

Guildford Borough Council Local Plan

Examination Statement

Send Parish Council (ID: 15667489)

July 2018

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Background

The Parish Council has made previous representations to the 2014, 2016 and 2017 Versions of the Plan. These comments are additional to these and reflect matters raised through the Examination where relevant.

Send and Send Marsh / Burnt Common are small settlements within Guildford Borough, but the Local Plan has been significant for its residents because of the range of development proposals that have been directed towards them.

These have included the Garlick's Arch and Burnt Common allocations that remain, but also proposals for expanding the Send Business Centre at Tannery Lane, opportunities identified for housing at Tannery Lane and Wind Ridge and the prospect of the A3 slip roads. Other development at Vision Engineering and the marina have recently been completed within the village. In considering the Inspector's question raised during the inquiry about boosting delivery in the early years of the plan, Guildford Borough Council (GBC) have suggested a further 270 dwellings within Send parish (GBC-LSPP-020).

Send parish has around 4,000 people in c.2,000 dwellings. The one school and one medical centre already serve people beyond the parish. The original proposals within the Submission Plan propose around 500 new homes in the parish – a figure which has increase by 270 in the last week (this equates an addition of 40% on the current number of homes). Garlick's Arch also includes a provision for travelling showpeople. People in the parish have questioned why Send has been so targeted within the plan, how and why this has happened and

what the impact of accommodating an 'early boost' for housing supply in Guildford will mean in the short term for their lives.

The extent of possible – probable – change has engaged residents in a heated discussion about the future of the settlements and the Parish Council recognises and reflects people's concern and fear.

Statement

The Parish Council is realistic about the development pressures within the borough and acknowledges the debate had to date at the Examination and in the context of the production of the plan. New housing – and other development – is required and the Parish Council acknowledges that every part of the borough must undergo the required scrutiny to ensure that the right spatial strategy is followed to secure this.

However, the Parish Council have maintained that the allocations made at Garlick's Arch and Burnt Common are not consistent with a sensible approach to housing distribution and are unsustainable and unhelpful in supporting the organic growth of the settlements in the parish and the local services it offers to the people who live and work here.

There are four main strands to this position.

a) Bottom of the hierarchy

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. The Sustainability Appraisal (2017) considers the Garlick's Arch site as a 'given' but the Parish Council considers that other sources

of housing exist within higher tiers that could meet the borough's needs. Garlick's Arch also provides a third of the housing at this tier and, as such, is a disproportionately large allocation at this tier within the spatial hierarchy.

b) Local exceptional circumstances

The Parish Council's hearing statement set out that it understood the strategic exceptional circumstances that have moved GBC to examine the green belt to meet housing need. However, the locally exceptional circumstances are not clear and must be made explicit. GBC seeks to address the local exceptional circumstances in their response to the Inspector's Questions. The justification for housing appears to be predicated on the need for the A3 slip roads, but these are in themselves no justification for housing development.

GBC's response cites 'limited harm' (para 11.34.1) to the green belt, but the site rises in nature to the south and is part of a visibly open area (i.e not obscured by trees) on the A3 around Send.

In short, the local exception circumstances that justify a housing allocation in this location do not exist.

c) Sustainability – connections, transport, urban form, critical mass

GBC's response to the Inspector's Questions (section 11.35) aims to demonstrate the way in which the allocation would integrate with Send Marsh and Burnt Common. However, the nature of the land and the existing connections to Send Marsh and Burnt Common make this very difficult. Garlick's Arch is not visible from Portsmouth Road, and is separated from it by a wide strip of woodland. Equally, Portsmouth Road is not visible from within Garlick's Arch. There are no public connections between the two and for much of Portsmouth Road, there are no footways alongside the site.

The larger part of Send Marsh, on the northern side of Portsmouth Road, faces away from the road, turning its back on Garlick's Arch. There is no physical or visual connection at all despite a contiguous boundary. There is no clue, in any submission to date, how this barrier can be effectively overcome.

It is the case that some bus services exist along Portsmouth Road, though these are hourly and do not serve Send Barns Lane where the school and health centre are. The bus journey to the parade of shops at Send Lane is indirect. The walking and cycling route is only along the busy Portsmouth Road and the A247. It is dubious that anyone would choose to walk or cycle this route to find the village services in Send (as opposed to Send Marsh, where there are no services) because of the distance but, more importantly, because it is a hostile environment dominated by vehicles travelling at speed.

GBC's response to the Inspector's Questions (para 11.36.3) states that there is an existing network of pedestrian and cycle routes, but this is nothing more than the footways alongside the trafficked roads. These are not separate or in any way primarily for pedestrians and cyclists. Table C of the SA (2017) demonstrates that Garlick's Arch is very poorly related to any of the main services, including the school and the local centre. Send Marsh ranks very low for services and facilities against settlements of a similar size and is dependent on Send for local services (the recent closure of the school at Ripley increases the dependency upon Send of a wider catchment). The SA states Para 10.4.6) that there is, 'little in the way of strategic 'communities' argument' for Garlick's Arch.

However, Volume V of the Green Belt and Countryside examines potential major development on the edge of Send / Send Marsh, including a combination of the allocated land at Burnt Common and Garlick's Arch. It comments that only together can Burnt Common and Garlick's Arch deliver the kind of housing numbers to generate a 'critical mass' (i.e. to provide housing in quantities that

develops and sustains the settlements' services). The implication is that the Garlick's Arch allocation in its present form (and even with additional homes and the addition of Alderton's Farm) is not sustainable and will not help the services in the settlements to prosper.

It must be made clear that Send Parish Council is not advocating the volume of homes set out in the GBCS that would deliver a critical mass and considers that a greater proportion of homes should be found higher up the spatial hierarchy.

d) Wider transport implications

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 around the parish at this time. 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.

GBC's recent suggestions (GBC-LPSS-020) around intensified housing at Garlick's Arch and a new site at Alderton's Farm cause further concern. It is not clear whether the impacts of an open ended industrial allocation at Burnt Common

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. 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.

Addition of Aldertons Farm and a further 150 dwellings at Garlick's Arch

GBC has suggested that the early supply of homes could be boosted by the addition of a number of sites to the plan, including further housing units at Garlick's Arch (raising the capacity to 550 homes, beyond that advocated by the landowner in their submissions) and Aldertons Farm.

The addition of these sites does not mitigate any of the concerns raised here, including that around 'critical mass'. The Alderton's Farm site was included within the 2014 Plan, but has not been included since because it is not in accord with the spatial strategy. The Parish Council made strong comments to the inclusion of this site in the 2014 Local Plan, reflecting local concern.

The Parish Council understands that any new sites recommended for inclusion within the plan as part of your report would be subject to consultation and comment through the Modifications stage.

Burnt Common allocation

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.