

This Statement inevitably contains elements of repetition from my earlier representations because

successive draft local plans contained new material and omitted earlier material. This was particularly the case in relation to site allocations and to alterations to Green Belt boundaries which under NPPF paragraph 83 require exceptional circumstances.

Such exceptional circumstances should be clearly stated, see *Carpets of Worth Ltd v Wyre Forest*

DC (1991) 89 LGR 897, CA. Far from stating the exceptional circumstances in relation to the actual amendments, the Council merely states at paragraph 4.3.16 that it considers that exceptional

circumstances exist. A generalised need to facilitate development is not logically an exceptional circumstance. Suitability simpliciter is not exceptional, see *Calverton Parish Council* [2015] EWHC 1078.

The Site Allocations at A25, A43, A43a and A58 will all have a substantial adverse impact on the

on the A247 through West Clandon, the whole of which village is in the Green Belt.

Although the Site Allocation at 77 in the 2014 Draft Plan was dropped in the 2016 and subsequent plans, the matters raised in paragraphs 3 to 17 and 22 onwards of my response in 2014

together with the photographs then enclosed remain highly relevant.

The additions of A43 and A43a will clearly add materially to the level of traffic through West Clandon with an adverse impact on the Green Belt. No details have been provided as to how the “all movements junction” referred to at Infrastructure Requirement (2) at page 187 of the Submission Local Plan could be achieved in practice given the distance between Gosden Hill Farm and Garlick's Arch. The traffic problems on the A247 and its connection with the A3 will be further exacerbated in the event of any development following the inseting of HM Prison

Send from the Green Belt ( paragraph 4.3.15) since Tithebarns Lane at Garlick's Arch

(page 230) leads from Ripley Road on which the prison is situated.

An overview of the proposed amendments to the Green Belt shows a clear extension of urban sprawl from Burpham in the Guildford urban area through Gosden Hill (page 352), to Send Marsh/Burnt Common (page 372) which at Kiln Lane is little separated from Ripley with ribbon development along both sides of Portsmouth Road (the old A3). Send Marsh has a minimal separation from Send (see pages 371-2).