

Guildford Borough Council Local Plan: Strategy & Sites (2017)

Proposed Submission Consultation

Representations on behalf of Send Parish Council

July 2017

Contents

1	Introduction	3
2	Proposed Allocations for Housing Provision	4
3	Strategic Road Network Infrastructure Allocations SRN9 and SRN10	5
4	Green Belt Boundary	6
5	Employment Land Allocations in Send, Send Marsh, and Burnt Common	8
6	Residential Land Allocations in Send, Send Marsh/Burnt Common	13
7	Land Allocations in Send: Garlick's Arch	14
8	Summary of Proposed Changes and Conclusions	15

1. Introduction

- 1.01 Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of Send Parish Council. These representations relate to the June/July 2017 consultation of the Proposed Submission version of the Local Plan: Strategy and Sites document, which is open for consultation until Monday 24 July 2017. Representations made by the Parish Council to the Local Plan consultation which took place in 2016 are assumed to remain valid.
- 1.02 This statement challenges the level of proposed housing provision in the parish, and focuses specifically on draft housing, employment and transport allocations in Send, Send Marsh and Burnt Common. It sets out objections to the following issues, designations, and allocations:
- Send Business Centre – inset from the Green Belt;
 - Send Business Centre – designation changed from “Locally Significant Employment Site” to “Strategic Employment Site”;
 - Site A58 – Land around Burnt Common warehouse – “Strategic Employment Site” providing a minimum of 7,000sqm employment floorspace;
 - Site A42 – Clockbarn Nursery, Tannery Lane, Send – 60 homes;
 - Site A43 – Garlick’s Arch (travellers and showpeople)

2. Proposed Allocations for Housing Provision

- 2.01 During the previous consultation in 2016, Send Parish Council set out that it considered the proposed level of housing provision to be unsound due to the number of allocated homes being significantly greater than the identified need. Table 1 of Policy S2 set out the planned delivery of housing between 2018 and 2033. Sufficient allocations were made to deliver 13,652 homes in this period; an average of 910 dwellings per annum (dpa), or 131% of the requirement identified in the SHMA. Paragraph 4.1.12 of the Proposed Submission Local Plan (2016) acknowledged that the number of homes set out in table 1 is greater than the number of homes required by policy S2 and that this is deliberate in order to build in flexibility. This, however, was well beyond the objectively assessed need of 693 dpa or 10,395 dwellings over the course of the plan period.
- 2.02 Send Parish were concerned that this resulted in the allocation of sites that were not suitable for development.
- 2.03 The proposed modifications rely on updated information in respect of housing need in the form of an addendum to the West Surrey SHMA. This has resulted in a reduced requirement; the objectively assessed need has fallen to 654 dpa. As a result, the proposed modifications remove some allocations and reduce the capacity of others. Whilst flexibility remains in the sites listed in the Site Allocations section of the plan, this appears to be at a more acceptable level of 9%.
- 2.04 However, Send parish specifically has not seen any reduction in the demands made upon it to deliver the housing needs of the borough and, in fact, the number of dwellings proposed in the plan has increased. Send parish also sees changes in respect of employment provision, and consequential changes to the green belt. These matters are dealt with in sections 4, 5 and 6 below.

Distribution of housing

- 2.05 Send Parish Council also made comments during the 2016 consultation regarding the distribution of housing with reference to the 2014 Settlement Hierarchy document. There is no further evidence presented in respect of the Settlement Hierarchy in this consultation. Equally, nothing has materially changed in the settlements of Send and Send Marsh / Burnt Common that would warrant an update and, therefore, these comments remain relevant.

3. Strategic Road Network Infrastructure Allocations SRN9 and SRN10

- 3.01 Representations on behalf of Send Parish Council were made as part of the consultation process for the previous version of Guildford Borough Council Local Plan Strategy and Sites (2016), which took place June/July 2016. Included in these representations were objections raised against the Strategic Road Network Infrastructure Allocations SRN9 and SRN10.
- 3.02 These allocations, relating to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road, are to be delivered on the land covered by site allocation A43a. This allocation has once again been included within the Proposed Submission Local Plan (2017), with only a minor amendment related to a slight reduction in the area of the site. Therefore, Send Parish Council's objections related to the A43a site allocation remain. For further information on these objections, please refer to the representations made on behalf of Send Parish Council to the previous draft of the Local Plan, submitted in July 2016.

4. Green Belt Boundary

4.01 Send Parish Council **object** to the following alteration to the Green Belt boundary:

- The insetting of the Send Business Centre and adjacent field from the Green Belt.

The reasons for the objection are set out below.

4.02 The 2014 draft version of the Guildford Local Plan proposed to inset the Send Business Centre from the Green Belt. This proposed insetting of the Business Centre from the Green Belt was included at this time on the basis that it formed a logical extension to the two site allocations located on Tannery Lane. These allocations were as follows:

- Site Allocation 67 – Tannery House and land adjacent to Tannery Lane – B1 employment uses;
- Site Allocation 75 – Land at Tannery Lane, Send (including Clockbarn Nurseries) – C3 uses, 215 homes.

The proposed Site Allocation 67 would have enabled an extension to the adjacent Send Business Centre. During consultation on the 2014 draft Local Plan, Send Parish Council made representations in respect of Allocation 75.

4.03 After consulting on the Local Plan in July 2014, the Council drafted an updated version of the Local Plan. This draft version was submitted for consultation in Summer 2016. In this version of the Guildford Local Plan, the proposal to inset Send Business Centre was removed and the Green Belt washed over the site.

4.04 The Tannery Lane allocation (Site Allocation 67) was removed due to its location within high sensitivity Green Belt. The allocation at Send Business Centre was also removed [see paragraph 4.38 of GBC Topic Paper: Green Belt & Countryside for further details]. In addition to this, residential Site Allocation 75 was also removed from the draft Local Plan, replaced by Site A42. Site A42 allocated 45 homes on the site of Clockbarn Nurseries, a much smaller site than had previously formed Site Allocation 75.

4.05 Despite these reasons for removing the proposal to inset Send Business Centre from the Green Belt, the 2017 draft version of the Guildford Local Plan once again proposes to inset the site from the Green Belt. The area proposed to be inset from the Green Belt is significantly larger than the existing extent of Send Business Centre. In addition to the existing site of Send Business Centre, the area to be inset also includes the Business Centre car park and the adjacent undeveloped site previous proposed in the draft 2014 Local Plan as employment land Site Allocation 67.

- 4.06 Send Parish Council feel that the proposed insetting of Send Business Centre from the Green Belt is unjustified. Firstly, it is unreasonable to expect that the high sensitivity of the Green Belt in this location has altered since the Tannery House site allocation was removed from the 2016 draft local plan for this very reason. In addition to this, the River Wey Navigation Corridor, which sits adjacent to the Business Centre, is designated as a Conservation Area. The openness of this conservation area, and the setting of the River Wey within the Green Belt is an important feature of this high sensitivity Green Belt. Nothing has changed in the last year to the nature of either the Green Belt or the River Wey Navigation, thus it is not immediately clear why Guildford Borough Council have overlooked the ‘high sensitivity’ Green Belt designation in order to inset Send Business Centre and the adjoining land from the Green Belt.
- 4.07 Secondly, the Green Belt and Countryside Topic paper published as part of the evidence base for 2017 draft version of Guildford Local Plan states that the “unique nature of [Send Business Centre] and the existing infrastructure in place means it is considered appropriate for development”.
- 4.08 However, Send Business Centre is a small collection of buildings which enjoys a rural setting alongside the River Wey. It has consistently been regarded as contributing to the openness of the green belt by virtue of the designation washing over it. The existing infrastructure in place at Send Business Centre represents that typical of a Green Belt setting, namely single track roads with passing places and no pedestrian or cycling infrastructure. This does not constitute infrastructure ready to support an area inset from the Green Belt that, following removal from the Green Belt designation, will not be subject to the same restrictions as are currently in place.
- 4.09 No evidence is provided in the literature accompanying the 2017 draft local plan that justifies removing the Send Business Centre and adjacent land from its Green Belt designation. The Parish Council considers removing this area from the Green Belt an unsustainable precedent and could pave the way for significant inappropriate development in a rural area of high sensitivity Green Belt.
- 4.10 The proposed insetting of Send Business Centre and adjacent land is directly linked to the proposed change of designation of the Business Centre from “Locally Significant Employment Site” to “Strategic Employment Site”. Send Parish Council’s representations regarding this change of designation are laid out in Section 5.
- 4.11 Changes sought to make the Local Plan sound
- Remove proposals to inset Send Business Centre and adjacent land from the Green Belt. Restore the green belt wash over Send Business Centre.

5. Employment Land Allocations in Send, Send Marsh, and Burnt Common.

5.01 Send Parish Council **object** to the following proposals related to employment designations and allocations included within the 2017 draft Guildford Local Plan:

- Send Business Centre – designation changed from “Locally Significant Employment Site” to “Strategic Employment Site”.
- Site A58 – Land around Burnt Common warehouse – “Strategic Employment Site” providing a minimum of 7,000sqm employment floorspace.

The reasons for objections are set out below.

Send Business Centre – changed designation

5.02 As discussed in Section 4, the 2014 draft version of the Guildford Local Plan proposed to inset the Send Business Centre and the adjacent employment land, Site Allocation 67, from the Green Belt. The employment land proposed at Site Allocation 67 would have effectively extended the existing Business Centre by approximately 1.4ha. However, despite this proposed enlargement, in the 2014 draft Local Plan Policy 13 did not include Send Business Centre in the list of new Strategic Employment Sites.

5.03 The 2015 Employment Land Needs Assessment [ELNA], prepared as part of the evidence base for 2016 draft Guildford Local Plan, includes Send Business Centre in its list of Non-Strategic Employment Sites. The 2015 ELNA states that Send Business Centre has “indirect” strategic road access, “poor” access to amenities and facilities, and “very poor” access to public transport [see Table 4.2 of the 2015 ELNA]. The report also states that there is no identified potential for intensification and/or additional floorspace. It is clear from this assessment that Send Business Centre is not an appropriate site for the development of further employment land.

5.04 In the 2016 draft version of the Local Plan, employment land Site Allocation 67 was removed, as was the proposal to inset Send Business Centre from the Green Belt. As discussed in Section 4.04 of this document, the reason for this was the allocation’s location in high sensitivity Green Belt. The removal of Send Business Centre’s proposed extension and inseting from the Green Belt reflected the findings of the 2015 ELNA, which correctly identified the shortcomings of the site with regard to further employment land development. In line with this, Policy E1 of the 2016 draft Local Plan included Send Business Centre in its list of Locally Significant Employment Sites.

5.05 The 2017 ELNA was prepared as part of the evidence base to the 2017 draft Guildford Local Plan and now includes the Send Business Centre in its list of Strategic Employment Sites. The 2017 ELNA states that Send Business Centre has “indirect” strategic road access, “good” access to amenities and facilities,

and “good” access to public transport [see Table 4.1 of the 2017 ELNA]. The report also states that there is potential for intensification and/or additional floorspace to be provided.

- 5.06 Send Parish Council contest that the findings of the 2017 ELNA are completely unfounded and mark a significant departure from the findings of the 2015 ELNA published just two years previously.
- 5.07 Firstly, Tannery Lane, which forms the main access point to the Business Centre from Send village, is a rural single-track road with only irregular passing places for vehicles and as such is not appropriate for significant use by commercial vehicles. It provides no street lighting or infrastructure for pedestrians or cyclists and, as is correctly stated in the 2015 ELNA, constitutes poor access to the local amenities available in Send village. There have been no significant alterations to this road since the publication of the ELNA and, thus, it is unclear why the classification of access to amenities from Send Business Centre has changed from “poor” to “good” within two years. It is the opinion of Send Parish Council that a single-track country lane with no street lighting and no pedestrian or cycling infrastructure does not constitute the “good” access to amenities stated in the 2017 ELNA. In fact, it represents an unsafe environment for non-car users wishing to make use of local amenities and an inappropriate environment for a significant increase in vehicular traffic due to the characteristics of the road. As an access route for a Strategic Employment Site, Tannery Lane is fundamentally inappropriate, and as such the findings of the report need to be re-examined with relation to Send Business Centre.
- 5.08 In light of the changed designations at Send Business Centre, and the increase in housing numbers at Clockbarn Nursery, we would also suggest that the 2016 Strategic Flood Risk Assessment is revisited to include Send Business Centre in order to consider the impact of development on Tannery Lane’s flooding issues. The susceptibility of the area to groundwater flooding was clearly set out in the environmental statement¹ submitted with the marina application.
- 5.09 Secondly, as correctly stated in the 2015 ELNA, access to public transport provision at Send Business Centre is very poor. The closest bus stop, which has only hourly bus services to Guildford and Woking, is located in Send village centre and is accessed by a ten-minute walk along the aforementioned Tannery Lane, lacking pedestrian infrastructure, cycle infrastructure, or street lighting. For the 2017 ELNA to refer to this situation as constituting “good” access to public transport does not make logical sense. It represents an unsafe environment for non-car users and, as such, would put increased traffic pressures on Tannery Lane. Send Parish Council calls on the findings of the report related to Send Business Centre to be re-examined.
- 5.10 Finally, the 2015 ELNA states that there is no potential for intensification and/or additional floor space at the Send Business Centre. This reflects the constrained

¹ Volume 8, Water, prepared by Johns Associates.

nature of the site in light of its setting within high sensitivity Green Belt. In the 2017 ELNA, it is stated that there is potential at Send Business Centre for intensification and/or additional floor space. The report does not give an indication as to why this stance has altered in the two years that passed between the 2015 ELNA and the 2017 ELNA, nor how potential intensification and/or additional floorspace would be catered for at the Centre. It does not explain why such growth could not be accommodated in more appropriate locations.

- 5.11 There are no explanations readily available in the 2017 ELNA which seek to justify why Send Business Centre is proposed to be enlarged and re-classified as a Strategic Employment Site, nor why the classification of its access to public transport and local amenities have been upgraded so significantly when no improvements or alterations have occurred with regard to these matters between 2015 and 2017. Send Parish Council believe that these changes are unfounded in available facts and represent a questionable approach to assessing the Borough's current and future stock of employment land.

- 5.12 Policy E1 of the 2017 draft Local Plan includes Send Business Centre within its list of Office (B1a) and Research & Development (B1b) Strategic Employment Sites. No explanations for this change of designation are included in the Local Plan document itself. The Employment Topic Paper, prepared as part of the evidence base for the 2017 draft Local Plan, identifies the 1.4ha Tannery House site adjacent to the Send Business Centre. It states, "Although it [the Tannery House site] remains in high sensitivity Green Belt the unique nature of the site and the existing infrastructure in place means it is considered appropriate for development" [paragraph 4.43 of the Employment Topic Paper]. The Topic Paper goes on to state that significant investment, which has already been secured, will help create an estimated 400 new direct and indirect jobs [paragraph 4.47]. In addition to this it states that "longer term there is potential for significant expansion of 6-7,000sqm on the land adjacent [paragraph 4.49], although it is unclear where this expansion would occur.

- 5.13 Send Parish Council deem this change of Send Business Centre's designation and its proposed enlargement wholly inappropriate and unjustifiable. Send Business Centre is located in high sensitivity Green Belt unsuitable for significant development and accessed via infrastructure that is simply unsuitable for supporting the proposed changes at the Centre.

- 5.14 The Employment Topic Paper states that funding in the Send Business Centre could create an estimated 400 new direct and indirect jobs. Assuming that at the very least 300 of these are direct jobs, this would mean 300 additional employees accessing the Centre. Given the inadequacy of the public transport offer, the likely means of accessing the site is by private car (even if we assume that some employment could be generated locally). The existing car park at the Centre is insufficient for such demand. The single-track Tannery Lane appears unable to deal with such an increase in traffic stress that these movements

would bring, without factoring in any additional commercial vehicles visiting the centre. As discussed above, access to local amenities and local public transport provision is similarly inappropriate, with no street lighting provided on Tannery Lane and no pedestrian and cycling infrastructure. Furthermore, the Topic Paper states that there is potential for a significant expansion of 6-7,000sqm of employment space on the land adjacent to the Centre, yet it is unclear whether the jobs created from this floorspace is included within the aforementioned 300+ jobs. If not, then this would mean even greater stress on infrastructure that seems simply unable to cope.

5.15 Changes sought to make the Local Plan sound:

- Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
- Remove the proposal to enlarge Send Business Centre by insetting Centre and adjacent land from Green Belt.

A58 – Land around Burnt Common warehouse – a minimum of 7,000sqm employment (B1c/B2/B8) floorspace

5.16 The 2014 draft version of the Local Plan included Site Allocation 74, which proposed employment-led mixed-use development on the land around Burnt Common warehouse. This allocation was subsequently removed from the 2016 draft version of the Local Plan, with proposed housing and employment development relocated to the newly created Site Allocation 43 – Garlick’s Arch. This allocation proposed 400 new homes and up to 7,000sqm of commercial (B1c/B2/B8) uses (our emphasis). During the consultation process for the 2016 draft Local Plan, Send Parish made representations against this proposal, which was inappropriate for the site.

5.17 The draft 2017 Local Plan removes the allocation for commercial development from Garlick’s Arch and relocates it back to the land around the Burnt Common warehouse site. Policy E1 includes the land around Burnt Common warehouse within its list of proposed Strategic Employment Sites, while Policy A58 outlines the allocation for the site for a “minimum of 7,000sqm of either or a mix of light industrial (B1c), general industrial (B2), and storage and distribution (B8) with a potential for further industrial floorspace to meet future borough needs” (our emphasis). No residential element is included in this site allocation.

5.18 Send Parish Council does not object to the principal of employment land development on this site. Indeed, in representations made to the draft 2016 version of the Local Plan, Send Parish Council proposed that Guildford Borough Council re-instate the previous allocation for industrial development on Land around Burnt Common Warehouse. However, Policy A58 does not provide an appropriate limit to the scale of industrial development to take place on this site.

The previous allocation for employment land at Garlick’s Arch stated that up to 7,000sqm of employment floorspace would be created. No such maximum exists within Policy A58, with at least 7,000sqm of employment land proposed on Land around Burnt Common Warehouse. Send Parish Council deem this approach unacceptable as it opens the door to a significant intensification of employment uses on the site which would not be suitable for the site.

5.19 Proposed changes to make the Local Plan sound:

- Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.

Summary of Employment Land Provision within Send

5.20 Send is a village of approximately 2,300 people, while Send Marsh/Burnt Common has a population of approximately 1,900. In the May 2014 Settlement Hierarchy Document prepared by Guildford Borough Council as part of the evidence base for the 2014 draft Local Plan, Send, Send Marsh/ Burnt Common are considered to be large villages. Chapter 4 of this document recognises that Send Marsh/Burnt Common is only identified as a large village due to its proximity to Send’s services. Send itself has modest public and commercial amenities, with few additional amenities provided in Send Marsh/ Burnt Common. Both villages have limited access to public transport – served only by hourly bus services which pass through the villages en route between Woking and Guildford – but have good links to the strategic road network.

5.21 The draft Local Plan proposes the creation of two Strategic Employment Sites in the Send Parish. On Send’s current designated Employment Sites, there exists 7,800sqm of employment floorspace. The creation of two Strategic Employment Sites in the Send Parish would increase the employment floorspace within designated employment sites within the Parish to at least 21,000sqm should only the minimum 7,000sqm be provided at Burnt Common. This figure is likely to rise should further employment land be developed at Burnt Common.

5.22 While Send Parish Council recognises the importance of developing a strong rural economy, this significant increase in employment land within the Parish is unsustainable and uncalled for. Send Parish does not have the requisite amenities, facilities, and infrastructure to support two Strategic Employment Sites within its boundaries.

5.23 Changes sought to make the Local Plan sound:

- Maintain existing designation of Send Business Centre as Locally Significantly Employment Site.
- Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.

6. Residential Land Allocations in Send, Send Marsh/Burnt Common

6.01 Send Parish Council object to the following proposals related to residential land allocations included within the 2017 draft Guildford Local Plan:

- Site A42 – Clockbarn Nursery, Tannery Lane, Send – 60 homes.

The reasons for objection are detailed below.

6.02 The 2016 draft Local Plan included Clockbarn Nurseries on Tannery Lane as a residential site allocation for 45 homes. As part of the consultation process, Send Parish Council made representations to Guildford Borough Council regarding this allocation. These representations stated Send Parish Council's concerns regarding the undue stress that the development would exert on the village's infrastructure and the flooding concerns of the site. Other information, such as with the marina application, emphasised other aspects, such as the importance of the area to flora and fauna, such as bats. Further information on these concerns can be seen in greater detail in Send Parish Council's representations made in July 2016.

6.03 The 2017 draft Local Plan once again includes a residential allocation on the site of Clockbarn Nurseries. However, despite the site not changing in size, this allocation has been altered to increase the allocation from 45 new homes to 60 new homes. It is not clear on what basis the plan has deemed an increase to be acceptable.

6.04 Send Parish Council view this increase in the proposed number of homes on the Clockbarn site to be unacceptable. The stretch of Tannery Lane that connects the site to the Send village is narrow and it is difficult for vehicles to pass, especially large commercial vehicles that would be involved in the construction process. Short term parking along this stretch further limits accessibility to this site. Pedestrian infrastructure would be required in order to create a safe environment that pedestrians can use. Furthermore, the consented Marina scheme on the adjacent land and any proposed intensification of Send Business Centre (see also 5.07 – 5.13 above) would significantly increase vehicular flow along Tannery Lane, past the Clockbarn Nursery site. The increase in the number of proposed homes from 45 to 60 would simply exacerbate this problem, making the issues of accessibility and pedestrian safety even more acute.

6.05 The parish council are also concerned that the cumulative, strategic picture regarding transport and the impact on Send Road is not clear enough in the current plan.

6.06 Changes sought to make the Local Plan sound:

- Remove Allocation A42.

7. Land Allocations in Send: Garlick's Arch

7.01 Send Parish Council object to the following proposals related to land allocations included within the 2017 draft Guildford Local Plan:

- Site A43 – Garlick's Arch, Send – 400 homes and travelling showpeople plots.

The reasons for objection are detailed below.

7.02 The parish council made objections to the site at Garlick's Arch in 2016, and the objection to the residential element is maintained.

7.03 The changes introduce a provision for travelling showpeople into this allocation. Policy H1 provides the strategic policy for the provision of plots for travelling showpeople and seeks to secure such plots where provision is being made for 500 homes or more. Garlick's Arch is proposed for only 400 homes, and the parish council therefore question the suitability of the site to accommodate such plots. Whilst there is no detail of how these sites might be accessed, neither Burnt Common Lane nor Kiln Lane are suitable for the sort of vehicles that might be expected at such plots.

7.04 The changes to policy H1, sub-section (6), remove reference to the impact upon the visual amenity of such provisions. The parish council would wish this wording to remain. Whilst the site allocation text introduces reference to visual amenity in para (7) of policy A43, this is not felt to be equivalent to the wording lost from H1.

8. Summary of Proposed Changes and Conclusions

8.01 In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:

- Remove proposals to inset Send Business Centre and adjacent land from the Green Belt.
- Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
- Remove the proposal to enlarge Send Business Centre by insetting Centre and adjacent land from Green Belt.
- Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.
- Maintain existing designation of Send Business Centre as Locally Significantly Employment Site.
- Remove Allocation A42.
- Reconsider the suitability of the Garlick's Arch site for travelling showpeople given the site allocates a number of homes that is below the policy threshold.

8.02 Send Parish Council are pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consultation events.