



SEND PARISH COUNCIL

9th December 2025

OBJECTION TO PLANNING APPLICATION 25/P/01539

Application Reference: 25/P/01539

Site: Land at Aldertons Farm, Send Marsh Road, Send, Woking, GU23 7DJ

Proposal: Hybrid planning application comprising: the change of use of approximately 15ha of land to create a new Suitable Alternative Natural Greenspace ('SANG') and outline planning application with all matters reserved (except for principal access to the highway) for the construction of up to 140 homes (including 50% affordable housing), public open space, SuDS, biodiversity enhancements, landscaping, and associated infrastructure.

1. INTRODUCTION

This document constitutes the formal and comprehensive objection of Send Parish Council to the above-referenced planning application. As the democratically elected body representing the residents of Send, we have a duty to ensure that development within our parish is sustainable, appropriate, and in accordance with the established planning framework.

We have undertaken a thorough and detailed review of the application and all its supporting documents, including the Planning Statement, Grey Belt Assessment, Ecological Appraisal, Energy & Sustainability Statement, Heritage Statement, Archaeological Assessment, and other supporting studies. We have concluded that the proposal is fundamentally flawed and would cause significant and demonstrable harm to the Green Belt, the character of the area, and the quality of life of existing and future residents.

This objection identifies significant technical deficiencies, errors, and misrepresentations in the applicant's supporting documentation and provides a detailed critique of the applicant's claims. We therefore urge Guildford Borough Council to refuse this application in the strongest possible terms.

2. SUMMARY OF THE PROPOSAL

The application seeks hybrid permission for a major housing development on a greenfield site within the Metropolitan Green Belt. The proposal includes the creation of a 15-hectare SANG and an outline application for up to 140 dwellings, with 50% affordable housing. While the provision of affordable housing and a SANG are noted, these benefits do not, in our view, outweigh the profound and irreversible harm that would result from this development. In any event, the statutory test remains whether the development accords with the development plan, and if not, whether material considerations demonstrably justify granting permission.

3. GROUNDS FOR OBJECTION

The Parish Council's objection is made on the basis of material planning considerations, including (in summary): Green Belt inappropriateness and harm to openness; harm to settlement separation and local character; transport and cumulative impacts; drainage and flood risk; heritage and archaeology; and the adequacy, deliverability and securing of mitigation (including SANG management in perpetuity).

Our objection is based on the following material planning considerations:

3.1. DIRECT CONFLICT WITH GUILDFORD BOROUGH COUNCIL'S OWN FORMAL ASSESSMENTS

This is a critical and decisive factor. The proposal is for a site that Guildford Borough Council's own officers have repeatedly and recently rejected as being unsuitable for development. This objection must therefore be considered in the context of Guildford Borough Council's own planning assessments.

3.1.1. Guildford Borough Council's November 2025 Discounted Sites Assessment

On 5 November 2025, Guildford Borough Council released its Land Availability Assessment (LAA), which includes Appendix 3: Discounted Sites. This is Guildford Borough Council's own formal assessment of sites that are unsuitable for development. Aldertons Farm, Send Marsh Road, Send is explicitly listed in this document as a discounted site with the reason: "Site not suitable for development due to Green Belt designation."

This is a matter of considerable significance. Guildford Borough Council's own planning officers have formally assessed this site and concluded that it is unsuitable for development precisely because of its Green Belt status. For Guildford Borough Council to now grant planning permission for the very development it has formally rejected would be:

- Inconsistent: It would represent a fundamental contradiction in Guildford Borough Council's planning position, undermining the credibility and coherence of its planning decisions.
- Irrational: It would be difficult to justify how Guildford Borough Council could reject the site in its formal LAA assessment on Green Belt grounds, only to approve a major development on the same grounds weeks later.
- Vulnerable to Challenge: Such a decision would be vulnerable to judicial review on grounds of irrationality and inconsistency.

The fact that Guildford Borough Council's own officers have formally discounted this site due to its Green Belt designation strongly supports our contention that the site is

unsuitable for development and that no very special circumstances exist to justify an exception.

If the LPA were minded to grant permission notwithstanding that position, it would be necessary for the officer report to set out clearly (i) the discounted-site conclusion, (ii) what material considerations or new evidence are said to justify a different outcome on this occasion, and (iii) how the statutory development plan and national Green Belt tests are met on the evidence before the decision-maker. In the absence of such a clear evidential bridge, the Parish Council submits that significant weight should be given to the Council's recent conclusion that Green Belt constraints render the site unsuitable, and that the applicant has not demonstrated circumstances capable of clearly outweighing the definitional harm and other Green Belt harm so as to justify an exception.

3.1.2. Rejection in the Current Guildford Local Plan Consultation

Furthermore, the site has been rejected in the consultation on the current Guildford Local Plan update. As Guildford Borough Council is currently updating its Local Plan to address the new housing targets and grey belt policies introduced by the December 2024 NPPF, it has undertaken a comprehensive assessment of all available sites. Despite the increased housing targets and the new grey belt provisions, Guildford Borough Council has not proposed to allocate Aldertons Farm for development. This is a strong indication that Guildford Borough Council does not consider the site to be appropriate for development, even when applying the new grey belt framework.

The rejection of the site in the Local Plan consultation process is particularly significant because it demonstrates that Guildford Borough Council, with access to all relevant evidence and expertise, has concluded that the site should not be allocated for development. For a planning officer to approve this application would be to overturn Guildford Borough Council's own strategic planning judgment.

3.2. PRINCIPLE OF DEVELOPMENT IN THE GREEN BELT

The application site lies entirely within the Metropolitan Green Belt, where there is a strong presumption against inappropriate development. The NPPF is clear that the construction of new buildings is inappropriate in the Green Belt, unless it falls within a limited number of exceptions. This proposal does not fall within any of these exceptions. Therefore, the applicant must demonstrate that "very special circumstances" exist to justify the development. We contend that no such circumstances exist.

The Parish Council recognises that housing delivery, including affordable housing, is a material consideration capable of carrying weight in the planning balance. However, it is not sufficient for the applicant simply to assert housing need as a headline justification: the test is whether the other considerations relied upon clearly outweigh the Green Belt harm on the evidence.

In addition, the Parish Council submits that the proposed SANG should be treated with care in the planning balance. SANG is, in substance, mitigation intended to address likely significant effects on protected habitats. The Council must be satisfied, before granting permission, that the proposal will not adversely affect the integrity of the relevant European site(s), applying the statutory habitats assessment duties¹. Mitigation necessary to make a scheme acceptable in habitats terms should not be double-counted as a free-standing public benefit capable of outweighing Green Belt harm. Further, the SANG itself involves works that may contribute to Green Belt harm (through formalisation, infrastructure, signage, lighting, or other urbanising features), and must be assessed as part of the overall impact of the proposal rather than treated as an unqualified environmental gain.

3.3. THE APPLICANT'S 'GREY BELT' CLAIM IS FUNDAMENTALLY FLAWED

The applicant's core argument is that the site qualifies as "grey belt" land under NPPF paragraph 155, and therefore the development is not inappropriate in the Green Belt. This argument is based on a series of errors and misrepresentations that are examined in detail below.

The applicant's Grey Belt Assessment (Appendix 1 to the Planning Statement) concludes that the site "does not perform strongly against purposes (a), (b), or (d)" of the Green Belt. This conclusion is demonstrably wrong and is contradicted by the applicant's own evidence.

3.3.1. The Site DOES Strongly Contribute to Green Belt Purpose (a): Checking Unrestricted Sprawl

The Applicant's Claim: The applicant argues that the site does not strongly contribute to Green Belt purpose (a) because it is "contained" and of "limited scale."

The Reality: The site comprises 21.23 hectares of open countryside in the Metropolitan Green Belt. The development of 140 homes on 5.07 hectares would represent a significant extension of the built-up area into open countryside. The fact that the site is "contained" by hedgerows and field boundaries does not diminish its contribution to checking sprawl. Indeed, the purpose of the Green Belt is precisely to prevent the incremental encroachment of development into open countryside.

The applicant's reasoning is circular: it argues that because the site is currently open countryside, it does not contribute to checking sprawl. This is backwards. The site contributes to checking sprawl precisely because it is open countryside. If all such sites were developed on the basis that they are "contained," the Green Belt would be progressively eroded.

The site is located between Send and Send Marsh, and development would represent a direct extension of these settlements into previously undeveloped

¹ Conservation of Habitats and Species Regulations 2017, reg 63.

countryside. This is precisely the type of sprawl that Green Belt policy is designed to prevent.

The location of Send, the surrounding villages and the metropolitan greenbelt that surrounds these villages act as an important buffer zone that protects the urban sprawl between Guildford and Woking. Guildford Borough Council must take into account the cumulative affect that currently approved developments have already had in eroding this buffer zone (see Appendix 1 – Map 1). Any further development of the highly important Metropolitan Greenbelt around Send and its neighbouring villages will only exacerbate the erosion of this buffer zone and ultimately lead to urban sprawl. If this currently discounted site is allowed to be developed, than it stands to reason that all discounted sites will become sites for future development leading to extreme urban sprawl and ultimately creating an amalgamation of Guildford, Woking, Send, Send Marsh, Burntcommon and Ripley (see Appendix1 – Map 2).

3.3.2. The Site DOES Strongly Contribute to Green Belt Purpose (b): Preventing Neighbouring Towns Merging

The Applicant's Claim: The applicant argues that the site does not strongly contribute to Green Belt purpose (b) because it is not located in a strategic gap between major settlements.

The Reality: While the site is not in a strategic gap between major settlements (such as Guildford and Woking), it does contribute to the separation of Send from Burntcommon and other settlements. The site is located between these settlements and development would contribute to their coalescence.

More importantly, the applicant's interpretation of Green Belt purpose (b) is too narrow. Purpose (b) is not limited to preventing the merger of major settlements; it also applies to preventing the merger of smaller settlements and villages. The site plays a role in maintaining the separation between Send and Burntcommon, and development would undermine this separation.

3.3.3. The Site DOES Strongly Contribute to Green Belt Purpose (d): Preserving the Setting and Special Character of Historic Towns

The Applicant's Claim: The applicant argues that the site does not strongly contribute to Green Belt purpose (d) because Send is not designated as a "historic town."

The Reality: The applicant's interpretation of Green Belt purpose (d) is again too narrow. Purpose (d) applies not only to formally designated "historic towns" but to any town with historic character. Send has a rich medieval heritage, with the Church of St Mary dating from around 1240, and the site itself contains a Scheduled Monument (medieval moated site). Moreover, Send Parish Council submits that this does not dispose of the issue: the proposal must still be assessed for its effects on designated heritage assets and their settings, which are material considerations and

attract great weight in national policy. Further, the presence and sensitivity of designated heritage assets is directly relevant to whether land can properly be treated as “grey belt”, because “grey belt” excludes land where policies relating to footnote 7 assets (including designated heritage assets) provide a strong reason to refuse or restrict development.

The site contributes to the setting of Send as a historic settlement. Development would harm this setting by introducing modern residential development into the open countryside that forms the backdrop to the historic settlement.

In this case, the site includes heritage sensitivity associated with the moated medieval manor complex at Old Hall (Scheduled Monument) and its archaeological potential, as confirmed by Surrey County Council's archaeology consultee response². The Parish Council submits that the assessment must therefore address, with specificity, how built form, lighting, access infrastructure and “formalisation” of countryside would affect the significance and setting of nearby heritage assets and whether that heritage constraint disqualifies the land from “grey belt” in the first place.

3.3.4. The Applicant's Assessment of Footnote 7 Exclusions is Deficient

The applicant's Planning Statement and Grey Belt Assessment fail to properly address the exclusions set out in NPPF footnote 7. The applicant claims that “there are no constraints which represents a strong reason to refuse or restrict development.” This is demonstrably incorrect.

Thames Basin Heaths Special Protection Area (SPA): The site is located within 5km of the Thames Basin Heaths SPA, a European-designated site of international importance. The applicant acknowledges this and proposes a 15-hectare SANG as mitigation.

However, the applicant fails to address whether the SPA designation provides a “strong reason for refusing or restricting development” under footnote 7.

The fact that the applicant proposes a SANG demonstrates that the development would have a significant adverse impact on the SPA without mitigation. This suggests that the SPA designation does provide a strong reason for refusing or restricting development, which would exclude the site from grey belt status under the footnote 7 exclusions.

Scheduled Monument: The site contains a Scheduled Monument (medieval moated site and earlier earthwork south of Boughton Hall). The applicant's Heritage Statement and Archaeological Assessment conclude that there would be “less than substantial harm” to the monument. However, the applicant fails to address whether

² Surrey County Council, Historic Environment Planning: Archaeology, ‘Consultation Response: Application 25/P/01539, Land at Aldertons Farm, Send Marsh Road, Send, Woking, GU23 7DJ’ (5 December 2025).

the Scheduled Monument designation provides a "strong reason for refusing or restricting development" under footnote 7.

The presence of a Scheduled Monument on the site, combined with the proposed development, suggests that the monument designation does provide a strong reason for restricting development, which would exclude the site from grey belt status.

3.3.5. The Applicant's Assessment of "Strong," "Moderate," and "Weak" Contributions is Subjective and Unjustified

The applicant's Grey Belt Assessment applies the Planning Practice Guidance (PPG) criteria for assessing Green Belt purposes. However, the applicant's categorisation of the site's contribution to Green Belt purposes as "weak" or "not strong" is subjective and lacks proper justification.

The PPG guidance on grey belt emphasises that assessments should be "robust" and based on "clear and proportionate evidence." The applicant's assessment fails to meet this standard. The assessment is brief, lacks detailed evidence, and reaches conclusions that are contradicted by the applicant's own evidence (e.g., the need for a 15-hectare SANG to mitigate impacts on the SPA).

3.3.6. Recent Appeal Decisions Demonstrate High Bar for Grey Belt Classification

Recent appeal decisions demonstrate that "grey belt" is not a label that automatically follows from land being previously developed, and that sites which contribute strongly to Green Belt purposes will not meet the definition. In

APP/J1915/W/24/3339916 (Suite 1, The Stables, Cannons Mill Lane, Bishop's Stortford) the Inspector found that, although the appeal site was previously developed land, it contributed strongly to Green Belt purpose (a) (checking the unrestricted sprawl of large built-up areas) and therefore, by definition, was not "grey belt"; the Inspector consequently concluded that the proposal failed the relevant "grey belt" gateway³. This decision is fact-specific, but it underlines the need for a robust, evidence-led assessment of whether the application site truly "does not strongly contribute" to purposes (a), (b) or (d), rather than a conclusory scoring exercise.

3.4. ADVERSE IMPACT ON THE THAMES BASIN HEATHS SPECIAL PROTECTION AREA (SPA)

The application site is located within the 5km zone of influence of the Thames Basin Heaths SPA, a European-designated site of international importance for its rare bird populations. Any new residential development within this zone is likely to have a significant effect on the SPA, due to increased recreational pressure. The applicant proposes to mitigate this impact through the creation of a 15-hectare SANG.

³ *Appeal Decision APP/J1915/W/24/3339916, Suite 1, The Stables, Cannons Mill Lane, Bishop's Stortford CM23 2BN (Inspector: Robin Buchanan BA (Hons) MRTPI, decision date 16 January 2025) paras 16–18.*

However, we have serious concerns about the adequacy and appropriateness of this mitigation.

3.4.1. The SANG Proposal Raises Fundamental Questions About Site Suitability

The applicant proposes a 15-hectare SANG to mitigate the development's impact on the Thames Basin Heaths SPA. However, the very fact that such extensive mitigation is necessary raises fundamental questions about the suitability of the site for development.

The NPPF footnote 7 exclusions state that grey belt land does not include land where the application of policies relating to "habitats sites" would provide a strong reason for refusing or restricting development. The Thames Basin Heaths SPA is a habitats site.

The applicant's own evidence (the need for a 15-hectare SANG) demonstrates that the development would have a significant adverse impact on the SPA. This suggests that SPA designation does provide a strong reason for restricting development, which would exclude the site from grey belt status.

3.4.2. Deficiencies in the SANG Assessment

The applicant's Ecological Appraisal provides limited detail on the SANG assessment. Key deficiencies include:

Lack of Detail on SANG Functionality: The Ecological Appraisal does not provide sufficient detail on how the SANG would function to mitigate recreational pressure on the SPA. The assessment states that the SANG would have "capacity to mitigate recreational pressure on the TBHSPA of up to 744 dwellings" but does not explain how this figure was calculated or what assumptions underlie this calculation.

Uncertainty About SANG Delivery: The SANG is proposed as part of a hybrid application, with outline permission for the residential development. However, there is no guarantee that the SANG would be delivered if the residential element is approved. The applicant should be required to provide a binding legal agreement securing the delivery and long-term management of the SANG before any permission is granted for the residential development.

Lack of Evidence on Accessibility: The applicant does not provide sufficient evidence that the SANG would be accessible to residents of the proposed development. The SANG is located on the western part of the site, separated from the residential development by a buffer zone. The applicant does not explain how residents would access the SANG or whether it would be sufficiently attractive to divert recreational pressure away from the SPA.

Uncertainty About Long-Term Management: The applicant does not provide sufficient detail on how the SANG would be managed and maintained in perpetuity. The SANG

contains a Scheduled Monument and is subject to various constraints. The applicant does not explain how these constraints would be managed or how the SANG would be maintained to ensure its continued effectiveness in mitigating recreational pressure on the SPA.

SANG Adequacy: The proposed SANG must meet the stringent quality and design standards set out by Natural England. We are not convinced that the proposed SANG will be of sufficient quality to divert recreational pressure from the SPA.

SANG Location: The SANG must be located where it will be attractive to new residents and effectively intercept their recreational trips to the SPA. We question whether the proposed location of the SANG is optimal in this regard.

In-perpetuity Management: The SANG must be managed and maintained in perpetuity to ensure its long-term effectiveness. We are concerned that the proposed management arrangements may not be sufficiently robust.

Given the international importance of the SPA, the precautionary principle must be applied. In the absence of a robust and demonstrably effective mitigation strategy, the application must be refused.

3.4.3. The SANG Does Not Justify Inappropriate Development in the Green Belt

Even if the SANG is delivered and functions effectively, it does not justify the development as a benefit that outweighs the harm to the Green Belt. The SANG is a mitigation measure, required to make the development acceptable in environmental terms. It does not justify the development; it merely attempts to address the harm that the development would cause.

The applicant's Planning Statement lists the SANG as one of the "weighty benefits" of the development. This is incorrect. The SANG is a mitigation measure, not a benefit. It should not be given weight in the planning balance.

3.5. CONFLICT WITH THE ADOPTED DEVELOPMENT PLAN AND EXPLICIT COUNCIL REJECTION

The proposal is in direct conflict with the adopted development plan and has been explicitly rejected by Guildford Borough Council's own planning assessments.

3.5.1. Guildford Local Plan

The Local Plan designates the site as Green Belt and does not allocate it for development. The proposal is therefore contrary to the spatial strategy of the Local Plan.

3.5.2. Send Neighbourhood Development Plan (SNDP)

The SNDP, which was made in May 2021 following extensive community consultation and a referendum, explicitly seeks to protect the Green Belt and the separate identity of Send. Policy SNPE1 of the SNDP states that development in the

Green Belt will only be supported where it is in accordance with national and local Green Belt policy. This proposal is clearly not in accordance with that policy. Furthermore, the Aldertons Farm site was considered for allocation during the preparation of the SNDP and was rejected by the community.

3.6. INADEQUATE INFRASTRUCTURE AND SERVICES

The existing infrastructure and services in Send are already under severe strain. The addition of up to 140 new homes would have a significant and detrimental impact on:

- Schools: Local schools are already at or over capacity. The development would generate a significant number of new pupils, with no clear plan for how they would be accommodated.
- Healthcare: GP surgeries in the area are already struggling to meet demand. The development would place an unacceptable additional burden on these vital services.
- Transport: The local road network is already congested, particularly at peak times. The development would generate a significant number of new car journeys, exacerbating congestion and air pollution.

While the applicant has made vague commitments to infrastructure contributions, these are not specified and are unlikely to be sufficient to mitigate the full impact of the development. The proposal is therefore contrary to the NPPF, which requires that development should be supported by the necessary infrastructure.

3.6.1. The Applicant's Infrastructure Proposals are Vague and Unspecified

The applicant's Planning Statement states that the development would include "a suite of off-site highways improvements, and enhancements to the PRow network" and that "Draft heads of terms are identified within Section 7 of this planning statement."

However, Section 7 of the Planning Statement (Draft Heads of Terms) is remarkably vague. The applicant does not specify:

- The exact nature of the highways improvements
- The cost of the improvements
- Whether the improvements would be sufficient to mitigate the impact of the development on the local highway network
- The exact enhancements to the Public Rights of Way network
- Whether these enhancements would be sufficient to provide adequate access to the SANG and other green spaces

This vagueness is problematic. The applicant should be required to provide detailed specifications of all proposed infrastructure improvements, together with evidence

that these improvements would be sufficient to mitigate the impact of the development.

3.6.2. Inadequate Highways Mitigation

The development would generate significant vehicle movements, particularly during peak hours. The site is located on Send Marsh Road (B368), which is a narrow, rural road with limited capacity.

The applicant's Transport Statement should be required to demonstrate that:

- The local highway network has sufficient capacity to accommodate the traffic generated by the development
- The proposed highways improvements would be sufficient to mitigate the impact of the development
- The development would not result in unacceptable impacts on highway safety or congestion

The applicant should be required to provide detailed traffic modeling and evidence of consultation with Surrey County Council (the local highways authority) confirming that the proposed improvements are acceptable.

3.6.3. Inadequate Education and Healthcare Provision

The development would generate demand for education and healthcare services. The applicant does not specify what contributions would be made toward education and healthcare provision.

Send Parish has limited education and healthcare facilities. The nearest primary school is Send Primary School, which is already at or near capacity.

There is no secondary school in Send or Send Marsh. Children from the parish are dispersed between several secondary schools in Woking and Guildford, including David Bishop Brown in West Byfleet, Woking High School, Hoe Valley School, George Abbot School, Guildford County School and St John the Baptist School in Woking, all of which are some distance from the application site and reached via the already-congested A247 / B2215 corridor.

Previous representations to the Guildford Local Plan examination highlighted that Send Primary School was already full and that there is no local secondary school, with pupils sometimes unable to secure places at their nearer preferred schools (such as George Abbot and Hoe Valley) and being allocated to schools further away.

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Since the adoption of the Plan, additional large housing schemes have been consented in Send, Send Marsh and the surrounding area, increasing pressure on existing secondary provision without any corresponding new secondary capacity.

In this context, a further major housing development at Aldertons Farm, in a parish with no secondary school of its own, would add to the demand for places at already-stretched schools in Woking and Guildford. The application is not accompanied by any clear, secured mitigation in the form of secondary education contributions proportionate to the cumulative growth in the A3 corridor, and therefore fails to demonstrate compliance with Policy ID1 (Infrastructure and Delivery) of the Guildford Local Plan.

The nearest GP surgery is Send Surgery, which is also at or near capacity.

The applicant should be required to provide evidence of consultation with the local education authority and NHS England confirming that the proposed contributions would be sufficient to mitigate the impact of the development on education and healthcare services.

3.6.4. The Golden Rules Require Specific Infrastructure Contributions

NPPF paragraph 156 requires that major development involving the provision of housing on Green Belt land should include "necessary improvements to local or national infrastructure."

The applicant's Planning Statement does not specify what infrastructure improvements are "necessary." The applicant should be required to:

1. Identify all infrastructure deficits in the local area
2. Demonstrate that the development would exacerbate these deficits
3. Specify the infrastructure improvements that would be necessary to mitigate the impact of the development
4. Provide evidence that the proposed improvements would be sufficient to mitigate the impact

The applicant's current approach of listing vague "off-site highways improvements" and "enhancements to the PRoW network" does not meet this requirement.

3.7. FAILURE TO COMPLY WITH THE GOLDEN RULES

Even if the site were to be considered grey belt (which we strongly dispute), the proposal would still fail to comply with the Golden Rules set out in the NPPF.

3.7.1. Affordable Housing: Viability Not Demonstrated

The applicant's Planning Statement claims that the development would provide 50% affordable housing (up to 70 actual homes), which it argues complies with the "Golden Rules" set out in NPPF paragraph 157.

However, the applicant does not provide a viability assessment demonstrating that 50% affordable housing is deliverable. This is a significant omission.

Significant Site Constraints Undermine Viability

The site is subject to significant constraints that would increase development costs and undermine the viability of 50% affordable housing:

SANG Provision: The applicant proposes to provide a 15-hectare SANG as part of the development. The cost of acquiring, preparing, and maintaining the SANG in perpetuity would be substantial. The applicant does not explain how this cost has been factored into the viability assessment.

Scheduled Monument: The site contains a Scheduled Monument. The applicant's Archaeological Assessment recommends various mitigation measures, including archaeological investigation and monitoring. These measures would increase development costs.

Heritage Constraints: The site is in the vicinity of several Grade II Listed Buildings. The applicant's Heritage Statement concludes that there would be "less than substantial harm" to these buildings. However, the measures necessary to minimise this harm (e.g., careful design, landscaping) would increase development costs.

Flood Risk and Drainage: The site is subject to surface water flood risk. The applicant's Flood Risk Assessment recommends various mitigation measures, including sustainable drainage systems (SuDS). These measures would increase development costs. Separately from surface-water flood risk, the development also raises issues of water resource sustainability and protection of the chalk aquifer during construction. Affinity Water⁴ note the Borough is within a water-stressed area and expect the development to incorporate water-efficient fixtures and fittings, with a design standard of 110 litres per person per day (or less), and recommend measures such as rainwater harvesting/greywater recycling. They also highlight risks of construction mobilising contamination, and advise that any works involving excavations below the chalk groundwater table (e.g. piling) should be preceded by a ground investigation and appropriate techniques to avoid adverse impacts on the chalk aquifer.

Ecological Constraints: The site is subject to various ecological constraints. The applicant's Ecological Appraisal recommends various mitigation measures, including biodiversity enhancements and net gain of at least +20%. These measures would increase development costs.

The Applicant Should Be Required to Provide a Viability Assessment

The applicant should be required to provide a detailed viability assessment demonstrating that 50% affordable housing is deliverable, taking into account all of

⁴ Consultation Response: Planning Application 25/P/01539 (Land at Aldertons Farm, Send Marsh Road, Send, Woking, GU23 7DJ) (letter/consultation response, 4 December 2025) 2.

the above constraints. The viability assessment should be independently reviewed by Guildford Borough Council's viability assessor.

If the viability assessment demonstrates that 50% affordable housing is not deliverable, the applicant should be required to reduce the quantum of development or increase the proportion of affordable housing that is delivered as grant-funded housing (rather than relying on cross-subsidy from market housing).

3.7.2. Infrastructure Improvements: Inadequate and Unspecified

As set out above, the proposed infrastructure contributions are not specified and are unlikely to be sufficient to meet the needs of the development.

3.7.3. Accessible Green Space: SANG is a Mitigation Measure, Not a Public Benefit

The proposed SANG is a mitigation measure, not a public benefit. The proposal does not include any additional accessible green space for the new residents beyond the mitigation required for the SPA.

3.8. ENVIRONMENTAL ASSESSMENT: SCREENING OPINION DECISION IS QUESTIONABLE

3.8.1. The EIA Screening Opinion is Questionable

The Parish Council notes that the application site area exceeds the 5ha threshold for "urban development projects" under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. On the face of it, the proposal therefore falls within a category of development for which the local planning authority must consider whether the project is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

We understand that the Council has issued a negative EIA screening opinion. However, in light of the site's Green Belt location, its scale, its proximity to the Thames Basin Heaths SPA, and the cumulative traffic and environmental effects alongside other committed and proposed developments in Send, Ripley, Ockham and the wider A3 corridor, the reasoning for that conclusion is not clear from the application documents.

The Parish Council does not contend that an Environmental Statement is automatically required simply because the Schedule 2 area threshold is exceeded. We do, however, consider that the current screening outcome appears questionable and inadequately reasoned, particularly given the acknowledged need to consider cumulative and in-combination effects.

We therefore respectfully request that Guildford Borough Council:

a) publishes the full EIA screening opinion and its reasoning on the public file, including how the Schedule 3 selection criteria have been applied; and

b) re-examines, in light of consultee responses and up-to-date information on cumulative impacts, whether the conclusion that the development is not likely to give rise to significant environmental effects can be robustly maintained.

If the Council remains of the view that an Environmental Statement is not required, we ask that the decision report clearly explains the basis for that conclusion, so that local residents and consultees can understand how the EIA Regulations have been applied in this case.

3.8.2. The Applicant's Environmental Assessment is Incomplete

Even if an EIA is not required, the applicant's environmental assessment (comprising the various supporting studies) is incomplete and does not adequately address the environmental impacts of the development.

Key deficiencies include:

Cumulative Impact Assessment: The applicant does not assess the cumulative impact of this development with other developments in the area. Send Parish has been subject to significant development pressure in recent years, with several large housing developments already approved or under construction. The applicant should be required to assess the cumulative impact of this development with these other developments.

Landscape and Visual Impact Assessment: The applicant's Landscape and Visual Impact Assessment should demonstrate that the development would not have unacceptable landscape and visual impacts. Given the site's location in the Green Belt and its visibility from surrounding areas, the applicant should be required to provide detailed photomontages and visual impact assessment.

Ecological Impact Assessment: The applicant's Ecological Appraisal should demonstrate that the development would not have unacceptable ecological impacts. The applicant proposes biodiversity net gain of at least +20%, but does not explain how this would be achieved or whether it would be sufficient to mitigate the loss of habitat.

3.9. HERITAGE ASSESSMENT: INADEQUATE CONSIDERATION OF SCHEDULED MONUMENT

3.9.1. The Scheduled Monument is a Significant Constraint

The site contains a Scheduled Monument (medieval moated site and earlier earthwork south of Boughton Hall). This is a designated heritage asset of national importance.

The applicant's Heritage Statement and Archaeological Assessment conclude that there would be no harm to the Scheduled Monument from the proposed development. However, this conclusion is questionable.

3.9.2. The SANG Design May Harm the Scheduled Monument

The applicant proposes to use the area containing the Scheduled Monument as part of the SANG. The applicant states that the SANG design would "retain positively contributing elements of the Site's historic parkland character" and that "new tree-planting is proposed in this central area, which is informed by former tree planting in the 19th century as part of the Boughton Hall park."

However, the applicant does not provide sufficient detail on the SANG design to assess whether this would harm the Scheduled Monument. Key questions include:

- Would the proposed tree planting harm the setting of the Scheduled Monument?
- Would the proposed footpaths and access arrangements harm the Scheduled Monument?
- Would the proposed car park and facilities harm the Scheduled Monument?
- Would the introduction of public access to the Scheduled Monument harm its setting?

The applicant should be required to provide detailed plans and a detailed heritage assessment addressing these questions.

3.9.3. The Archaeological Assessment is Incomplete

The applicant's Archaeological Assessment recommends various mitigation measures, including archaeological investigation and monitoring. However, the applicant does not specify the extent of these investigations or the cost implications.

The applicant should be required to provide a detailed specification of the archaeological investigations that would be required, together with evidence that these investigations would be sufficient to mitigate any harm to the Scheduled Monument.

3.10. ENERGY AND SUSTAINABILITY: CLAIMS NOT SUBSTANTIATED

3.10.1. The Applicant's Sustainability Claims are Vague

The applicant's Energy & Sustainability Statement makes various claims about the sustainability of the development, including:

- The homes will be "zero-carbon ready" and "very low carbon from the outset"
- There will be "no natural gas connection to the proposed development"
- Energy demand will be met from "low and zero carbon sources"

- The development will achieve "high levels of water efficiency"
- The development will "anticipate future changes in the climate"

However, the applicant does not provide sufficient detail on how these claims would be achieved.

Key deficiencies include:

Low and Zero Carbon Energy: The applicant does not specify what sources of low and zero carbon energy would be used. The applicant mentions "renewable energy" and "heat networks" but does not provide detail on how these would be implemented or whether they would be sufficient to meet the energy demands of the development.

Water Efficiency: The applicant states that the development would achieve water efficiency of no more than 110 litres per person per day (l/p/d), in accordance with Approved Document G. However, the applicant does not explain how this would be achieved or whether the proposed measures (water efficient fixtures, rainwater recycling) would be sufficient.

Climate Change Adaptation: The applicant states that the development would "anticipate future changes in the climate" but does not provide detail on what measures would be taken to adapt to climate change (e.g., flood resilience, overheating risk reduction).

3.10.2. The Applicant Should Be Required to Provide Detailed Specifications

The applicant should be required to provide detailed specifications of all proposed sustainability measures, together with evidence that these measures would be sufficient to meet the claims made in the Energy & Sustainability Statement.

The applicant should also be required to provide evidence of consultation with Guildford Borough Council's sustainability advisor confirming that the proposed measures are acceptable.

3.11. DESIGN AND ACCESS: INSUFFICIENT DETAIL PROVIDED

3.11.1. The Application is in Outline Form

The application is submitted in outline form, with all matters reserved except for principal access to the public highway. This means that the detailed design of the development has not been provided.

However, the applicant provides an "Illustrative Masterplan" to demonstrate how the site could be arranged. The applicant should be required to provide more detail on the proposed design, including:

- The density of development in different parts of the site
- The mix of house types and sizes

- The design principles that would be applied to the development
- How the development would integrate with the surrounding landscape and heritage assets

3.11.2. The Design Should Respond to the Site's Constraints

The site is subject to significant constraints, including:

- The presence of a Scheduled Monument
- Proximity to Grade II Listed Buildings
- Location in the Green Belt
- Proximity to the Thames Basin Heaths SPA
- Surface water flood risk

The applicant's design should respond to these constraints. However, the applicant does not provide sufficient detail on how the design would address these constraints.

The applicant should be required to provide a detailed Design and Access Statement that explains how the proposed design responds to the site's constraints and how it would integrate with the surrounding landscape and heritage assets.

3.12. PREMATURITY AND THE PLAN-LED SYSTEM

Guildford Borough Council is currently in the process of updating its Local Plan to address the new housing targets and grey belt policies in the December 2024 NPPF. This application is therefore premature and undermines the plan-led system of planning control.

The NPPF emphasises that planning decisions should be made in accordance with the development plan, unless material considerations indicate otherwise. The plan-led system is a fundamental principle of English planning law. By determining this application before the Local Plan update is complete, Guildford Borough Council would be:

- Circumventing the plan-led system: The application would be determined in the absence of an up-to-date development plan that has been subject to public consultation and examination.
- Prejudging the Local Plan process: Approving this application would effectively determine the outcome of the Local Plan consultation process, preventing Guildford Borough Council from making an informed decision about the appropriate location for development in the borough.
- Preventing cumulative impact assessment: Guildford Borough Council would be unable to consider the cumulative impact of this development alongside other proposals in the borough.

•Undermining democratic accountability: The Local Plan process is subject to public consultation and examination by an independent inspector. Approving applications before the plan is updated would bypass these important safeguards.

It would be inappropriate to grant permission for a major development of this scale before Guildford Borough Council has had the opportunity to consider the cumulative impact of development across the borough and to identify the most sustainable locations for new housing through the plan-led system.

3.13. INCONSISTENCY WITH THE APPLICANT'S OWN MITIGATION STRATEGY

The applicant proposes to create a 15-hectare SANG as mitigation for the development's impact on the Thames Basin Heaths SPA. However, this raises a significant and troubling question: if the site is suitable for development, why is such extensive mitigation necessary?

The need for a SANG of this scale suggests that the development would have a significant adverse impact on the SPA. This is an acknowledgment by the applicant that the development would cause harm to a European-designated site of international importance. The fact that such substantial mitigation is required demonstrates the sensitivity of the location and the unsuitability of the site for development.

Furthermore, the provision of a SANG is not a benefit that can be weighed in the balance to justify inappropriate development in the Green Belt. The SANG is a mitigation measure, required to make the development acceptable in environmental terms. It does not justify the development; it merely attempts to address the harm that the development would cause.

3.14. CUMULATIVE IMPACT AND PRECEDENT

This application is not being made in isolation. Send Parish has been subject to significant development pressure in recent years, with several large housing developments already approved or under construction. The approval of this application would set a dangerous precedent and would likely lead to further applications for development on Green Belt land in the parish and across the borough.

The cumulative impact of development on the character of Send, the integrity of the Green Belt, and the sustainability of the area must be carefully considered. The approval of this application would represent a significant step towards the erosion of Green Belt protection in the borough and would make it increasingly difficult for Guildford Borough Council to resist future applications for development on Green Belt land.

Moreover, the approval of this application would be inconsistent with Guildford Borough Council's own assessment in its November 2025 Land Availability Assessment, which has discounted this site due to its Green Belt designation. If this

site is approved, what is to stop applicants from challenging Guildford Borough Council's assessment of other discounted sites? The decision on this application will send a powerful signal about Guildford Borough Council's commitment to Green Belt protection.

4. CONCLUSION

For the reasons set out above, Send Parish Council strongly objects to this planning application. The proposal represents a significant and unjustified intrusion into the Green Belt, which would cause demonstrable harm to the character of the area, the integrity of the Thames Basin Heaths SPA, and the quality of life of existing and future residents. The proposal is contrary to national and local planning policy and should be refused.

Most significantly, this application seeks permission for development on a site that Guildford Borough Council itself has formally discounted as unsuitable for development due to its Green Belt designation (November 2025 Land Availability Assessment). The site has also been rejected in the consultation on the current Local Plan update. For Guildford Borough Council to now grant planning permission would represent a fundamental contradiction in its planning position and would be vulnerable to judicial review on grounds of irrationality and inconsistency.

The applicant has failed to demonstrate any very special circumstances that would justify an exception to Green Belt policy. The provision of affordable housing and a SANG do not constitute very special circumstances. The site makes a strong contribution to the purposes of the Green Belt, and the development would cause significant and demonstrable harm to the Green Belt, the character of the area, the integrity of the Thames Basin Heaths SPA, and the quality of life of existing and future residents.

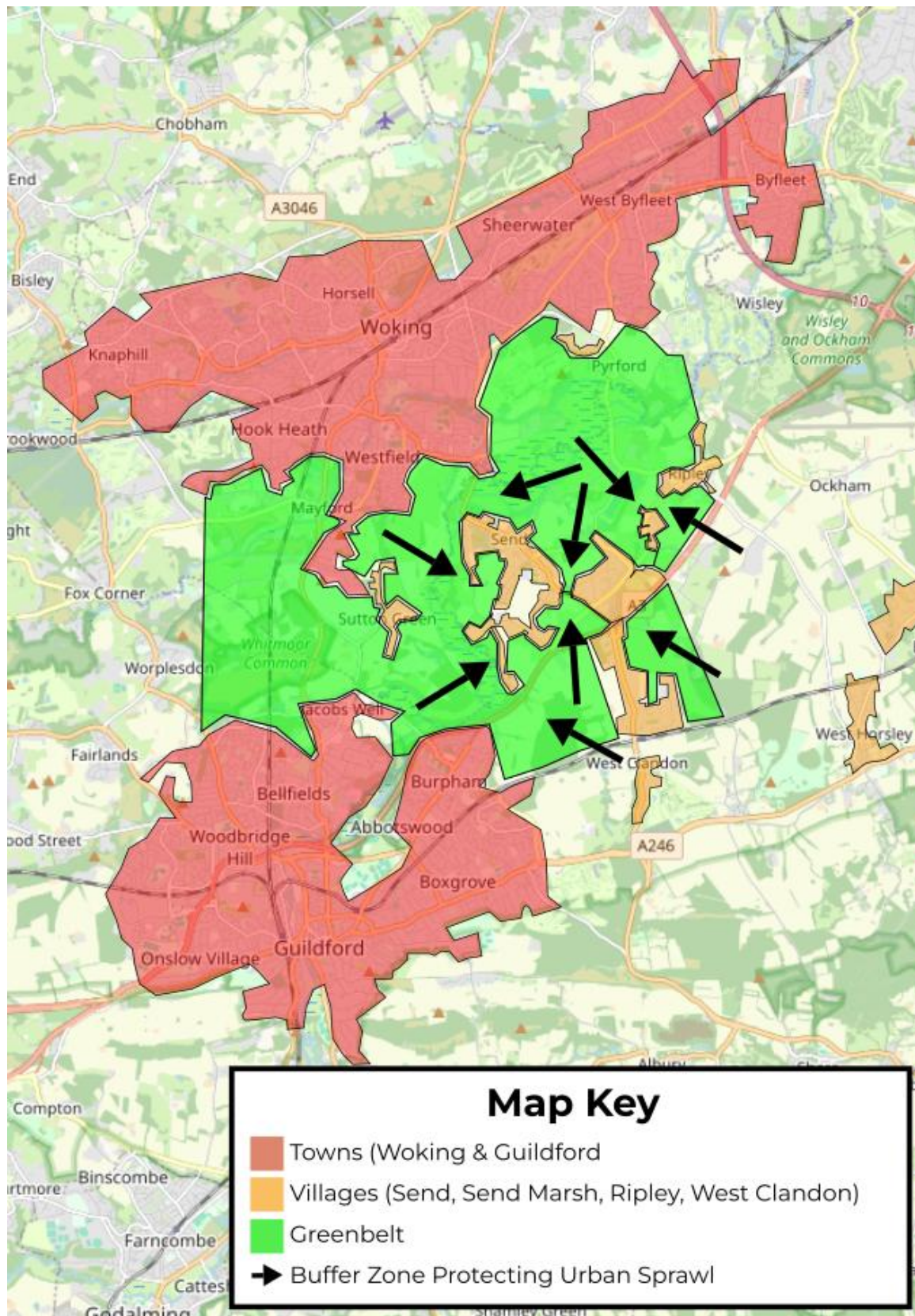
We therefore urge Guildford Borough Council to refuse this application and to reaffirm its commitment to Green Belt protection. We trust that Guildford Borough Council will give due weight to our objections and will act to protect the Green Belt and the community of Send from this inappropriate and unsustainable development.

Cllr Hugh Thomas

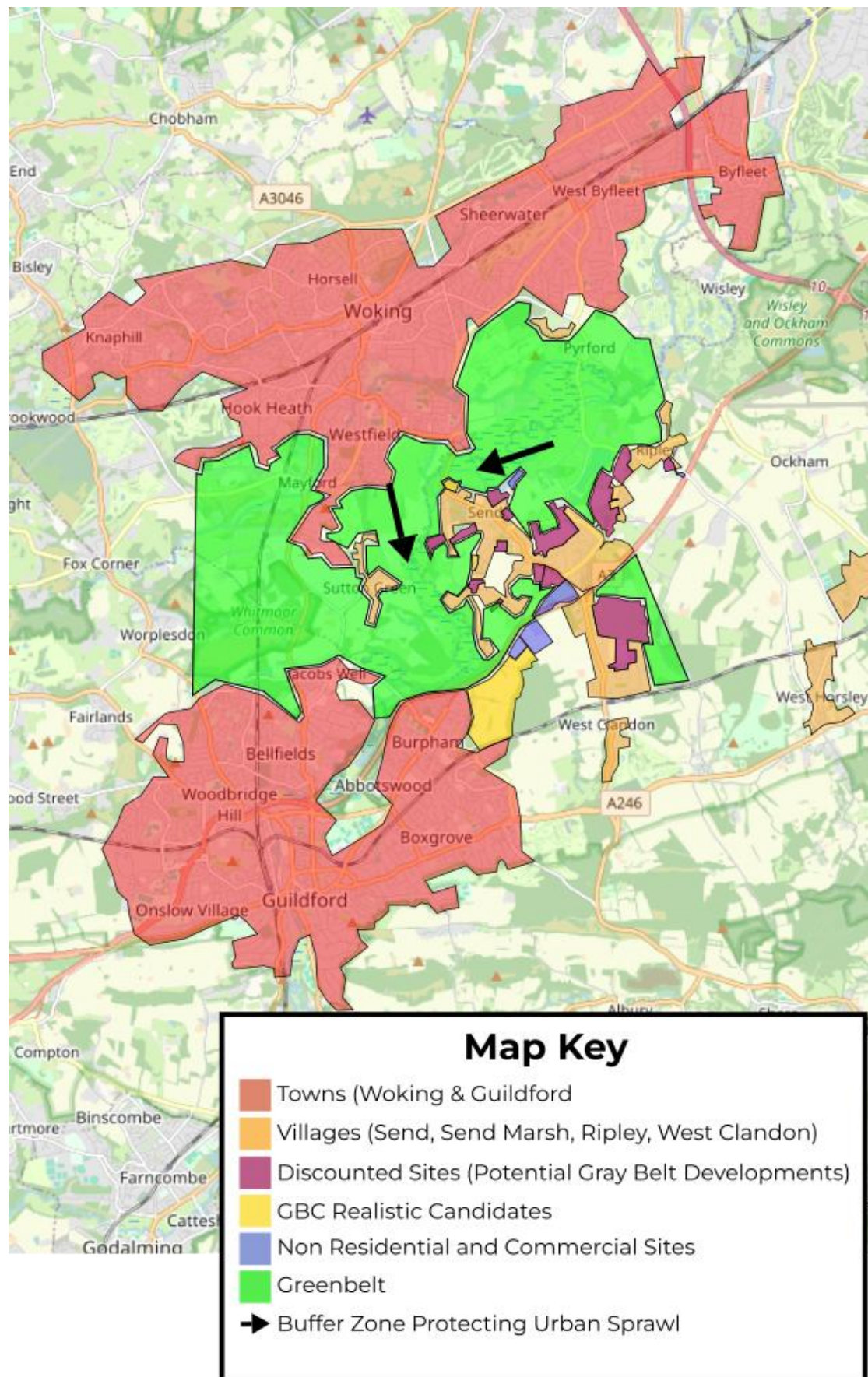
Send Parish Council
T: 01483 479312
E: clerk@sendparishcouncil.gov.uk
Send Parish Office
28 Send Road
Send

(See below Appendix 1 with maps)

Appendix 1



Map 1



Map 2