

Guildford Borough Council Local Plan

Hearing Statement

Send Parish Council (ID: 15667489)

May 2018

Further Representations Guildford Local Plan

Representations from Send Parish Council (ID: 15667489)

Background

Send Parish Council has made representations to the Submission Local Plan (July 2016 and July 2017). These have largely focused on the allocations made for housing and employment purposes within the parish of Send.

Send Parish Council wish to add further comment following the issue of the Inspector's Matter's and Issues and the Council's response to the Inspector's Questions, dated 10 April 2018.

9. Spatial strategy, green belt and countryside protection

9.2 Having regard to the need for housing, does the plan direct it strategically to the right places?

In considering the spatial strategy, Send Parish Council have found difficulties in relating the distribution of housing set out in Question 4 Appendix One of the Council's response to the Inspector's Questions to the summary table in the site allocations policy of the Submission Local Plan. There appears to be no clear correlation between the locations in the table and the sites in the summary table. This also appears not to clarify 'how much housing development is expected in the different settlements', as asked in Question 4.

Send Parish Council questioned the distribution of housing, and the disproportionate allocation to Send parish within its July 2016 comments.

The largest village allocation, Garlick's Arch, was not identified through the Green Belt and Countryside Study (GBCS) as a potential development area, but was identified with land north and south of London Road at Burnt Common as a Potential Major Development Area. This is addressed further under Issue 11, below (see 11.35).

9.3 Are the proposed new business land and floorspace allocations in the right strategic locations?

Send Parish Council set out in its July 2017 representations why it did not feel that Send Business Centre warranted strategic employment site status and insetting from the green belt, owing to its size, location, characteristics and non-strategic nature.

Send Business Centre is within a parcel of high sensitivity green belt (parcel B16, GBCS, Volume II Addendum). The area was discounted as a PDMA partly because of:

- ‘the openness of B16-A...evident from Tannery Lane near Send Business Centre’, and
 - ‘the openness of land to the north of Send within the surroundings of Send Business Centre’.
- (GBCS, Volume V, Section 21).

Question 8 Appendix Three of the Council’s response to the Inspector’s Questions now considers Send Business Centre as a major previously developed site within the green belt. Send Business Centre is much smaller than other sites similarly categorised. Send Business Centre was not considered as a major previously developed site in Volume V of the GBCS, (and no definition is offered within the GBCS). Appendix Three offers no new insight, as much of this text comes from the Employment Topic Paper.

11. Site allocations

A43, Land at Garlick’s Arch, Send

A43a, New North-facing Slip Roads on the A3

A58, Land adjacent to Burnt Common Warehouse, Send

11.34 Are there local exceptional circumstances that justify the release of this land from the Green Belt?

In combination with the allocation at A25, Gosden Hill Farm, (see 11.14 above), is there a risk of a significant diminution of the Green Belt in this locality?

Can the perception of the eastward sprawl of the wider Guildford urban area along the A3, and the encroachment into the undeveloped gaps, be avoided?

Local exceptional circumstances

The parish council understands the strategic exceptional circumstances that are focusing the Council on green belt locations to meet objectively assessed needs for employment and housing needs.

However, we remain unclear on what the local exceptional circumstances are; the unique characteristics of the allocations in Send that make them preferable to other locations and justify the loss of green belt. Based on Appendix 5 of the Council’s response to the Inspector, the site at Garlick’s Arch seems predicated on the delivery of the slip roads to the A3, whilst the Burnt Common Warehouse appears convenient to Garlick’s Arch in off-loading the employment element. What makes it locally exceptional to overcome the strong protection of green belt remains unclear.

Diminution, encroachment and perception of sprawl

The allocation of sites at Gosden Hill, on the eastern side of Guildford, with the two allocations on the north side of the A3 at Send would, in our view, give the perception of eastward sprawl and encroachment into the currently undeveloped gaps between Guildford and Send. Development would exist on one side of the A3 or the other between Guildford and Send, except for a small break at Nut Hill.

Whilst mitigation could be expected along the A3, this would take the form of landscaping that would compromise the openness of the gap, one of the two characteristics of green belt set out at para 79 of the National Planning Policy Framework (NPPF). It should be noted that the sense of openness should not exclusively be assessed from the A3.

The Council imply the reduction of the perceived coalescence between Send and Gosden Hill twice within their response to the Inspector's Questions (paras 8.90 and 8.91), but it remains unclear as to how this is achieved with the Gosden Hill allocation and the separation of the employment element of Garlick's Arch allocation back into Burnt Common. The allocations made in the 2017 Version of the Plan appear to weaken the case over coalescence rather than strengthen it, by virtue of the reallocation at Burnt Common.

There also appears to be no strategic / cumulative assessment of the impact of de-designating green belt where these happen in close proximity, such as within this part of the A3 corridor between Gosden Hill and Burnt Common.

The Inspector asks whether such diminution (reduction in size, extent or importance) would be 'significant'. Except for the triangle between Potters Lane and Vicarage Lane (low sensitivity), the green belt in this area is of medium or high sensitivity. The proposed removal of land from the green belt is 98.26ha (with a further 28ha at Garlick's Arch). The distance between areas outside of the green belt between the eastern edge of Guildford and western extent of Send along the A3 will effectively drop from 2.5km to around 700m. For a parish between the urban areas of Woking and Guildford, this change feels significant.

11.35 Would the developments proposed in these allocations integrate with the village or would they be separate entities?

The allocations at Garlick's Arch and Burnt Common Warehouse were examined through the GBCS Volume V as Potential Major Development Areas (PMDAs). Volume V sought to explore major expansion of the most sustainable villages, and justified this approach based on para 52 of the NPPF, an approach explained at para 21.3 and 21.4 of Volume V. It is important to note that such approaches should be achieved with the support of communities.

Volume V concluded that a combination of the Garlick's Arch site, and sites at Burnt Common north and south of London Road (numbered B14-A and B12/B13-B) could

together achieve a critical mass that brought the population of the settlement up sufficiently to support services that enabled satisfactory sustainability to be achieved.

The Submission Plan allocates land at Send Marsh / Burnt Common at a level significantly below this aspiration, with a wholly residential allocation of 400 homes at Garlick's Arch and a separate allocation of employment uses at Burnt Common with no apparent attempt to ensure that sustainability and integration is achieved or services within the settlement are improved. Indeed, it is likely that the services in nearby Send would need to take up some of the additional burden generated by new housing. The separation of the employment and housing elements also suggests that integration with the settlement has not been considered within the plan.

Recent events have suggested that the existing infrastructure is likely to be stretched, even before further housing allocations. The existing health centre in Send, (which serves Send parish and Ripley) is at or beyond capacity with the existing population, and it has been recently announced that the primary school in Ripley is likely to close, giving rise to uncertainty in the area about education capacity. Following a request made by the parish council for a review of traffic on Send Barns Lane (particularly regarding parking and speeding concerns), the police, highway authority and community are to meet in May 2018 to discuss this and work towards solutions where possible. Further traffic generated from new housing would only increase local concerns about traffic and driver behaviour.

The Council's response to the Inspector's Questions suggests, at para 8.36, that achieving sustainability through carefully selected extensions to villages remains a benchmark and, whilst this paragraph specifically applies to extensions within areas of low sensitivity in the green belt, it should surely follow that such a principle should apply to larger extensions to villages in more sensitive green belt areas. Para 8.39 states that such extensions are inappropriate, but attempts to address the allocations in Send Marsh / Burnt Common at Appendix 5. Appendix 5 does not explain how the allocations can achieve integration and critical mass in Send Marsh / Burnt Common, and falls well below the assessment of the PMDA within Volume V of the GBCS. The Submission Plan does not explain this shortfall or the resulting impact on achieving the required critical mass.

The close relationship between the Garlick's Arch site and the new A3 slip roads (set out at para 8.89 of the Council's Response to the Inspector's Questions) also indicates that the site will be well connected to the A3, but less well connected to the remainder of the village and its services.