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Hannah Yates
Planning
Guildford Borough Council
Milmead House
Milmead
Guildford
GU2 4BB

Dear Hannah,

Send Parish Council objection to proposed commercial development at Burnt Common Nurseries (ref: 20/P/00816)

Thank you for the opportunity to comment on the above referenced planning application for development at Burnt Common Nurseries.

This site is the largest industrial space within the Local Plan outside of the Town Centre industrial sites and is therefore of strategic importance to the Parish Council. Whilst the Parish Council acknowledges the site has been allocated in the Local Plan, which establishes the principle of development for commercial (B1(c), B2 and B8 uses), we have a number of concerns about the proposal and therefore write to formally object to the application.

Send Parish Council also reiterates its concern about the volume of applications for multiple dwellings that have been received since the adoption of the Guildford Local Plan in April 2019. The local developments happening concurrently at Garlick's Arch, Clockbarn Nursery, Heath Drive and the Wisley Airfield development will have a huge impact on the village and the surrounding areas. There is no clear plan from the responsible authorities for the expansion of infrastructure and services, which are already at capacity today.

We set out our detailed reasons for our objection below:-

1. Traffic, access and parking

- 1.1 At the time of writing Surrey County Council Highways have requested an extension to the time period in which they can assess the proposals in detail. This indicates that a detailed assessment is being undertaken and we would also reserve the right to submit further comments once their response is provided.
- 1.2 The Transport Assessment estimates there will be an additional 400 vehicle trips from arrivals and departures. Without appropriate transport infrastructure, as required by Policy ID1 and ID3, the proposed development would have a profound impact on the

village of Send, with significant increases in HGV movements through the village and wider traffic impacts on Send Barns Lane, Send Road and Burnt Common.

1.3 We have the following detailed comments about particular roads and junctions:

- The increase in traffic and access to the proposed development will have a huge impact on the Burnt Common roundabout (B2215/A247) which already experiences delays in rush hour. At the moment any minor disruption can lead to long tail backs to the A3 and Woking and any issues on the A3 can also result in a large amount of additional traffic through the villages.
- While the new proposed A3 slip roads (Policy A42) are not directly linked to this site, the Inspector considered this infrastructure improvement when determining that the Local Plan was sound. We consider that the new A3 slip roads are a necessity for this development and that without the slip roads, access to the site for industrial usage is extremely dangerous. Current traffic arrangements on London Road also involve vehicles having to join the north facing slip road leaving the A3 at Wood Hill, which is a location with a high number of accidents over previous years.
- With significantly more vehicles we are concerned about the risks where the A3 slip road meets London Road and Wood Hill, as this is a very tight turn and traffic from the A3 has about 100m before encountering the junction.

1.4 The lack of appropriate pedestrian and cycle access to the proposed development and fragmented approach within the site is a serious concern and is contrary to Policy A45, Policy D1(6,7,9) and Policy ID3(1,2).

1.5 At present there is a footway leading from the Burnt Common roundabout down London Road, however this terminates before the site. Whilst there is a cycle way along London Road, given the volume of new vehicle trips from this site in addition to traffic coming off the A3, this is not considered an attractive route and is unlikely to be used to any significant extent. Furthermore, the new access point onto London Road only allows bicycles to turn left when exiting and requires a significant detour to travel towards Burnt Common roundabout. The Local Plan allocation requires permeability for pedestrians and cyclists into and from the development, and to contribute to an off-site walking and cycling network between the village centre of Send, Garlick's Arch and Clandon railway station.

1.6 There is an opportunity, given the single land ownership of the site, to establish an attractive walking and cycling route that links into the existing footway on the southern side of London Road. We would suggest this be extended into the allocation site at the northern corner, given this is within the control of the landowner. Alternatively, improved pedestrian and cycle access could continue along London Road up to the new access road into the site. The access road is currently shown with a pavement which doesn't lead anywhere, so this would need to be reconfigured to provide an appropriate walking and cycling connection into the site.

1.7 We are concerned about the high level of vehicle parking spaces proposed in relation to Policy ID3(4) and the Parking SPD. As the Applicant does not know the end users and mix of B1/B2/B8 floorspace, they have applied the maximum parking standard of 1 space per 30sqm. This is unacceptable and the final number of parking spaces should be conditional on the actual floorspace mix on occupation. The impact of this will need to be considered in the landscape design, to ensure that if the number of spaces reduces then effort is made to maximise the landscape quality.

- 1.8 We are also concerned about the provision for large lorry parking spaces. The Applicant notes they have applied the SPD allowance for large lorry parking for B8 uses to the total 3,303 sqm of floorspace. In reality, the B8 uses will be a proportion of the overall floorspace. Again, the final number of parking spaces should be conditional on the actual floorspace on occupation and the landscape design will need to be re-considered.

2. Design and landscaping

Overall design vision and concept

- 2.1 Given this is the first phase of development of the wider site allocation, it is essential that it establishes a benchmark for high quality design from the outset. The current proposal does not appear to reflect a considered analysis of the local built or landscape characteristics of Burnt Common or the application site. As such it conveys little imagination or care for the quality of the development and its landscape setting.
- 2.2 It is important that a comprehensive approach is taken to design across the site allocation as a whole. Unfortunately, this does not seem to be the case and the Applicant has not provided an illustrative masterplan for the future phases of the wider allocation. For example, the submitted material shows roads ending abruptly and does not consider new planting strategically.
- 2.3 Whilst the design has responded to Local Plan Policy A45 in terms of providing small and medium sized units, it still approaches the site as a large industrial estate and establishes very large built footprints. The design does not respond to the semi-rural landscape character of its surroundings, fails to appreciate the field boundaries that could have been used to break down the site into smaller parcels, and does not feature enough planting to delineate the buildings and integrate it effectively into the landscape.
- 2.4 Overall the design fails to address NPPF (2019) para 127, which requires development to add to the quality of an area over its lifetime; be visually attractive as a result of good architecture and effective landscaping; be sympathetic to the local character of built environment and landscape setting; establish or maintain a strong sense of place to create attractive, welcoming and distinctive places to work, and create places that are safe, inclusive and accessible, promote health and wellbeing with a high standard of amenity. The design also fails to meet Local Plan Policy D1, which requires high quality design, responding to distinctive local character (including landscape) or to create a new identity if that is more appropriate.

Quantum of development

- 2.5 This proposal is for phase 1 of the wider site allocation and there has already been an uplift in the quantum of development proposed. The allocation site is 9.26ha and the current application site area is 1.30ha, which equals 14% of the allocated area. The allocation is for 14,800sqm floorspace and the application proposes 3,303sqm, which equals 22.3% of the allocated floorspace. We are concerned that if this pattern is repeated it will lead to over-development of the site as new proposals come forward in later phases, particularly in the absence of a comprehensive masterplan for the allocation as a whole.

Architecture and landscaping

- 2.6 The design does not properly reflect the fact that it will be highly visible from surrounding areas. The Applicant has not referenced or responded to the two key relevant views identified in the Send Neighbourhood Plan – one looking east of the application site (L1) and the other looking both east and west along London Road (L2).
- 2.7 The existing industrial unit is fairly well screened, with particularly dense planting along the frontage to London Road that wraps around and lines the access road into the site. There is also currently a strip of planting along the western boundary of the unit, which provides screening. The proposal creates a planted buffer to London Road but doesn't wrap the planting on the new access road, so it is thinner than the treatment for the existing industrial unit. There is no planting along the western edge of the proposed buildings and the existing screening to the existing industrial unit is removed. The proposal doesn't include planting along London Road to the remaining western parcel of land to be developed, leaving very open views of the new industrial buildings. The planting within the site between buildings and screening to parking areas is very limited and this allows the built form of the industrial units to dominate.
- 2.8 The detailed design of the building is disappointing. The front elevation is too complex as each unit is identikit, cramming all the same design features into it. The windows are small, with no roof lighting and this is likely to create spaces that rely on artificial lighting. Little consideration seems to have been given to how the roof line could help to integrate the built form into the site and reduce its visual impact. The design also fails to break down the large blank side and rear elevations – this is particularly sensitive on the western elevation as this is the most prominent.
- 2.9 We are concerned that the Applicant has not considered plant requirements. Given the industrial use of the buildings it is likely that ventilation, fume extraction, AC etc. will be required. Given the sensitivity of views, this should not be added at a later date and approved by condition but instead designed as part of a coordinated approach from the outset so that the impact can be properly assessed.
- 2.10 The 'Proposed Finishes Schedule' and 'Proposed External Elevations' don't specify what the perimeter fence will be made of. We are concerned that it will become a harsh boundary treatment, placed outside the line of planted trees on London Road. The Applicant should respond to the landscape setting and blend the perimeter fence into the landscape through screening.
- 2.11 We are concerned that the design has not considered the landscape and public realm properly in relation to Policy A45 and D1(4,7). The Policy notes the opportunity to establish green corridors and linkages to habitats outside of the site. However, the design includes a secure perimeter and takes an inward-looking approach and does not integrate with its landscape setting at all. Whilst the inclusion of the SuDS feature is positive, this has not been integrated into the public realm design, with very tight space around its edges. There are also numerous small strips and patches of grass that provide minimal visual and functional amenity. The amount of planting within the landscaping is insufficient to properly delineate buildings, frame open spaces and screen parking areas.

See Appendix: Assembled are some precedent images of other projects for the Applicant to consider regarding a design approach

3. Biodiversity

- 3.1 The Local Plan Policy A45 clearly states there is an opportunity for green corridors and linkages to habitats outside the site. The proposal fails to integrate into the landscape, buffers the ancient woodland with a perimeter fence and fails to make sufficient enhancement to landscape quality and tree planting.
- 3.2 As noted by Surrey Wildlife Trust, the application does not provide the council with sufficient information to demonstrate a net gain in biodiversity, which is a requirement under paragraph 170 of the NPPF and Policy ID4(2). The application should not be determined without this information.
- 3.3 In line with paragraph 4.6.47 of the Local Plan, the Applicant should consider the use of green roofs and walls to add to visual interest, reflect the landscape character and minimise any visual impact of the built form.

4. Amenity and environmental impacts

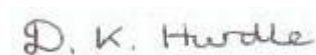
- 4.1 It is noted that the Noise Survey was undertaken in August 2016, almost 4 years ago. Surveys are normally relied upon for a period 2-3 years and this should have been updated to reflect the recent baseline, and allowance should have been made for the lower than average traffic flows in the context of the early stages of the Covid-19 lockdown.
- 4.2 The SuDS pond is poorly integrated into the landscape design, with very narrow grass edges that make it a poor amenity feature and difficult to maintain. This is being included as a precautionary measure given the site is in Flood Zone 1 and should be given proper design consideration in terms of the potential benefits rather than simply slotted into the landscape.

5. Energy/Sustainability

- 5.1 We are concerned that the planning application has not addressed the requirements of Policy D2, providing no information on the sustainability of the design, its construction and energy generation/use. Policy D2(4, 11) requires an Energy and Sustainability Statement for any major development. It does not appear that the Applicant has considered how it will contribute towards climate change adaptation and a zero carbon future, nor whether carbon emissions savings have been made against Part L. Neither does it include decentralised renewable energy generation such as P.V. panels or air source/ground source heat pumps.

I trust that this response is clear and helpful to you in working with the Applicant to ensure that the necessary amendments are made to make the application acceptable.

Yours sincerely



Mrs D Hurdle
Send Parish Council

Appendix

Precedent industrial design images - Send Parish Council objection to proposed commercial development at Burnt Common Nurseries (ref: 20/P/00816)

Sauerbruche Hutton design for Gira headquarters, Radevormwald, Germany – whilst this is a much larger development the design features a simple modern form and uses striped panels to break up the massing.



Hawkins\Brown design for 'Here East', Stratford, London – whilst these buildings are not in industrial use, they draw on an industrial architectural style and introduce playful use of colour. Deeper window reveals and mechanical ventilation express the function of the buildings externally, all knitted together with high quality landscaping.



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Paul Andersen's design for flexible industrial spaces in Frederick, Colorado – this design buildings on the traditional design of an industrial estate but introduces subtle variations to the roof line, is playful with colour, uses high quality materials and detailing and thinks about the overall appearance of the massing as a whole and not just as individual units.



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Wingate + Farquhar design for the Kathleen Kilgour Centre, Tauranga, New Zealand – this illustrates a different approach through the adoption of a sawtooth roofline that adds visual interest, breaks up the massing, allows light into the deep floorplan of the building and also improves the efficiency of roof mounted solar P.V. panels.

