

# Guildford Borough Council Local Plan

## Response to Main Modifications

Send Parish Council (ID: 15667489)

October 2018

## **Main Modifications Guildford Local Plan**

### **Representations from Send Parish Council (ID: 15667489)**

#### **Background**

Send Parish Council has made representations throughout the Local Plan process and appeared at the Examination in July 2018. This involvement has largely focused on the allocations made for housing and employment purposes within the parish of Send.

Send Parish Council wish to make further representations in response to the Main Modifications, which propose a number of changes to the plan that have an impact on Send parish. These changes are:

- an increase in the number of homes on the Garlick's Arch allocation from 400 to 550 (MM41);
- the addition of policy requirements to mitigate the effect of development at Garlick's Arch (MM41);
- an increase in the minimum size of the industrial allocation at Burnt Common warehouse, London Road (MM42)
- the allocation of the land west of Alderton's Farm, Send Marsh Road, for 120 homes (MM44).

#### **Context**

##### **Housing Projections, September 2016**

Much of Send Parish Council's concerns and representations over the duration of the Local Plan's preparation have centred on the level of development proposed in the parish as a relative proportion both of that across the borough and in relation to other parishes in Guildford. Send Parish Council have consistently questioned the reasons why Send has been thought of as a suitable location for development, given its lowly position in the hierarchy of suitable sites for development, surrounded by green belt<sup>1</sup>.

The Examination explored this further and, based upon the evidence available at the close of the Examination, it seems apparent from the Main Modifications that the distribution of housing sites across the borough, including the sites at Send, remain appropriate in the view of the Inspector.

#### *ONS projections*

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<sup>1</sup> As 'villages inset from the green belt', Send and Send Marsh are at the bottom of the spatial hierarchy, defined as Tier 10 within the Sustainability Appraisal. This tier provides 5% of the overall supply, but the Garlick's Arch site accounts for around 2% of Guildford's supply. Send parish accounts for 56% of proposed development supply in villages (based on the table at MM2).

The release of the Office for National Statistics (ONS) projections in September 2018, following the close of the Examination, has thrown many of the assumptions about household growth (and therefore need) into question across many local authorities.

Particularly, in the case of Guildford Borough, the ONS figures predict that Guildford would have an additional 4,662 households by the end of the plan period, compared to the previous forecast of 7,717 new households. Guildford could now expect to have around 5,500 fewer households at the end of the plan period that was predicted by the data that formed the basis of the debate at the Examination.

The decrease in the number of homes required within Guildford has serious implications for the distribution of housing land and for the housing strategy more generally. As Send parish is expected to take a particularly high proportion of homes for a rural village, the Parish Council believes that the lower expectation of household growth provides an opportunity to think again about the sites that are essential and which should be amended or removed to in order to maintain the character of the settlements within the parish.

This changed context provides an underlying reason to challenge the changes proposed for Send parish through the Main Modifications.

Further, in light of the changed context in respect of housing requirements, some elements of the new text – for instance those parts of para 4.1.10 in MM2 referring to ‘step changes in housing requirement’ already seem out of date.

### **Main Modification 41**

In light of the changed housing requirements discussed above, the Parish Council is of the view that the allocation at Garlick’s Arch is no longer required. It is recognised, however, that the Main Modification relates only to the increase in residential units at the site, and the Parish Council object to this on the same basis. Increased numbers of housing also brings greater pressure on roads and other infrastructure and village services, particularly schools and health services. It is still not clear in the plan how this will be addressed.

The Parish Council welcomes the acknowledgement, in the addition of wording at MM41, of the argument that Garlick’s Arch is poorly related as a site to both the existing built form of the villages and the services provided by Send. The proposed wording begins to address this by seeking clarity over the provision of transport infrastructure at this site.

Whilst criteria (a) to (c) are fairly clear, (d) and (e) are not. There is no question in the Parish Council’s view, that non-vehicular connections to the village (as well as Burnt Common and Clandon) are necessary if any strides are to be taken towards

sustainability and integration. The inclusion of 'proportionate' implies that necessary mitigation may not be provided in full by the developer, which raises the prospect of full mitigation not being achieved; indeed the risk that no mitigation occurs because of the absence of all of the funding required to achieve it is a distinct possibility. The Parish Council is concerned at the lack of certainty presented in the plan regarding this and would seek further clarification. It is noted that Appendix C contains no modifications in respect of this.

Criteria (e) is vague. The wording is open to interpretation. It is not clear which 'otherwise adverse material impacts on communities and the environment' the plan has in mind and therefore provides no certainty to the developer or the community, and no basis for the Council to assess the extent of contribution (necessary and proportionate or not) that may be required.

## **Main Modification 42**

The Parish Council objects to the increase in the minimum floorspace at Burnt Common warehouse. The Parish Council is concerned about the open-endedness of the industrial allocation at Burnt Common. The allocation is insufficiently precise, and the consequences to the settlements and their infrastructure cannot be measured. Further, the uncertainty about the quantity of development makes good place-making, and consideration of complementary land uses, more difficult.

Particular concern relates to the ingress and egress of commercial and other traffic from the site. The existing junction of Portsmouth Road with the A3 slip road is presently extremely dangerous, even with limited traffic movement. A complete redesign of this junction should be made a specific requirement if you are minded to include the site.

The Parish Council welcomes the acknowledgement, in the addition of wording at MM42, of the argument that Burnt Common warehouse is poorly related as a site to both the existing built form of Send and the services provided by it. The proposed wording begins to address this by seeking clarity over the provision of transport infrastructure at this site.

Whilst criteria (a) is fairly clear, (b) and (c) are not. There is no question in the Parish Council's view, that non-vehicular connections to the village, Garlick's Arch\* and Clandon are necessary if any strides are to be taken towards sustainability and integration. The inclusion of 'proportionate' implies that necessary mitigation may not be provided in full by the developer, which raises the prospect of full mitigation not being achieved; indeed the risk that no mitigation occurs because of the absence of all of the funding required to achieve it is a distinct possibility. The Parish Council is concerned at the lack of certainty presented in the plan regarding this and would seek further clarification. It is noted that Appendix C contains no modifications in respect of this.

Criteria (c) is vague. The wording is open to interpretation. It is not clear which 'otherwise adverse material impacts on communities and the environment' the plan has in mind and therefore provides no certainty to the developer or the community, and no basis for the Council to assess the extent of contribution (necessary and proportionate or not) that may be required.

\*Criteria (0b) should include reference to links to Garlick's Arch and not Burnt Common warehouse. This would be consistent with MM41, reflecting the need for links between Garlick's Arch and Burnt Common warehouse.

### **Main Modification 44**

The inclusion of the site at Alderton's Farm, Send Marsh is a new allocation within the parish, in addition to those already identified at Clockbarn Nursery, Garlick's Arch and Winds Ridge. This site has not had the benefit of thorough testing through the Local Plan process, having been excluded after the 2014 consultation. In light of the changed housing requirements discussed above, the Parish Council is of the view that this allocation is no longer required, and registers an in principle objection.

This plot is currently used as pasture. It forms a natural, picturesque, wildlife corridor between Send Marsh and the heart of Send village, and is a haven for many forms of wildlife, including many bird types and deer. The land has had a tendency to flood, with the run-off from this affecting nearby properties adjacent to the site. Development of this land would mean a loss of openness for the area and removal of the current natural and attractive separation between Send and Send Marsh.

The allocation currently comprises of green belt and, whilst the green belt in this location may be less intrusive than other locations, its loss represents further erosion of the green belt around Send and Send Marsh, erosion in addition to the existing allocations made, some of which are being intensified through the Main Modifications. The overall impact of green belt erosion around the parish is significant and has not been comprehensively assessed.

The Parish Council believes that the wording within MM44 offers insufficient guidance and comfort as to the form of development and the requirements that would be sought to integrate development both within its immediate context or within the wider parish. The wording in the requirements is unclear as to what is sought; terms such as 'sensitive', 'significant' and 'unacceptable' provide little direction (and therefore comfort) in achieving a scheme that respects the elements – such as the site boundaries, transitions between village edge and open countryside and hedgerows – that are recognised as worthy of protection and attention. If 'no unacceptable impact' is the objective in respect of trees, for instance, is some impact acceptable? And if so, what?

As discussed with other allocated sites in Send, Alderton's Farm is also distant from the village centre, and the location of most services on Send Road to the west, and access to it along Send Marsh Road is not always conducive to non-vehicular transport, such as walking or cycling. If we are to achieve a reduction in car use in the parish, particularly to and from services within the parish for residents, any allocation that remains in the plan needs to have a series of transport related conditions to ensure that contributions and facilities can be put in place to provide alternatives to short car trips, as has been the case with other sites (see MM41 and MM42 in particular). This should include physical connections such as improved pavements, cycle lanes and better crossings alongside initiatives such as more frequent bus services and reduced speed limits.

A further allocation of 120 dwellings within Send also places additional pressures on existing services within Send, which the Main Modifications do not address. During the Examination, the position in respect of Send and Ripley's Primary Schools was discussed, as well as the extent to which Send's Medical Centre could accommodate growth.

The wording at (2) in the Opportunities section of MM44, therefore, is weak and vague.

Finally, within the 2014 Plan, when the site was allocated, a SANG was identified adjacent to it which was capable of delivering recreational opportunities to residents, and this proposal was acceptable to Natural England. If the allocation is to find favour, the Parish Council would expect a reference in the plan to a similar provision of SANG to be available for current and future residents.

### **Traffic implications of additional development introduced by the Main Modifications**

At present the Parish Council is working with Surrey Police, Surrey County Council Highways and the local school and medical centre on Send Barns Lane to develop options to deal with the significant highway problems (speeding, volume, parking, pedestrian / cyclist safety) in the village. The A247 is presently a very busy road and this should be considered before local plan allocations are brought forward.

Send Parish are unclear on the cumulative traffic implications of the concentrations of development being proposed by MM41, MM42 and MM44. It is noted that the landowner at Garlick Arch considers that there are benefits to be had from the slip roads in terms of the impact upon the A247, particularly in respect of southbound movements. It is not clear where this southbound traffic is redistributed to. The benefits to Ripley are evident as traffic is redirected to the Burnt Common junction; the benefits to Send seem intuitively less apparent.

Additional housing at Garlick's Arch (MM41) and a new site at Alderton's Farm (MM44) cause further concern. It is not clear whether the impacts of an open ended industrial

allocation at Burnt Common (MM42) have been factored into this traffic assessment, or indeed whether other smaller housing allocations and the traffic expected of the expanded Strategic Industrial Location at Tannery Lane within Send have been modelled. Notwithstanding some new references to transport strategy at Garlick's Arch and Burnt Common warehouse, the absence of alternatives to the car bring into question the overall strategy and approach to the parish.

The Sustainability Appraisal raises this directly; it recommends that clarification be made regarding the risk of severe traffic congestion in Send (para 10.4.6) without really explaining how this fear arises (beyond the extent of development proposed) and without a clear indication of where the recommendation has been actioned within the plan or the plan-making process.

Work must be undertaken to determine the additional cumulative highway impacts of all the development in the parish (on all roads infrastructure), having regard to the overuse of the existing road infrastructure.