

Guildford Local Plan Examination

Summary of discussion, Wednesday 4th July 2018

Send Parish Council was invited to attend the round table discussion at the Guildford Local Plan Examination on 4 July 2018. The discussion centred around the housing allocation at Garlick's Arch, south of Send Marsh, but also covered the allocation at Burnt Common for employment uses and context within Send Parish generally.

The Inspector defined the agenda and discussion points:

Send Marsh, Burnt Common and Garlick's Arch (A43, A43a, A58)

- a) The exceptional circumstances for the release of these particular sites from the Green Belt;*
- b) The landscape and design strategy for the site, having regard to the relationship of the site to the village and its location in relation to other allocations at the eastern approaches to Guildford;*
- c) The transport strategy and measures to mitigate traffic impacts on nearby roads and communities;*
- d) The mechanism for delivering the slip roads.*

Guildford Borough Council (GBC) made the case for site allocations in Send parish based upon the Green Belt and Countryside Study, which had identified Garlick's Arch and Burnt Common as potential major development areas (PDMA). GBC argued that local circumstances for the release from the green belt included the delivery of the A3 slip roads (required to mitigate traffic generated by the Wisley allocation), the option to bury the overhead electricity wires, the relative containment of the site and the possibility of landscape mitigation on the A3. It argued that transport and traffic from developments could be mitigated, and that development at Garlick's Arch could be integrated with the villages of Send Marsh and Send. The allocation at Burnt Common was to meet a strategic employment need and not a local employment need. This land was well

contained and already contained both existing industrial uses and previously developed land.

The Inspector sought to explore these reasons and heard arguments both in favour of the site and its development from the landowners and their representatives, and from those who questioned the development, principally made up of local community groups, parish councils and pressure groups.

There were a number of interlinked discussions, based upon the Inspector's questions (a) to (d) above. This note covers some of the points made. Send Parish Council produced an Examination Statement which formed the basis of the arguments put at the session. The Inspector will make final decisions and recommendations in his report and nothing should be implied from the following about the outcomes and decisions the Inspector may make in future in his report. This is provided only as a summary of the issues discussed and presented from both sides.

Green Belt

- The Garlick's Arch site is situated in a green belt area of medium sensitivity. The green belt safeguards the openness of the landscape and is key to preventing further urban sprawl. The strategic exceptional circumstances for release of green belt in Guildford are understood and clear; the local circumstances in Send – a tier 10 settlement – is less apparent. The Inspector did not consider the slip roads or the power lines as constituting exceptional circumstances.
- The land is due to be released from the green belt to make space for the development. However, within the sustainability report it stated that, 'development should be avoided wherever possible on medium and high sensitivity green belt land'.
- The residents' association and parish council members struggled to see the benefits to the community, and justification of using green belt land.

Landscape and Environment

- From a landscape perspective, residents' associations and parish council members expressed concerns, including:
 - The view of the Garlick's Arch site (and hence new development) from the South Downs.
 - The ancient woodland located in the main site allocation. Residents are concerned the woodland may be adversely affected by the new development – particularly regarding the health of the trees and associated biodiversity and wildlife.
 - There were points raised regarding the risk of flooding in the area, which stemmed from the fact that parts of Send and Send Marsh sit on Flood Zone 2 and 3 – indicating a medium to high risk of annual flooding. There would therefore need to be further discussion regarding

reducing surface water run-off and minimising flooding risks, and the implications for surrounding areas.

- The landowner's landscape architect (represented by Barton Willmore) sought to assure the Inspector that all appropriate measures would be taken regarding flooding, the ancient woodland, and screening the new development to minimise visual interference from surrounding viewpoints.

Land Use

- Concerns were raised regarding the provision of 6 pitches for use by travelling show people. The argument made was that these sites (by the nature of the show people's work) would be unoccupied for several months each year whilst the groups travel.
- Questions were raised about the land allocations for industrial use at Burnt Common. Residents argued that the existing units have been vacant for a number of years, and have not been contributed to local employment or economic development. The developers responded, giving reasons for the current unoccupied units and stated that they had since received considerable interest from business owners looking for new premises. There were still reservations from residents regarding the demand for these renovated industrial units.

Housing Needs

- A great deal was made of the site having been chosen because of its ability to meet housing need earlier in the plan period (thus boosting supply and addressing affordability), and not necessarily because the site was most suitable. GBC responded saying that borough targets had to be met to address the housing shortage. GBC also confirmed that new infrastructure could be ready to ensure early delivery of the scheme – this included the undergrounding of pylons and road network adjustments.

Integration with existing communities and facilities

- The integration of the new development with existing communities and facilities at both Garlick's Arch and Burnt Common was questioned on several occasions.
- The language from the landowners emphasised the self-containment of the site, which it was argued was not conducive to integration with the existing settlements.
- With the linear and somewhat scattered nature of existing settlements, there is concern that the new development may not sit cohesively in its surroundings. The urban form of Send Marsh faces away from the proposed site, and the allocations are not physically close to the main clusters of services in the Parish. The developers and the Council argued that connections could be made through better public transport and crossings to Portsmouth Road / the A247.
- A question was raised regarding the capacity of the sewer network and whether the increased demand from the new development had been considered. GBC stated that they had been in talks with Thames Water regarding this matter and that the increased demand could be accommodated with relevant upgrades to the water network.
- Further to the infrastructure concerns, residents' associations extended doubts about the already oversubscribed Villages Medical Practice on the A247 in Send. Parking and resources are already stretched, and the extra demand placed on the centre from an additional 550 units could compromise health service standards. GBC responded saying that they had been in talks with Surrey County Council to expand the site to meet needs.
- Additional problems were raised in respect of the capacity for primary education. The nearby Ripley Church of England Primary School is currently facing closure, and the knock-on consequences mean that this pressure will fall onto Send Primary School. This will require a 'bulge' class to be formed in Send Primary School, adding an extra 30 students to each year

group over the next 5-6 years – a strain which critics say will compromise the quality of education provided. GBC said they had undertaken school-based planning with representatives from the County Council to explore expansion options. Primary schools further south in Gosden Hill may also be used to accommodate any extra demand.

Traffic

- Many of the concerns expressed by critics of the allocations centred around the proposed changes in the road network and associated traffic issues:
 - A3 – The A3 and many local roads already suffer from severe congestion, and enhanced access to the villages via the proposed slip roads, as well as new homes, will only compound the problem. This is emphasised by the plan to improve the A3, expanding capacity and improving junction safety, as set out in the Government’s Road Investment Strategy (RIS). Whilst the benefits of the new slip roads are apparent for Ripley (the village will no longer be used as a shortcut to the Wisley and the M25), the benefits to Send seem much less clear.
 - Local Roads - The local roads (particularly the A247) are already highly stressed during peak times and other times, including school drop-off and pick-up. In West Clandon, it was highlighted that even at the current traffic levels, two HGV’s are unable to pass through the village centre without mounting the pavements – causing a serious danger to pedestrians who use the footpaths. There are currently no mitigation methods in place for the traffic problems in this area. In addition to this, GBC and NHS are already in talks to expand the car park at the Villages Medical Practice without any additional development. Send Parish Council are working with partners to alleviate current recognised problems with the road.

- The promoters of the site, and GBC, could draw on transport modelling done for the site and the wider area which they argued had considered several proposed developments in Send parish and the impact of this upon the A247.

Noise and Air Pollution

- The nitrogen dioxide levels measured at Burnt Common recorded a Category 4 output in the Health Impact Assessment – a concerning level for a small village.
- There was concern over the current noise levels alongside the A247, without additional development. There were also questions raised about the measures to be put in place to screen the new development and reduce noise impacts.

Public Transport

- The dispersed nature of the villages is not necessarily conducive to an efficient public transport system, however the linear nature of Send along the A247 could suit a bus service – if reliable and regular. This service, which was available for some time, was then discontinued due to lack of demand. However, to reduce reliance on cars, and to encourage more active lifestyles, GBC do want to push for the reinstatement of a reliable bus service – particularly to transport hubs such as the railway station in West Clandon. Questions regarding whether the roads would have to be widened to facilitate this were not explicitly answered. Concerns justifying the demand for a new bus service were also not answered.
- GBC stated that they aim to improve the local public transport network, as outlined in their Transport Feasibility Strategy – including exploring options to implement a Park and Ride Scheme.

Cycling and Walking

- GBC argued that there are already good cycling/walking provisions in the area – a claim countered by residents associations and the parish councils. To highlight this, they drew upon the Ripley - Send cycle lane, currently classified for use by 'experienced and confident cyclists only', as cars pass through narrow streets often at high speeds. This danger is not encouraging new cyclists to take to the roads and travel (often short distances). This issue will only be solved by raising the priority of cyclists and pedestrians, and changing attitudes to car use. Furthermore, the infrastructure must be in place to facilitate a walkable, permeable and well connected settlement.
- GBC responded by outlining their aims to improve cycle lane and cycle parking as mentioned in the Transport Feasibility Strategy. One example is to enhance the cycle parking availability at West Clandon railway station, hopefully encouraging more people to cycle.

Overall the inspector spent a long time negotiating topics relating to transport and was concerned about how the transport issues were explained in policies.

Next Steps

The Examination hearings concluded on July 5. The Inspector may undertake further site visits following the hearings, but he is very unlikely to take any further representations. During the Examination, modifications to the plan will have been suggested and discussed. The next stage of the process will involve further consultation on the main modifications to make the plan sound (minimum six weeks). GBC will set out a timetable for this and will liaise with the Inspector on the drafting of main modifications. At this stage, it is difficult to know exactly how long this may take.

The Inspector's Report will not be finalised until the completion of consultation on any main modifications proposed to make the plan sound.