massing. I agree with the Plan in supporting small developments, particularly those that cater for local need, and I agree with the Plan in not supporting very large, disproportionate, developments in rural Lovelace.</p> <p>Although it is a legal requirement, I do not agree that a Suitable Alternative Natural Greenspace must be provided for very large developments as this appears to support very large developments. For example, the former airfield is within very easy walking distance of the Thames Basin Heath Special Protection Area. Such easy access to the TBHSPA will severely increase recreational use, adversely damaging this sensitive environmental location.</p> <p>I agree with the Plan that all developments should be sustainable locations, i.e. where car usage is not essential for most journeys. Due to its rural and isolated nature car usage will inevitably increase substantially. The targeted increased membership at the RHS, the A3 junction construction traffic and any new housing will severely increase traffic in Ripley and on the local and strategic road network.</p> <p>The GBC proposal to provide a 4-way interchange outside Lovelace, at Burnt Common, Send, to 'relieve traffic through Ripley' is a total nonsense and does not benefit Lovelace. Traffic will travel through Ripley from Ockham roundabout to access Burnt Common, and back again. The majority of Ripley residents, myself included, are very aware and fearful of a severe adverse increase in traffic congestion during rush hour, traffic speed outside rush hour, increased carbon emissions in residential areas and an increase in already proven poor air quality. Ockham roundabout needs to be a 4-way junction to manage its future severe increased traffic to avoid a severe detrimental effect on local roads in the area.</p> <p>I agree that buses to Woking station must be provided in perpetuity to reduce traffic to the most popular railway station in the area. I am not happy that facilities within Ripley village could become so swamped that locals must fight to use them. Ripley village just cannot take a severe increase in parking need or a massive</p>



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		<p>increase in demand for its local facilities.</p> <p>I fully support the Lovelace Neighbourhood Plan which, from discussions with individuals over 4 years, accurately represents the majority views from the communities in Lovelace.</p>
LNP19/8	Send Parish Council	Send Parish Council Planning Committee support the policies and approach of the Lovelace Neighbourhood Plan
LNP19/9		<p>I am in agreement and accept the Lovelace Neighbourhood Plan. I also appreciate the amount of work necessary to align with Guildford's Local Plan which has only been in place for a short time and was changing/developing over the time that the Lovelace Plan was being written.</p> <p>With GBC's major developments in our area I don't believe we need any additional homes in Ripley. It is quite obvious from research done that the population wish Lovelace to remain villages.</p> <p>My concern is the lack of infrastructure required to support a massive increase of population in the NW of GBC's Local Plan area. This is out of the remit of a Neighbourhood Plan so GBC, SCC and the strategic road planning for the M25 and A3 need to consider that each new home will probably have a minimum of 2 cars as public transport for commuting is nonexistent in our area.</p> <p>Thank you to the Lovelace team who stuck with writing at a difficult and changing time.</p>

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